

Appendix 3: Assessing the effects of the draft Local Plan Review policies (Task B3)

**Draft Policies DS 1 – 14: Assessing the Effects of the Local Plan Review
Development Strategy**

Assessing the Effects of the Local Plan Review Development Strategy

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

Policies under 'Development Strategy' of the Draft Local Plan set the direction for broad areas of the city and include specific locations for regeneration and development; draft policies are set out in The Lockleaze Area of Growth and Regeneration (GRA) is located within North Bristol, where the Draft Local Plan proposes a minimum of 6,000 new homes across the entire area in accordance with the Development Strategy. The area has experienced significant regeneration in recent years, including public realm improvements at Gainsborough Square and infill development on several small sites owned by BCC. It is considered that the existing dwelling density of Lockleaze is low, compared with other areas of the city, resulting in a limited population to support the existing centre at Gainsborough Square and public transport services.

Key baseline and sustainability issues associated with the GRA are defined as follows:

- The GRA is located within an area of high deprivation and is an area that has a high proportion of working-age population who are involuntarily unemployed.
- The area is not within an AQMA or cumulative impact zone.
- Almost one fifth of the GRA is made up of land that is currently designated as Important Open Space (including Rowlandson Gardens, Gainsborough Square, Ashley Down Allotments and Railway Land, Lockleaze Primary School, Dovercourt Road Allotments and Dovercourt Road Open Space). The vast majority of these are proposed to be retained as Reserved Open Spaces or Local Green Spaces within the Local Plan Review.
- The Morris Road Railway Cutting and Bonnington Walk SNCI are located within the GRA. The GRA overlaps with several wildlife corridors, including the Bonnington Walk Open Space, Railway Land areas, Lockleaze School playing field, Land around Dovercourt Depot, Land rear of Downman Road and Dovercourt Road Allotments and Open Space (amongst others).
- A small percentage of the site (approximately 3%) to the north of the site is located within the Stapleton and Frome Valley Conservation Area, and the GRA is bounded at the south by the Grade II Stoke Park Registered Park and Garden in the south west. There are no listed features within the GRA site boundary.
- The area is not well-connected to existing communities in south and west Bristol.
- Approximately 1% of the GRA is currently allotment land (Dovercourt Road Allotments).

The GRA boundary includes land within approximately 1% of Flood Risk Zone 3b and 2% within Flood Risk Zone 2..

The policies under this theme represent the spatial expression of the majority of Local Plan aims and objectives, including setting an approach for inclusive and sustainable growth, enabling the delivery of at least 33,500 new homes and aiming to exceed this housing target where possible. By identifying broad areas for growth, these draft policies are seeking to *'take a plan-led approach to promoting areas with the potential to increase densities and make efficient use of under-used land; this includes transforming some areas of the city to create communities with new homes, work places and public open spaces'* (Aim 8).

Chapter 11 of the NPPF requires planning policies and decisions to promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. It also places emphasis on using as much brownfield or previously developed land as possible, particularly where there is an anticipated shortage of land for meeting identified housing needs. In these instances, planning policies and decisions should avoid homes being built at low densities and instead ensure optimal use of land.

A range of retained local policies are also relevant to these Development Strategy (DS) draft policies. These are considered to form part of the ‘current baseline’ for assessing DS draft policies against.

From the SA Scoping Report, there are a range of key sustainability issues which are raised both in earlier reasonable alternatives for housing and employment need and distribution sections, and others in topic-specific policy themes later within the chapter. A summary of these is also provided within Table 1. Site-specific sustainability issues are set out against individual GRA summaries below.

Table 1 Relationship with other relevant plans and programmes

Draft Policy	NPPF	Retained Policies	Additional evidence
Draft Policy DS1: Bristol City Centre	Paras 67; 72; 85; 92.	BCAP5; BCAP6; BCAP8; BCAP10-19; BCAP22-26; BCAP29-32; BCAP34; BCAP36; BCAP37; BCAP40; BCAP41.	<ul style="list-style-type: none"> • Bristol Temple Quarter Spatial Framework1 • Frome Gateway Spatial Framework – at consultation stage2 • Old Market Quarter Neighbourhood Development Plan3 • Bedminster Green Framework4 • Southmead Community Plan (2015-2025)5
Draft Policy DS2: Bristol Temple Quarter	Paras 117-120;		
Draft Policy DS3: St Philip’s Marsh	Paras 122-123		
Draft Policy DS4: Western Harbour	Paras 133 – 141.		
Draft Policy DS5: Frome Gateway			
Draft Policy DS6: Lawrence Hill			
Draft Policy DS7: Central Fishponds			
Draft Policy DS8: Central Bedminster			
Draft Policy DS9: Brislington			
Draft Policy DS10: Changes to the Green Belt in South Bristol			
Draft Policy DS11: Development allocations – southwest Bristol			
Draft Policy DS12: New neighbourhood – Bath Road, Brislington			
Draft Policy DS13: Lockleaze			
Draft Policy DS14 Central Southmead			

Stage 2: Identify and describe alternatives

To enable the delivery of least 33,500 new homes or exceed this housing target where possible, distribution requires the best use of urban land to be made with relatively limited Green Belt

¹ <https://www.bristoltemplequarter.com/key-projects/spatial-framework/>

² <http://www.bristolnnp.net/wp-content/uploads/2019/07/NPN-presentation-Frome-Gateway-PDF.pdf>

³ <https://www.bristol.gov.uk/documents/20182/403537/OMQNDP+made+version+WEB.pdf/ace7011a-3647-4c5a-8489-fe975a0355ca>

⁴ <https://news.bristol.gov.uk/resources/bedminster-green-framework-framework-document>

⁵ <http://southmeadcommunityplan.co.uk/wp-content/uploads/2015/02/Community-Summary.pdf>

release. The Growth and Regeneration Areas Draft Policies DS1 –DS10, DS13 and DS14 were based on locations within the city which had greatest levels of public transport accessibility and which have the greatest levels of urban potential.

Throughout this section, no reasonable alternatives (including in relation to distribution or ‘policy off’ options) are therefore considered, due to the change in the current situation, which is explored further within “Strategic Context for Reasonable Alternatives and the Local Plan Review” in Section 5.

Stage 3 Assessment and evaluation of effects: Consideration of technical and other difficulties in the identification / assessment of alternatives

- Whilst Growth and Regeneration Areas (referred to throughout as ‘GRAs’) have broadly defined boundaries, housing delivery will be made up from a combination of making efficient use of land through urban potential, alongside intensification and densification of existing allocations, existing commitments and completions, and small-site delivery. Whilst an assessment of urban potential was undertaken in 2018 which evaluated the capacity of urban land, there does remain some uncertainty about the locations of supply within this draft of the Local Plan Review, and therefore effects are predominantly uncertain.
- In the absence of more detailed Spatial Frameworks or GRA masterplans, it is not possible at this stage to assess some effects with any level of certainty. For example, Objective 2 of the extent to which a draft policy would promote the conservation and wise use of land, maximising the reuse of previously developed land. However, without provision of supplementary open space or a mix of uses, densification can have both positive and negative effects on wellbeing.
- Additional detail needs to be provided in relation to specific policy requirements, such as ‘imaginative enhancement’ of the Grade I Listed Temple Meads Station or the reconfiguration of the road network at Western Harbour, which may result in changes to the overall assessment of effects.
- A number of evidence base documents to understand effects require updates, including:
 - Open Space Assessment, so as to understand how levels of open space provision and deficiencies are likely to change following the Local Plan Review New Protection for Open Spaces.
 - An Infrastructure Study and Delivery Plan, as this would enable an accurate assessment of the current ‘gaps’ in provision of all infrastructure types, alongside providing a base for developer contributions. Establishing capacity of social infrastructure, including local schools, healthcare, social care and mental health facilities, community facilities and leisure will be essential to fully understanding the effects of draft GRA policies.
 - A Strategic Flood Risk Assessment, which will be essential to establishing both the current levels of flood risk within the City and impacts of draft policy proposals on levels of risk. Assessments of effects against Objective 15 are therefore made more generally, with an assumption that a Sequential Test would follow the identification of sites within the GRA boundaries.
 - Updated Bristol Transport Study and transport modelling, to inform Draft Policy T2, and to take account of strategic schemes within JLTP4, proposed levels of growth and transport proposals within GRAs on the highway network, levels of congestion and air quality.

- Up-to-date evidence on the impact of draft GRA policies on Conservation Areas and Ecological Networks, including the strategic Nature Recovery Networks.
- An Employment Strategy or Study, to offer greater clarity on supply of land for key employment sectors, demand for all employment types by sector and to understand whether further detail on the quantum of workspaces can be provided.
- A Retail and Local Centres Assessment, as many of the draft policies require 'retail and leisure' development particularly given the implications of Covid-19 on local centres.
- Draft policy text for GRAs is intentionally high-level; therefore, some SA Objectives which can be assessed equally at a 'principle-level' across all sites as set out below. The GRAs were also tested against constraints criteria using GIS (see Section 5 *SA Framework*), the purpose of which was to broadly assess the extent of constraints across these areas.

Summary of assessment findings across all GRAs

- As the development strategy requires a planning approach which sees the development of new and affordable homes as a core objective, the draft policies for GRAs all achieve positive or significant positive effects when assessed against SA Objective 1. Housing targets are set at a 'broad area' level, and therefore there is some uncertainty for how these will be disaggregated to component GRAs. There is also some variation in the degree of positive effects, based on specific reference within the policy text to factors such as quantity and type of housing.
- All GRAs would be required to be compliant with existing policies with respect to affordable housing, in line with BCS17, DM3 and the Affordable Housing Practice Note 2018⁶. For developments of more than 15 dwellings, this requires 30-40% affordable housing to be delivered on each site. A higher percentage (40%) of affordable housing would be sought for GRAs within North West, Inner West and Inner East Bristol, including Frome Gateway, Lawrence Hill, Temple Quarter, St Philip's Marsh and Western Harbour (north of the River Avon). As the JSP has been withdrawn, minimum targets in relation to 35% affordable housing on all developments over 0.2ha and a requirement for 40% on the Strategic Development Locations, such as Bath Road, have been removed. The effects are therefore also uncertain.
- SA Objective 2 requires the efficient use of land. Whilst GRAs do contain greenfield land within them, as draft policies DS 1 – 9, and 13 and 14 require intensification and densification of previously developed land as component of supply, GRAs could generate overall positive effects for recycling of land.
- Given that all GRAs also include direct overlap with one or more key community services (i.e. community centres, libraries, Post Offices and children's centres), and include or are within walking distance of existing Local, District or Town Centres, it is considered that each GRA has the potential to produce positive effects for SA Objectives 3 and 9.
- Effects of the regeneration and development of the GRAs when appraised against SA Objectives 13 and 14 are similar. As each of the GRAs are close to one or more sustainable transport routes (public transport, local or strategic cycleway, and/or rail station), it is considered that each has the potential to produce positive effects for encouraging low or zero carbon forms of transport (e.g. active travel). However, effects are also uncertain as more development could also create

⁶ <https://www.bristol.gov.uk/documents/20182/34560/Affordable+Housing+Practice+Note+2018/31012544-f558-ee5a-79fd-0ee560191537>

greater trip generation, depending on the nature and scale of development and capacity of sustainable transport modes for future occupants / users.

- It is also assumed that new development within the GRAs will need to meet required energy efficiency targets set by draft Local Plan policy and maximise on-site renewable energy generation. Some GRAs, and sites within them, are in closer proximity to the Heat Priority Network which could have positive effects against Objectives. However, the full effect is likely to be predominantly unknown and based on site-specific details, such as the scale, design, and layout of the development, alongside siting within a Heat Priority Network Areas. Taking the above into account, it is considered that all the sites therefore have an unknown effect for SA Objective 18.

Recommendations for all GRAs

- Update the approaches to mitigation within GRAs that are currently located within AQMAs, based upon the new Air Quality Action Plan (due for publication).
- For GRAs located in Bristol's Heat Priority Area, corresponding policy text should set out development requirements for connection to heat networks as a minimum, with enhancement/further provision by developers as required.
- It is recommended that spatial frameworks or local design codes be jointly prepared for each GRA (as with Bristol Temple Quarter and the Bedminster Green Framework), so as to include local communities, BCC statutory consultees and relevant organisations within the private, public and third sectors. This will ensure that development and regeneration of the GRAs is delivered in a holistic and coordinated manner, accounting for the specific sustainability issues identified within each GRA and its immediate surrounds.

Draft Policy DS1 Bristol City Centre

The Local Plan sets out that Bristol City Centre is an important location to focus urban living, leisure and retail, and economic development; and that it represents a sustainable location for required future growth.

Draft Policy DS1 (the 'March 2019 Consultation Option') represents the overarching development policy for the Central Bristol area. This area comprises Bristol City Centre, Bristol Temple Quarter, St. Philip's Marsh, Western Harbour, Old Market and Frome Gateway, several of which are defined as GRAs whilst others form areas covered by a 'made' Neighbourhood Plan.

Overarching sustainability issues associated with the area defined in Draft Policy DS1 are as follows:

- Flood risk is an overarching sustainability issue for proportions of the City Centre, and is therefore an issue that requires appropriate, continued management to safeguard communities and businesses, while meeting the city's growth ambitions.
- The City Centre represents Bristol's historic core, and the area includes multiple historic and natural environment assets, including Conservation Areas.
- Growth of the City Centre has introduced contemporary development, of which affects skyline and distinctiveness of place.

Detailed assessments, including analysis of key sustainability issues, of the GRAs Bristol Temple Quarter (Draft Policy DS2); St. Philip's Marsh (Draft Policy DS3), Western Harbour (Draft Policy DS4) and Frome Gateway (DS5) follow within the subsequent sections.

Furthermore, it is not the purpose this SA to appraise policies contained within the Old Market NDP, though it is acknowledged that these could create synergistic effects for this area. This is discussed briefly within the cumulative impacts assessment in Section 6 of the main report.

Draft Policy DS1 sets out principles related to the regeneration and development of Central Bristol, including for Bristol Temple Quarter, St. Philip's Marsh, Western Harbour, Frome Gateway, Broadmead and St. James' Barton; it would be implemented alongside Retained Policies from the adopted Bristol Central Area Plan. Draft Policy DS1 includes the following general requirements for development in the defined area up to 2036:

- New homes;
- High quality offices and flexible workspace;
- Improved transport systems and connectivity, including new and improved public transport, walking and cycling routes;
- Continuing consolidation and expansion on the University of Bristol and Bristol Royal Infirmary sites. Student accommodation will be carefully managed to avoid undue concentration and directed towards identified areas both in the city centre and elsewhere (Draft Policy H7 'Managing the development of purpose-built student accommodation'); and
- Continued improvement in regeneration areas including Redcliffe and Harbourside and at city centre gateways.

In relation to Broadmead and St. James' Barton, Draft Policy DS1 encourages more efficient use of land and a greater mix of uses around Broadmead and St. James'. Development will aim to reduce

severance caused by traffic, better connect the area to surrounding neighbourhoods and improve safety through public realm improvements. Guided by Retained Policies BCAP13 'Strategy for retail development in Bristol City Centre' and BCAP36 'Bristol Shopping Quarter', Draft Policy DS1 states that Bristol Shopping Quarter will remain the city's principal shopping location including redeveloped sites and a diversified retail offer.

In addition, the Draft Policy sets out general place principles for the City Centre, which require consideration of the following:

- Higher density, mixed use development;
- Major developments to demonstrate measures to create a city centre that is welcoming to all by enhancing social inclusion and community cohesion, especially in respect of those communities close to the city centre;
- Reduce the severance of parts of the city centre from neighbouring communities caused by major roads and other physical barriers;
- Maintain the Floating Harbour as a location for maritime industries and water-related recreation activities alongside its role as a visitor destination, blue infrastructure and a heritage asset;
- Continue to revitalised waterfront areas adjacent to the Floating Harbour, Feeder Canal and River Avon;
- Expect the design of development to demonstrate high quality place making in terms of appearance, function, conservation of heritage assets, sustainability and maintaining and enhancing green infrastructure;
- Tall buildings in the right setting and of the right design may be appropriate as part of the overall approach to development. Key views will be protected;
- Street design will give priority to pedestrian access, cycling and public transport; and
- New development should include measures to secure public access and routes for walking, cycling and public transport, including access to waterfront areas.

Assessment of Draft Policy DS1 is a summation of the following individual assessments:

- Assessment of place principles embedded in Draft Policy DS1 (above).
- Overall effects of development of GRAs in Bristol Temple Quarter (Draft Policy DS2); St. Philip's Marsh (Draft Policy DS3), Western Harbour (Draft Policy DS4) and Frome Gateway (DS5).
- Consideration of cumulative effects within Bristol City Centre district e.g. for office development and housing delivery.

As set out above, assessments of Draft Policies DS2-DS5 provide further detail on the specific effects of the GRAs contained within the Bristol City Centre area.

Draft Policy DS1: Bristol City Centre

SEA Theme	SA Framework Objective	D-M Criteria	Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Assessment of Sustainability Effects		Receptors (R) and/or affected groups (AGs)	Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Short	Medi	Long		Temporary (T) or Permanent (P)	Spatial Scale of Effect		
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	++/?	++/?	++/?	D	P	Local and City-wide	R: Local housing market, Bristol's population; AG: Bristol's population.	See mitigation recommendations within GRA assessments for DS2, DS3, DS4 and DS5, alongside recommendations made against H1 and E2 within strategic reasonable alternatives.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	++/?	++/?	++/?	D	P	Local	As above, plus: R: Brownfield sites and previously developed sites; AG: Local businesses.	See mitigation recommendations within GRA assessments for DS2, DS3, DS4 and DS5, alongside recommendations made against H1 and E2 within strategic reasonable alternatives.
	3. Ensure easy and affordable access to key services	DMC8	++/?	++/?	++/?	D	Both	Local and City-wide	R: Bristol's local economy; Bristol's population AG: Local businesses.	See mitigation recommendations within GRA assessments for DS2, DS3, DS4 and DS5 MB: Provide detail and definition of facilities and services which could contribute to the diversity of the city centre, and what this means for areas where there is currently relatively limited provision.
	4. Increase participation in cultural and community activities	DMC9	+/?	+/?	+/?	I	Both	Local; City-wide	AG: Bristol's population.	MB: Provide clear examples of measures that would qualify as socially inclusive / community development.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	++/?	++/?	++/?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design, and provide inclusive public realm to provide stronger connections to adjacent areas.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	-/?	-/?	-/?	Both	Both	Local and City-wide	R: Public health. AG: Bristol's population.	CR: Include reference to retained and draft transport DM policies. AM: Reference to Draft Policy HW2 in relation to mitigation of development proposals within AQMAs. MB: Include detail of specific green infrastructure, pedestrian and cycling connections (i.e. location, responsibility for delivery, cost, phasing) to increase likelihood of delivery.
Economy and Employment	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	++/?	++/?	++/?	Both	Both	Local and City-wide	R: Bristol's population AG: All groups	CR: Retain reference to HMO development/student accommodation policies to ensure delivery of new educational facilities is considered in light of the supporting policy context.
	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	AM: Require proposals for any redevelopment of business use sites to ensure defined quantum of workspace within mixed use development uses, to safeguard a range and balance of workspace MB: Set out the number jobs that are to be retained and increased across the GRA, how a range of skilled and less skilled jobs will be secured, and how this will be monitored. MB: Include reference to delivery of efficient zero carbon forms of workspace/office space. CR: Reference to transport policies that support delivery of sustainable transport infrastructure for office development. CR: Draft Policy E1 Inclusive economic development
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	++/?	++/?	++/?	I	Both	Local and City-wide.	R: Bristol's local economy; Bristol's population AG: Local businesses	MB: Ensure that retail service provision follows the retail hierarchy for the area. MB: Prepare a masterplan for Broadmead to guide development and ensure its coordination.
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	-/?	-/?	-/?	I	P	Local and City-wide	R: Cultural heritage; built environment; AG: Bristol's population.	AM: Provide appropriate evidence to determine assessment of effects. See mitigation recommendations within GRA assessments for DS2, DS3, DS4 and DS5. CR: Include reference to existing and draft design and conservation policies, and CR: Old Market NDP proposals.
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	-/?	-/?	-/?	I	P	Local; City-wide; trans-boundary	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM / CR: Reference need to conserve and enhance ecological networks associated with the River Avon, New Cut and Feeder Canal (SNCI and LNR), and set out detail and location for provision of accessible natural greenspace to ensure delivery. See mitigation recommendations within GRA assessments for DS2, DS3, DS4 and DS5.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+/?	+/?	+/?	D	P	Local; City-wide; trans-boundary	As above.	AM: Ensure cohesive and integrated GI networks, particularly including blue infrastructure opportunities associated with the waterways. CR: Existing policy in relation to GI within development. MB: Include reference to: design guidance / exemplar designs in relation to GI provision; any updated strategic GI strategy; location of and responsibilities for delivery. See mitigation recommendations within GRA assessments for DS2, DS3, DS4 and DS5.
Transport and Movement	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local; City-wide; trans-boundary	R: Public health; AG: Bristol's population.	MB: Set out requirement for proportionate public transport contributions/infrastructure provision by developers in conjunction with Draft Policy IDC1. CR: Schemes within JLT4. See mitigation recommendations within GRA assessments for DS2, DS3, DS4 and DS5.
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	D	P	Local and City-wide.	R and AG: Bristol's highway network; public health; Bristol's population.	See mitigation recommendations within GRA assessments for DS2, DS3, DS4 and DS5.
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	--/?	--/?	--/?	Both	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	AM: Make reference to the Bristol Flood Strategy and require appropriate reference to climate change allowances within flood risk assessments. CR: Retained Policy BCS16. See mitigation recommendations within GRA assessments for DS2, DS3, DS4 and DS5.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management.
	17. Minimise air and noise pollution	DMC38	-/?	-/?	-/?	I	Both	Local; City-wide; trans-boundary	R: Localised air quality; biodiversity; public health; built environment; AG: population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2. AM / CR: Agent of change principles / noise mitigation in relation to: proposals for evening economy and residential uses within the Silverthorne Lane area; and for conferencing facilities on Temple Island. See mitigation recommendations within GRA assessments for DS2, DS3, DS4 and DS5.

	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+/?	+/?	+/?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Suggest reference is made to the Heat Connection Zone, with an associated requirement for any future development proposals.
Evaluation of Effects	<p>Scale of effects: The scale of effects of this draft policy would cover the City Centre, specifically the Growth and Regeneration Areas within the City Centre boundary, and the Broadmead area. and the specific sites within this broader area. However, as this Draft Policy also sets place principles for the development of areas outside these defined boundaries, effects could also be city-wide in scale (e.g. tall building development, with implications for historic and environmental receptors). Negative effects of a cumulative nature are likely given the scale of the area to which the Draft Policy relates. Subject to mitigation these effects include heritage, ecological and flood risk. There would be cumulative impacts on the wider Bristol City Centre area, including for the delivery of affordable housing, and employment opportunities, the local transport network, heat network and localised energy demands, and waste management, amongst other key sustainability issues.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> This draft policy could have positive effects for housing delivery, through delivery of several GRAs (DMC1). In the absence of JSP policies for affordable housing or in-text references to appropriate levels of affordable housing, assessment of this policy against DMC2 is uncertain. Reference should be made to the total target of affordable housing provision intended to be delivered within the City Centre (in accordance with BCS17, DM3 or equivalent) which should be informed by a proportionate assessment of viability at the plan-level. The draft policy text references delivery of purpose-built student accommodation and could therefore produce positive effects for DMC3. Cross-reference could be made to proposed policies for community-led housing, and sites may be identified where there is sufficient evidence to do so (DMC4). Place principles set out by the draft policy text include the requirement for development to make efficient use of land, in line with Urban Living principles and the Local Plan Development Strategy. With proposals required to be developed in a comprehensive/co-ordinated manner, it is considered that this draft policy could provide generally significant positive, yet unknown, effects for SA Objective 2 (DMC5). Given the predominantly urban and brownfield nature of the GRAs within the City Centre, it is considered that their regeneration could produce positive effects for both DMC5 and DMC7, as this would safeguard Green Belt land and not extensively impact greenfield land. The exception to this is the Western Harbour area, which could also result in some development on greenfield land. Being sited within the City Centre, draft Policy UL2 requires that proposals for residential development reflect 200dph as a minimum, which could generate positive effects for DMC6. Effects of this draft policy text against Objective 2 are overall unknown, given that there is potential for both positive and negative effects related to intensification which are unlikely to be known until site-specific proposals come forward. The City Centre area and GRAs are within easy walking distance of a range of key services, therefore it is likely that significant positive effects would be generated for both future service provision and access (Objective 3, DMC8 and Objective 9, DMC23). There are areas which are less directly well provided for in terms of services, including Western Harbour and St Philip's Marsh, however, even these areas are in relatively close proximity to the primary shopping areas of Broadmead and other adjacent centres. This draft policy is considered to produce positive, yet unknown, effects for DMC9, as it references the need to consider social inclusion and community cohesion as part of its place principles. The policy text could include the requirement for specific forms of development of new community facilities, a net gain of community or community service facilities, and make cross-references to spatial frameworks / NDPs / or community-led masterplans. It is considered that this draft policy has the potential to produce significant positive effects for SA Objective 5 (DMC10 and DMC11), as GRAs are located within areas of high deprivation. Development and regeneration therefore has the potential to transform the built environment through improved sustainable transport linkages, public realm improvements and offering opportunities for investment in local employment through the provision of workspace. Effects are also partly unknown and remain dependent upon implementation. While the City Centre contains several areas of valued public open space, some of which would be protected through proposed Local Green Space or Reserved Open Space protection, it is unknown the extent to which redevelopment of GRAs would support positive well-being and healthy lifestyles (DMC13) until site-specific proposals come forward. As the GRAs and a significant proportion of the City Centre is within an AQMA, it is considered that future occupants/users of development within the GRAs are likely to be subject to relatively poor air quality which will require appropriate mitigation. Draft policy text associated with the Bristol Temple Quarter GRA recognises that additional educational facilities will be provided, in relation to both the University of Bristol campus provision and proposals at Silverthorne Lane. This draft policy could therefore generate positive effects, or even city-wide significant positive effects, for DMC16 as it is considered that there is a high level of physical accessibility to existing surrounding and emerging educational facilities. There are no new educational proposals with other draft DS policies, and therefore whilst GRAs are generally within accepted accessibility distances of establishments, levels of growth on education infrastructure would need to be considered. This draft policy is considered to produce positive effects for SA Objective 8 where development is required to provide high quality workspace and offices (DMC17). The sector type of employment/business use is not specified within policy text, and therefore effects of this policy text are uncertain for DMC18; however, provision of high-quality workspaces could support the: creative, cultural and digital industries; and financial, business and legal 'tech' services as defined within the Local Industrial Strategy. This could bolster the role of Temple Quarter Enterprise Zone as a key employment location. As the GRA is located in an area with a high rate of unemployment, it is also considered that this draft text could generate positive effects for DMC19. It is uncertain the extent to which this Policy Option would support delivery of carbon neutral employment space, although the area itself is accessible by sustainable transport modes and this could serve to encourage a shift from unsustainable modes of travel to places of employment (DMC21). Given that the Draft Policy sets out that Broadmead will be diversified and remain as the city's principal shopping area, and that mixed-use development is set out within the GRAs, it is considered that this policy has the potential to produce significant positive effects for SA Objective 9 (DMC22; DMC23). With several listed features within the City Centre, including both Grade I and Grade II* listed buildings, there remains significant potential for cumulative impacts of redevelopment or new intensive development such as tall buildings on the historic environment (DMC24). However, effects are unknown until site-specific proposals and proposed mitigation come forward. Several of the GRAs within the City Centre front on to the River Avon SNCI and Feeder Canal SNCI, and are also adjacent to the New Cut Local Nature Reserve which is a statutory designation, and as such, there could be cumulative impacts of the development of multiple GRAs in the absence of ecological mitigation (DMC25). While it will be mandated by the forthcoming Environment Bill 2020, the delivery, scale and location of any net gain in biodiversity remains subject to any future development proposal and is therefore uncertain (DMC26). As the draft policy references the requirement for development to include GI and public realm improvements and protection of the Floating Harbour as a blue infrastructure asset, it is considered that this Option could therefore generate positive effects for SA Objective 12 (DMC27). However, effects are partly uncertain as the nature of such improvements, and their integration with the existing GI network, will be based upon detailed design. Both the Temple Quarter GRA and policy text addressing the St. James' Barton roundabout is focussed around ensuring Bristol Temple Meads Train Station is transformed and fully-connected, and existing severances on the highway network resolved (Objective 13, DMC28 and 29). The draft policy text requires development to reduce severance caused by traffic, better connect the area to surrounding neighbourhoods and improve safety through public realm improvements (DMC30 and DMC31). Providing a 'fully-connected' and modern transport hub at Temple Meads Station could result in a significant effect on access to, and quality of, sustainable transport modes particularly for surrounding communities. The effects of development at Frome Gateway, and Western Harbour GRA proposals on the local and strategic highway network would need to be subject to more detailed traffic modelling, given these areas form principal public transport nodes or connect to the Strategic Road Network. Transport improvements set within the respective place principles for each GRA include public transport improvements, provision to support freight consolidation and local highway improvements. At Western Harbour, reconfigured highway system would simplify the network in this location, reducing congestion and improving the cohesiveness of public transport and active travel routes. Flood risk within the GRAs and areas of the City Centre is considered to be moderate-high overall, with significant areas of the City Centre located within Flood Risk Zone 3. While the exact location of new development within the GRA boundaries is unknown, it is considered that the potential for negative effects of development/regeneration for local flood risk and/or to be subject to flood risk issues is therefore relatively high when appraised against SA Objective 15. The requirement for a Flood Risk Assessment or Sequential Test (as appropriate) could serve to mitigate flood risk issues and ensure that development accounts for future climate change scenarios, however it is unclear of the effects of this on the developable area within the GRAs and City Centre areas. The use of SUDS as set out by retained flood risk Policy BCS16 could provide appropriate mitigation for any adverse surface water flood risk at the site. It is considered imperative that a Flood Strategy be prepared for the City Centre to direct and future-proof development. Whilst the area is not adjacent to groundwater protection zones, it is adjacent to the River Avon, of which is classified as 'moderate' due to chemical imbalances associated with presence of priority hazardous substances. Moreover, the extent to which this Policy Option would deliver a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production is unknown (DMC35, DMC36); and remains dependent upon the nature of detailed design proposals and compliance with other draft policies on climate change and sustainability. As set out above, the GRAs and much of the City Centre is located within an existing AQMA and as such it is considered that this may cause undue exposure of new development and its future occupants to high levels of existing pollutants (DMC38). The effect of proposals are also partly unknown, and remain dependent upon the nature of development, alongside the availability and usage of sustainable and/or active travel modes and any mitigation proposed against Draft Policy HW2. All GRAs within the City Centre area are within a Priority Heat Connection Zone which could provide opportunities for the use of low carbon and decentralised energy sources (DMC40). 									

Draft Policy DS2 Bristol Temple Quarter Area of Growth and Regeneration

The Bristol Temple Quarter Area of Growth and Regeneration (GRA) is located within the City Centre.

Key baseline and sustainability issues associated with the GRA are defined as follows:

- The GRA is located within a moderate-high area of deprivation (based on IMD 2019 data);
- A significant proportion of the GRA is located within an AQMA (approximately 91%) and therefore NO₂ and particulate matter (PM₁₀) concentrations exceed or potentially exceed national targets;
- Two SNClS are located adjacent to, and slightly overlap with, the GRA (River Avon and Feeder Canal);
- The GRA overlaps with an existing wildlife corridor (Floating Harbour) (approximately 9%);
- A small area of the Avon New Cut Local Nature Reserve overlaps with the GRA (approximately 4%);
- The north western extent of the GRA is bounded by the Redcliffe Conservation Area, and the GRA contains several listed features, including the Grade I listed Temple Meads station and Grade II* Listed St Vincent's works;
- The GRA is within a Heat Connection Zone which therefore offers opportunities for the use of low carbon energy networks/decentralised energy sources within new development; and
- Flood risk within the GRA is moderate-high, with large areas of the GRA being located within Flood Risk Zones 2, 3a and 3b (approximately 40%, 7% and 24% respectively, although these can be overlapping) and with small areas subject to high and medium surface water flood risk.

Draft Policy DS2 (the 'March 2019 Consultation Option') sets out principles related to the regeneration and development of the Bristol Temple Quarter GRA; it includes the following requirements:

- The provision of additional high-quality office and flexible workspace;
- Substantial numbers of new and affordable homes including live / workspace;
- A transformed and fully connected Temple Meads Station;
- Education facilities including a new campus for University of Bristol and associated student accommodation (PBSA) (in accordance with Draft Policy H7);
- Hotel and conference/convention facilities;
- Complementary retail and leisure uses, particularly within and adjacent to Bristol Temple Meads station;
- New walking and cycle routes to connect the developments to the rest of the city centre and surrounding neighbourhoods;
- Infrastructure and services to support the new development;
- New and enhanced public realm and green infrastructure including a continuous and accessible quayside walkway and the improvement of open space to serve the new developments.

In addition, development will be expected to:

- Be guided by a masterplan in combination with St. Philip's Marsh, to coordinate approach to development across these areas and the surrounding communities;

- Have a form, scale and density consistent with its city centre location and as part of this, tall buildings of an appropriate design and setting may be appropriate as part of the development mix;
- Contribute towards an appropriate mix of housing types;
- Preserve and enhance heritage assets, incorporating them imaginatively into new development to deliver a strong sense of place; and
- Where proposed on sites bordering the Totterdown Basin area, will be expected to complement its enhancement as a fully accessible natural green space with a wildlife function, including provision of pedestrian and cycle links through the area.

Draft Policy DS2 also specifies policy provisions related to Temple Meads area; Silverthorne Lane area; Temple Island; York Road/Mead Street area, including the requirement for development to ensure integration with the interchange and include a new university campus with associated purpose-built student accommodation.

Draft Policy DS2: Bristol Temple Quarter

SEA Theme	SA Framework Objective	D-M Criteria	Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Assessment of Sustainability Effects Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Short	Medi	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	++/?	++/?	++/?	D	P	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	AM: Make reference to the explicit number of units to be delivered within the GRA. CR: Explicitly state requirement for affordable housing as a percentage, which should be informed by an assessment of viability at the plan-level. CR: Self-build and/or community led housing draft policies and consider sites for delivery where appropriate evidence exists. MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	++/?	++/?	++/?	D	P	Local	As above, plus: R: Brownfield sites and previously developed sites; AG: Local businesses.	MB: Publish masterplan for Bristol Temple Quarter Enterprise Zone and St Philip's Marsh Spatial Framework, to ensure that development of higher density is informed by a comprehensive or coordinated approach.
	3. Ensure easy and affordable access to key services	DMC8	++/?	++/?	++/?	D	Both	Local and City-wide	R: Bristol's local economy; Bristol's population AG: Local businesses.	MB: Provide definition of 'complementary retail and leisure uses' within the wider GRA.
	4. Increase participation in cultural and community activities	DMC9	+/?	+/?	+/?	I	Both	Local; City-wide	AG: Bristol's population.	MB: Include support for the development of new community facilities, as appropriate.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	++/?	++/?	++/?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design, and provide inclusive public realm to provide stronger connections to adjacent areas.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	-/?	-/?	-/?	Both	Both	Local and City-wide	R: Public health. AG: Bristol's population.	CR: Include reference to retained and draft transport DM policies. AM: Reference to Draft Policy HW2 in relation to mitigation of development proposals within AQMAs. MB: Include detail of specific green infrastructure, pedestrian and cycling connections (i.e. location, responsibility for delivery, cost, phasing) to increase likelihood of delivery.
Economy and Employment	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	++/?	++/?	++/?	Both	Both	Local and City-wide	R: Bristol's population AG: All groups	MB: Ensure physical access to, and catchment access to, emerging educational proposals from adjacent neighbourhoods outside the GRA, to increase participation rates in education and skills development.
	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	MB: Support delivery of flexible and/or co-working employment space. CR: Reference to transport policies that support delivery of sustainable transport infrastructure for office development. CR: Draft Policy E1 Inclusive economic development. AM: Require proposals for any redevelopment of business use sites to ensure defined quantum of workspace within mixed use development uses, to safeguard a range and balance of workspace.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Bristol's local economy; Bristol's population AG: Local businesses	MB: Ensure that retail service provision follows the retail hierarchy for the area.
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	--/?	--/?	--/?	I	P	Local and City-wide	R: Cultural heritage; built environment; AG: Bristol's population.	CR: Include reference to existing and draft design and conservation policies. AM: Establish more detailed design principles in relation to the 'imaginative enhancement' of Bristol Temple Meads Station, to ensure that there is no effect on the significance of this listed building.
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	-/?	-/?	-/?	I	P	Local; City-wide; trans-boundary	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM / CR: Reference need to conserve and enhance ecological networks associated with the River Avon, New Cut and Feeder Canal (SNCI and LNR), and set out detail and location for provision of accessible natural greenspace to ensure delivery. AM: Consider removing portion of land within GRA that overlaps with designated LNR (minor overlap).
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+/?	+/?	+/?	D	P	Local; City-wide; trans-boundary	As above.	AM: Ensure cohesive and integrated GI networks. CR: Existing policy in relation to GI within development. MB: Include reference to: design guidance / exemplar designs in relation to GI provision; any updated strategic GI strategy; location of and responsibilities for delivery.
Transport and Movement	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	++/?	++/?	++/?	I	Both	Local; City-wide; trans-boundary	R: Public health; AG: Bristol's population.	MB: Set out requirement for proportionate public transport contributions/infrastructure provision by developers in conjunction with Draft Policy IDC1. CR: Schemes within JLT4. MB: Provide detail for a 'transformed and fully connected Temple Meads Station' and location of walking and cycling routes. Consider how this could unlock accessibility for land east of the station. AM: Provide definition of freight consolidation and local highway improvements.
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	D	P	Local and City-wide.	R and AG: Bristol's highway network; public health; Bristol's population.	
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	--/?	--/?	--/?	Both	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	AM: Make reference to the Bristol Flood Strategy and require appropriate reference to climate change allowances within flood risk assessments. CR: Retained Policy BCS16.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management.
	17. Minimise air and noise pollution	DMC38	-/?	-/?	-/?	I	Both	Local; City-wide; trans-boundary	R: Localised air quality; biodiversity; public health; built environment; AG: population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2. AM / CR: Agent of change principles / noise mitigation in relation to: proposals for evening economy and residential uses within the Silverthorne Lane area; and for conferencing facilities on Temple Island.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+/?	+/?	+/?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Suggest reference is made to the Heat Connection Zone, with an associated requirement for any future development proposals.

Evaluation of Effects	<p>Scale of effects: The scale of effects of this draft policy would be predominantly the Growth and Regeneration Area and the specific sites within this broader area. However, as this GRA is focussed around development of Temple Meads as a ‘transformed and connected’ Station within the heart of the Temple Quarter Enterprise Zone, effects could also be city-wide in scale. Negative effects are potentially likely, subject to mitigation, at a city-wide level for heritage, ecological and flood risk Objectives. There would be cumulative impacts on the wider Bristol City Centre area, including for the delivery of affordable housing, employment opportunities, the local transport network, heat network and localised energy demands, and waste management, amongst other key sustainability issues.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This draft policy could have positive effects for housing delivery, although the quantum proposed in this GRA is not specified within policy text (DMC1). In absence of JSP policies for affordable housing or in-text references to appropriate levels of affordable housing, assessment of this policy against DMC2 is uncertain. Reference should be made to the appropriate percentage target of affordable housing provision (in accordance with BCS17, DM3 or equivalent) which should be informed by a proportionate assessment of viability at the plan-level. The draft policy text references delivery of purpose-built student accommodation and could therefore produce positive effects for DMC3. Cross-reference could be made to proposed policies for community-led housing, and sites may be identified where there is sufficient evidence to do so (DMC4). • Place principles set out by the draft policy text include the requirement for development to make efficient use of land, in line with Urban Living principles and the Local Plan Development Strategy. With proposals required to be developed in a comprehensive/co-ordinated manner, it is considered that this draft policy could provide positive, yet unknown, effects for SA Objective 2 (DMC5). Given the predominantly urban and brownfield nature of the GRA, it is considered that its regeneration could produce positive effects for both DMC5 and DMC7, as it would safeguard Green Belt land and not extensively impact greenfield land. Being sited within the City Centre, draft Policy UL2 requires that proposals for residential development reflect 200dph as a minimum, which could generate positive effects for DMC6. Effects of this draft policy text against Objective 2 are overall unknown, given that there is potential for both positive and negative effects related to intensification which are unlikely to be known until site-specific proposals come forward. • The Growth and Regeneration Area falls within the wider City Centre boundary. Although there is limited provision of services within the Bristol Temple Quarter boundary itself, the area is within easy walking distance of a range of key services within the City Centre and is around 800m walking distance of the Bedminster Town Centre (Objective 3, DMC8 and Objective 9, DMC23). • The draft policy proposes the development of conference facilities on Temple Island, which may have community and cultural benefits (subject to access). This draft policy is considered to produce positive, yet unknown, effects for DMC9. The policy text could also explicitly include the requirement for the development of new community facilities, a net gain of community or community service facilities. • It is considered that this draft policy has the potential to produce significant positive effects for SA Objective 5 (DMC10 and DMC11), as the GRA is located within an area of high deprivation. Development and regeneration of this GRA therefore has the potential to transform the built environment through improved sustainable transport linkages, public realm improvements and offering opportunities for investment in local employment through the provision of workspace. Effects are also partly unknown and remain dependent upon site specific proposals. • Due to the relatively limited open green space provision, it is unknown the extent to which redevelopment of the GRA would support positive well-being and healthy lifestyles (DMC13) until site-specific proposals come forward. As the area is within an existing AQMA, it is considered that future occupants/users of development within the GRA are likely to be subject to relatively poor air quality which will require appropriate mitigation. • While there are no educational facilities within the GRA boundary, it is within 800m of a primary school and 1500m of a secondary school. Draft policy text associated with the GRA recognises that additional educational facilities will be provided, in relation to both the University of Bristol campus provision and proposals at Silverthorne Lane. The draft policy could therefore generate positive effects, or even city-wide significant positive effects, for DMC16 as it is considered that there is a high level of physical accessibility to existing surrounding and emerging educational facilities. • This draft policy is considered to produce positive effects for SA Objective 8 where development is required to provide high quality workspace and offices (DMC17). The sector type of employment/business use is not specified within policy text, and therefore effects of this policy text are uncertain for DMC18; however, provision of high-quality workspaces could support the: creative, cultural and digital industries; and financial, business and legal ‘tech’ services as defined within the Local Industrial Strategy. This could bolster the role of Temple Quarter Enterprise Zone as a key employment location. As the GRA is located in an area with a high rate of unemployment, it is also considered that this draft text could generate positive effects for DMC19. It is uncertain the extent to which this Policy Option would support the delivery of carbon neutral employment space, although the area itself is accessible by sustainable transport modes and this could serve to encourage a shift from unsustainable modes of travel to places of employment (DMC21). • With several listed features within the GRA site boundary, including both Grade I and Grade II* listed buildings, there remains potential for impact of redevelopment or new development on the historic environment (DMC24). This is particularly the case given for proposals for ‘imaginative enhancement’ of the northern access to the Grade I Listed Temple Meads Station and location of tall buildings within its setting; which could both result in significant negative effects against Objective. However, effects are unknown until site-specific proposals and proposed mitigation come forward. • The GRA fronts on to the River Avon SNCI and Feeder Canal SNCI, is also adjacent to the New Cut Local Nature Reserve which is a statutory designation. The draft policy requires development adjacent to Totterdown Basin to complement its enhancement as a fully accessible natural green space with a wildlife function; however this should also consider appropriate and proportionate ecological mitigation along the New Cut and Feeder Canal (DMC25). While it will be mandated by the forthcoming Environment Bill 2020, the delivery, scale and location of any net gain in biodiversity remains subject to any future development proposal and is therefore uncertain (DMC26). • As the draft policy references the requirement for development to include GI and public realm improvements, it is considered that this Option could therefore generate positive effects for SA Objective 12 (DMC27). However, effects are partly uncertain as the nature of such improvements, and their integration with the existing GI network, will be based upon detailed design. • The Growth and Regeneration Area is focussed around ensuring Bristol Temple Meads Train Station is transformed and fully-connected (Objective 13, DMC28 and 29). The draft policy text requires new walking and cycling routes, including to the rest of the city, adjacent neighbourhoods and through a quayside walkway. It also requires the Station to be transformed into a modern transport interchange and a welcoming arrival point into the City, and associated support freight consolidation and local highway improvements (DMC30 and DMC31). Whilst the area to the north and west of the station is considered to be well served by public transport, the area to the south and east is less well served (the Silverthorne Lane area). Providing a ‘fully-connected’ Temple Meads Station and references to proposals within JLTP4 could result in a significant effect on access to, and quality of, sustainable transport modes. • Flood risk within the GRA is considered to be high, with significant areas located within Flood Risk Zones 2 and 3. While the exact location of new development within the GRA boundary is unknown, it is considered that the potential for negative effects of development/regeneration for local flood risk and/or to be subject to flood risk issues is therefore relatively high when appraised against SA Objective 15. The requirement for a Flood Risk Assessment or Sequential Test (as appropriate) could serve to mitigate flood risk issues and ensure that development accounts for future climate change scenarios, however it is unclear of the effects of this on the developable area within the GRA. The use of SUDS as set out by retained flood risk Policy BCS16 could provide appropriate mitigation for any adverse surface water flood risk at the site. • Whilst the area is not adjacent to groundwater protection zones, it is adjacent to the River Avon, of which is classified as ‘moderate’ due to chemical imbalances associated with presence of priority hazardous substances. Moreover, the extent to which this Policy Option would deliver a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production is unknown (DMC35, DMC36); and remains dependent upon the nature of detailed design proposals and compliance with other draft policies on climate change and sustainability. • As set out above, the GRA is located within an existing AQMA and as such it is considered that this may cause undue exposure of new development and its future occupants to high levels of existing pollutants (DMC38). The effect of proposals are also partly unknown, and remain dependent upon the nature of development, alongside the availability and usage of sustainable and/or active travel modes and any mitigation proposed against Draft Policy HW2. • The GRA is within a Priority Heat Connection Zone which could provide opportunities for the use of low carbon and decentralised energy sources (DMC40).
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Draft Policy DS3 St. Philip's Marsh Area of Growth and Regeneration

The St. Philip's Marsh Area of Growth and Regeneration (GRA) is located within the City Centre, and currently contains a mix of industrial and distribution uses, electricity and railway infrastructure.

Key baseline and sustainability issues associated with the GRA are defined as follows:

- The GRA is considered to be within an area of high deprivation, and in an area that is currently experiencing a moderate-high level of unemployment (based on IMD 2019 data);
- Over half of the land within the GRA is located within an AQMA and therefore exists in an area of concentrations of NO₂ and particulate matter (PM₁₀) that exceed or potentially exceed national targets;
- The majority of the GRA is currently designated as Principal Industrial and Warehousing Land;
- There is one area of Important Open Space (Sparke Evans Park) which is adjacent to the River Avon (approximately 6%);
- There is an overlap with the River Avon SNCI located at the southern boundary of the GRA, and two existing wildlife corridors (Land around electricity sub-station; and Sparke Evans Park) (approximately 7%);
- The GRA is within a Heat Connection Zone, which therefore offers opportunities for the use of low carbon energy networks/decentralised energy sources within new development; and
- Flood risk within the GRA is high, with large areas of the GRA being located within Flood Risk Zones 2, 3a and 3b (approximately 53%, 24% and 20% respectively, although these can be overlapping) and areas subject to high and medium surface water flood risk.

Draft Policy DS3 (the 'March 2019 Consultation Option') sets out principles related to the regeneration and development of the St. Philip's Marsh GRA; to complement the adjacent Bristol Temple Quarter.

The Draft Policy sets out that development will ensure the retention, refurbishment, intensification and/or redevelopment and innovative reincorporation of workspace to ensure increased employment opportunities and that the diversity of business and economic development is maintained and enhanced; it includes the following requirements:

- High quality office and flexible workspace;
- Industry and distribution premises;
- Food systems infrastructure and facilities;
- New and affordable homes including live/workspace;
- Student accommodation (to be delivered in line with Draft Policy H7);
- Supporting services and facilities;
- Maintained and safeguarded transport and utility infrastructure where required;
- New walking and cycle routes to connect the developments to the rest of the city centre and surrounding neighbourhoods; and
- New and enhanced public realm and green infrastructure, including improvements to the setting of the Feeder Canal, and the retention, enhancement and creation of open space to serve the new developments.

In addition, development will be expected to:

- Be subject to a detailed masterplan which will coordinate the approach to the development of St. Philip's Marsh and the adjacent Bristol Temple Quarter;
- Have a form, scale and density consistent with its central urban location;
- Demonstrate measures to create a city centre that is welcoming to all by enhancing social inclusion and community cohesion, especially in respect of communities in adjoining areas;
- Ensure development of new workspace and other commercial development assists in enabling access to employment for local residents, facilitating skills development and supporting employment initiatives (in accordance with Draft Policy E1);
- Contribute towards an appropriate mix of housing types, including affordable homes;
- Improve the connectivity of the area to neighbouring communities;
- Facilitate and contribute towards the delivery of eastern access to Temple Meads Station;
- Ensure the provision of appropriate green infrastructure and open space. Sparke Evans Park will be enhanced to serve the wider area and provide space for recreation;
- Retain and enhance pedestrian/cycle links to areas south of River Avon;
- Be supported by transport improvements which will include public transport enhancements enhanced connectivity with surrounding areas, cycle provision, pedestrian route improvements and local highway improvements;
- Include an approach to parking provision that reflects the area's central location and connectivity;
- Be required to include appropriate mitigation to ensure that the risk of flooding is appropriately addressed and does not add to flood risk elsewhere;
- Sites at risk of flooding should be supported by a flood risk sequential test undertaken within the policy area, taking account of all reasonably available sites in the area. The development of sites that are at risk of flooding or are larger than one hectare in size should be supported by a Flood Risk Assessment.

Draft Policy DS3 also specifies particular policy provisions related to North West St. Philip's Marsh; South of Albert Road; Feeder Canal Area; Central St. Philip's Marsh and eastern St. Philip's Marsh, including the requirement for development to enhance the river front and canal settings.

Draft Policy DS3: St. Philip's Marsh

SEA Theme	SA Framework Objective	D-M Criteria	Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Assessment of Sustainability Effects		Receptors (R) and/or affected groups (AGs)	Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Short	Med	Long		Temporary (T) or Permanent (P)	Spatial Scale of Effect		
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	++/?	++/?	++/?	D	p	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	AM: Make reference to the explicit number of units to be delivered within the GRA. CR: Explicitly state requirement for affordable housing as a percentage, which should be informed by an assessment of viability at the plan-level. This will be essential to prevent displacement of existing communities within the St Phillips Marsh area. CR: Self-build and/or community led housing draft policies and consider sites for the delivery where appropriate evidence exists. MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	++/?	++/?	++/?	D	p	Local	As above, plus: R: Brownfield sites and previously developed sites; AG: Local businesses.	MB: Publish masterplan for Bristol Temple Quarter and St Philip's Marsh, to ensure that development of higher density is informed by a comprehensive or coordinated approach.
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	D	Both	Local	R: Bristol's local economy; Bristol's population AG: Local businesses.	MB: Provide additional detail on the definition of supporting services and facilities.
	4. Increase participation in cultural and community activities	DMC9	?	?	?	I	Both	Local	AG: Bristol's population.	MB: Include support for the development of new cultural/community facilities, as appropriate.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	++/?	++/?	++/?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design, and provide inclusive public realm to provide stronger connections to adjacent areas.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	-/?	-/?	-/?	Both	Both	Local and City-wide	R: Public health. AG: Bristol's population.	CR: Include reference to retained and draft transport DM policies. AM: Reference to Draft Policy HW2 in relation to mitigation of development proposals within AQMAS. MB: Include detail of specific green infrastructure, pedestrian and cycling connections (i.e. location, responsibility for delivery, cost, phasing) to increase likelihood of delivery.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	+/?	+/?	+/?	Both	Both	Local and City-wide	R: Bristol's population AG: All groups	MB: Ensure physical access to, and catchment access to, emerging educational proposals from adjacent neighbourhoods outside the GRA, to increase participation rates in education and skills development.
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	MB: Support delivery of flexible and/or co-working employment space; and ensure the delivery of a range of business uses by explicitly setting out the floorspace ratio for each B use class. MB: Include reference to delivery of efficient zero carbon forms of workspace/office space. CR: Reference to transport policies that support delivery of sustainable infrastructure for offices. AM: Require proposals for any redevelopment of business use sites to ensure re-provision of a defined quantum of workspace within mixed use development, to safeguard a range and balance of workspace. MB: Set out the number of jobs that are to be retained and increased across the GRA, how a range of skilled and less skilled jobs will be secured, and how this will be monitored.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Bristol's local economy; Bristol's population AG: Local businesses	MB: Provide additional detail on the definition of supporting services and facilities.
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	0/?	0/?	0/?	I	P	Local and City-wide	R: Cultural heritage; built environment; AG: Bristol's population.	CR: Include reference to existing and draft design and conservation policies. AM: Establish more detailed design principles in relation to the enhancement of Bristol Temple Meads Station (outside the GRA).
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	-/?	-/?	-/?	I	P	Local and City-wide.	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM: Reference need to conserve and enhance ecological networks associated with the River Avon SNCI and two wildlife corridors. MB: Incorporate ecological benefits / natural greenspace into greenway proposals.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+/?	+/?	+/?	D	P	Local and City-wide.	As above.	AM: Loss of GI should be replaced where it would enhance cohesive GI network. CR: Existing policy in relation to GI within development. MB: Include reference to: design guidance / exemplar designs in relation to GI and open space provision; any updated strategic GI strategy; location of and responsibilities for delivery.
Transport and Movement	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	MB: Set out requirement for proportionate public transport contributions/infrastructure provision by developers in conjunction with Draft Policy IDC1. MB: Provide detail and location of 'walking and cycling routes', greenway and enhanced public transport connections.
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	D	P	Local and City-wide.	R: Bristol's highway network; public health; Bristol's population.	n/a
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	--/?	--/?	--/?	Both	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	AM: Make reference to the Bristol Flood Strategy, provide clarity for how River Avon flood risk infrastructure would be delivered if development comes forward in a piecemeal way; and require appropriate reference to climate change allowances within flood risk assessments. CR: Retained Policy BCS16.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management. AM: Provide definition to 'food systems infrastructure and facilities', and identify suitable locations for other recycling uses within Bristol.
	17. Minimise air and noise pollution	DMC38	-/?	-/?	-/?	I	Both	Local; City-wide; trans-boundary	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; wildlife.	CR: Air pollution mitigation proposed within draft policy HW2. AM / CR: Agent of change principles / noise mitigation in relation to: proposals for residential uses and workspace, industry and distribution uses, particularly in Eastern St Phillips Marsh.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+/?	+/?	+/?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Suggest reference is made to the Heat Connection Zone, with an associated requirement for any future development proposals.

Evaluation of Effects	<p>Scale of effects: The scale of effects of this draft policy would be predominantly attributable to the Growth and Regeneration Area and the specific sites within it. However, as the GRA proposes the use of underused employment land within the heart of the city for mixed-use development, effects are likely to be complex and felt at a city-wide scale. Whilst city-wide benefits could be achieved for the provision of new and affordable homes, employment opportunities are likely to change from the current situation within the area. Cumulatively with DS8 Central Bedminster, this could result in a provision of new and different employment spaces and workspaces for less-skilled sectors in the central area of the city. Through better accessibility and inclusive economic development principles, this could have positive effects on supporting the economy and ensure that there are suitable opportunities for employment. In the absence of inclusion of reference to the Bristol Tidal Flood Risk Strategy, there could be significant negative effects related to reducing the risk of flooding from all sources. Subject to proposals for mitigation alongside DS2, there could also be negative effects on the River Avon SNCI.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This draft policy could have positive effects for housing delivery, although the quantum proposed in this GRA is not specified within policy text (DMC1). In the absence of JSP policies for affordable housing or in-text references to appropriate levels of affordable housing, assessment of this policy against DMC2 is uncertain. Reference should be made to the appropriate percentage target of affordable housing provision (in accordance with BCS17, DM3 or equivalent) which should be informed by a proportionate assessment of viability at the plan-level. The draft policy text references delivery of purpose-built student accommodation and the requirement to contribute to an appropriate mix, which could therefore produce positive effects for DMC3. Cross-reference could be made to proposed policies for community-led housing, and sites may be identified where there is sufficient evidence to do so (DMC4). • Place principles set out by the draft policy text include the requirement for all land uses to make efficient use of land, in line with Urban Living principles and the Local Plan Development Strategy. With proposals required to be developed in a comprehensive/co-ordinated manner, it is considered that this draft policy could provide positive, yet unknown, effects for SA Objective 2 (DMC5). Given the predominantly urban and brownfield nature of the GRA, it is considered that its development and regeneration could produce positive effects for both DMC5 and DMC7, as it would safeguard Green Belt land and not significantly impact greenfield land. As the GRA is within the City Centre, draft Policy UL2 requires that proposals for residential development reflect 200dph as a minimum, which could generate positive effects for DMC6. Effects of this draft policy text against Objective 2 are overall unknown, given that there is potential for both positive and negative effects related to intensification that are unlikely to be known until site-specific proposals come forward. • The Growth and Regeneration Area is adjacent to the wider City Centre boundary. There is relatively limited provision of services within the St Philip’s Marsh boundary itself, and the area is within 800m of Sandy Park Road, Totterdown and Lawrence Hill Local Centres, although this is partly severed by the presence of the River Avon, the A4320 and the Feeder Canal / New Cut in the north (Objective 3, DMC8 and Objective 9, DMC23). Policy text also requires the provision of ‘supporting services and facilities’; which indicates that overall, the effect may be positive but uncertain. • This draft policy is considered to produce unknown effects for DMC9. As the policy text itself does not include the requirement for the development of new community facilities, a net gain of community or community service facilities would be unknown until site-specific proposals are made. • It is considered that this draft policy has the potential to produce significant positive effects for SA Objective 5 (DMC10 and DMC11), as the GRA is located within an area of high deprivation. Development and regeneration of this GRA therefore has the potential to transform the built environment through improved sustainable transport linkages, public realm improvements and offering opportunities for investment in local employment through the provision of workspace. Effects are also partly unknown and remain dependent upon site specific proposals. • The GRA includes areas currently designated as Important Open Space, Sparke Evans Park, which is proposed to be protected as Local Green Space within the Local Plan Review. The draft GRA text also proposes a multi-purpose greenway along the River Avon. Both of these could help maintain / improve positive well-being and healthy lifestyles (DMC13). However, as the area is within an existing AQMA, it is considered that future occupants/users of development within the GRA are likely to be subject to relatively poor air quality, of which is not conducive to good public health; and would therefore require appropriate mitigation. • There are two educational facilities within the GRA boundary, including the Meriton Education and Support Referral Unit and the St Philip’s Marsh Nursery School. Whilst there are two primary schools within 800m of the GRA, walking distances are likely to be longer as a result of severance created by the River Avon, railway infrastructure and Feeder Canal in the north. Better physical connectivity and catchment access to proposals to the north of the GRA should be encouraged, and education provision retained and improved. • This draft policy is considered to produce complex positive effects for SA Objective 8. The policy text requires the provision of high quality office and flexible workspace, alongside industrial and distribution premises to meet the needs of all communities and employers within the City. The sector type of employment/business use is not specified within policy text, and therefore effects of this policy text are uncertain for DMC18. However, provision of high-quality workspaces could support: creative, cultural and digital industries; and financial, business and legal ‘tech’ services as defined within the Local Industrial Strategy, and support the role of Temple Quarter Enterprise Zone as a key employment location. Whilst the area is predominantly in use by Industrial and Warehousing Uses, the GRA is located in an area with a high rate of unemployment. Through reference to enabling access to employment for local residents, this draft policy text could generate positive effects for DMC19, although there is a risk that less-skilled jobs are displaced from this area of the city. This is likely to be further supported by the reference to ensuring the number of jobs in the area is increased; although the policy should seek to set out how this will be monitored. It is uncertain the extent to which this Policy Option would support delivery of carbon neutral employment space, although the accessibility of the areas itself will increase through provisions within the draft policy; this could serve to encourage a shift from unsustainable modes of travel to places of employment (DMC21). • Whilst the GRA does not contain any listed buildings or Conservation Areas, draft policy text does state that ‘new development should facilitate and contribute towards the delivery of an eastern access to Temple Meads station’. As a Grade I listed building, there remains potential for impact of redevelopment or new development on the historic environment (Objective 10, DMC24). However, effects are unknown until site-specific proposals and proposed mitigation come forward. • As the GRA fronts on to the River Frome SNCI and includes two wildlife corridor areas, there is the potential for impacts of development in the absence of appropriate and proportionate ecological mitigation, to be delivered alongside any planning consent within the GRA (DMC25). Whilst the GRA does not contain any statutory designated wildlife sites, it is within an SSSI Impact Zone which predominantly requires consultation with statutory bodies for industrial development that could increase air pollution. While it will be mandated by the forthcoming Environment Bill 2020, the delivery, scale and location of any net gain in biodiversity remains subject to any future development proposal and therefore remains uncertain until this stage (DMC26). • As the Policy Option references the requirement for development to include GI and public realm improvements, it is considered that this Option could therefore generate positive effects for SA Objective 12 (DMC27); however, effects are partly uncertain as the nature of such improvements, and their integration with the existing GI network, remains contingent upon detailed design. • Whilst the Growth and Regeneration Area is located to the south east of Bristol Temple Meads Train Station, accessibility is overall poor within the area. Nearest bus stops are located south of the River Avon along Bath Road or outside the GRA to the north along Kingsland Road, and there is poor accessibility to the south of the station. The draft policy text requires new walking and cycling routes, including to the rest of the city, adjacent neighbourhoods and through a multi-purpose greenway along the River Avon. It also requires improved station access, public transport enhancements and local highways improvements; it is considered that this Growth and Regeneration Area could have a positive effect on the ability to improve access to and quality of sustainable transport modes. • Flood risk within the GRA is considered to be very high, with significant areas located within Flood Risk Zones 2 and 3. While the exact location of new development within the GRA boundary is unknown, the potential for negative effects of development to be impacted by flood risk or create risks elsewhere is considered to be high when appraised against SA Objective 15. The requirement for a Flood Risk Assessment or Sequential Test (as appropriate) could serve to mitigate flood risk issues and ensure that development accounts for future climate change scenarios. In addition, draft policy text requires redevelopment and regeneration of the River Avon frontage to accommodate any flood protection infrastructure; however, it is unclear how this will be delivered if development comes forward in a piecemeal way. The use of SUDS as set out by retained flood risk Policy BCS16 could provide appropriate mitigation for any adverse surface water flood risk at the site. • Whilst the area is not adjacent to groundwater protection zones, it is adjacent to both the River Avon, of which is classified as ‘moderate’ due to chemical imbalances associated with presence of priority hazardous substances. Whilst there is a risk that requiring mixed-use and residential developments within the area could displace recycling businesses, the extent to which this Policy Option would deliver a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production is generally unknown (DMC35, DMC36). Requirement for development to include ‘food systems and infrastructure’ could result in beneficial effects for DMC37, however this remains unknown until further detail is provided. • As set out above, the GRA is located within an existing AQMA which may cause undue exposure of new development and its future occupants to high levels of existing pollutants (DMC38). However, the effects of development are also partly unknown, and remain dependent upon the nature of development (use), alongside the availability and usage of sustainable and/or active travel modes for new development/regeneration to limit the impact of vehicular emissions, alongside any proposed mitigation delivered under Draft Policy HW2. • With the siting of the GRA within a Heat Connection Zone it is considered that there could therefore be opportunities for the use of low carbon and decentralised energy sources (DMC40).
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Draft Policy DS4 Western Harbour Area of Growth and Regeneration

The Western Harbour Area of Growth and Regeneration (GRA) is located to the western end of the City Centre. As the infrastructure gets older and becomes more costly to maintain than it would be to replace, there is an opportunity to remodel the road system in a way that enables the more efficient use of land and the development of a new city quarter.

Key baseline and sustainability issues associated with the GRA are defined as follows:

- The GRA is located within an area of moderate-low deprivation and contains a moderate-low proportion of working-age population who are involuntarily unemployed;
- A significant proportion of the GRA is located within an AQMA, and therefore concentrations of NO₂ and particulate matter (PM₁₀) exceed or potentially exceed national targets;
- The vast majority of the GRA overlaps with the City Docks Conservation Area, which includes several Grade II and Grade II* listed buildings and the Scheduled Monument of Underfall Yard, Bristol Docks. The GRA is also valued for its key role in enabling important views/vistas to and from the Avon Gorge and Clifton Suspension Bridge, within the setting of Ashton Court, Leigh Woods and the Clifton Conservation Area;
- Existing land within the boundary is occupied by industrial and warehousing uses is located to the north of Clift House Road;
- The GRA includes multiple areas of Important Open Space (Land at Jessop Underpass; Cumberland Basin; Land at Clift House Road, Bower Ashton; Cumberland Piazza);
- New Cut Local Nature Reserve is located along the southern embankment of the River Avon, whilst the vast majority of the River Avon within the GRA is identified as SNCI. The GRA is also directly adjacent to the Bower Ashton SNCI;
- The GRA overlaps with existing wildlife network corridors, including: Land between railway line and the River Avon, and Brunel Way and the River Avon; Cumberland Basin; Floating Harbour; and Butterfly Junction;
- The GRA is within a Heat Connection Zone, which therefore offers opportunities for the use of low carbon energy networks/decentralised energy sources within new development; and
- Flood risk within the GRA is high, with large areas of the GRA being located within Flood Risk Zones 2, 3a and 3b (approximately 67%, 10% and 83%, respectively) and with small areas subject to high and medium surface water flood risk. However, it should be noted that the GRA does overlap with the River Avon by approximately 20% which does increase the proportion of flood risk.

Draft Policy DS4 (the 'March 2019 Consultation Option') sets out principles related to the regeneration and development of the Western Harbour GRA; it includes the following requirements:

- A reconfigured and simplified road system;
- Residential development of a minimum capacity of 2,500 with a mix of types, sizes and tenures, and at densities and forms appropriate to achieving this figure;
- A mix of workspace;
- Up to 500 student bedspaces in addition to new homes;
- Retail and leisure development consistent with Retained Policies BCAP13 to BCAP19 or DM7 to DM11;
- Provision of community facilities required to support the residential and student development;

- High quality public open spaces incorporating green infrastructure and public realm enhancements;
- New and improved walking and cycling routes to connect to the development to the surrounding neighbourhoods, public transport facilities and the wider cycle network; and
- Green infrastructure and public realm enhancements including improvements to public open spaces within the area.

In addition, development will be expected to:

- Make efficient use of land and be of a scale and design appropriate to Western Harbour's city centre location;
- Regard the area's important heritage assets and respond appropriately to key views and landmarks set out in the City Docks Conservation Area Appraisal;
- Demonstrate that opportunities have been sought to progress more comprehensive or co-ordinated forms of development with other sites in the locality;
- Provide a network of accessible pedestrian walkways along the Cumberland Basin, Floating Harbour and River Avon New Cut, including new and improved/ restored crossing points, consistent with Retained Policy BCAP32 'Quayside walkways';
- Strengthened pedestrian and cycle links, including wayfinding, between Hotwells, Spike Island, Southville, Ashton Gate and the strategic cycle network;
- Be supported by transport improvements which will include public transport enhancements enhanced connectivity with surrounding areas, cycle provision, pedestrian route improvements and local highway improvements;
- Include an approach to parking provision that reflects the area's central location and connectivity;
- Contribute to an appropriate mix of housing types;
- Be required to include appropriate mitigation to ensure that the risk of flooding is appropriately addressed and does not add to flood risk elsewhere;
- Sites at risk of flooding should be supported by a flood risk sequential test undertaken within the policy area, taking account of all reasonably available sites in the area. The development of sites that are at risk of flooding or are larger than one hectare in size should be supported by a Flood Risk Assessment.

Draft Policy DS4: Western Harbour

SEA Theme	SA Framework Objective	D-M Criteria	Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Short	Medi	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	++/?	++/?	++/?	D	P	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	AM: Set out supporting infrastructure required to ensure that 'at least 2,500' homes is deliverable. MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design. CR: Explicitly state requirement for affordable housing as a percentage, which should be informed by an assessment of viability at the plan-level. CR: Self-build and/or community led housing draft policies and consider sites for the delivery where appropriate evidence exists.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	+/?	+/?	+/?	D	P	Local	As above, plus: R: Brownfield sites and previously developed sites; AG: Local businesses.	AM: Establish level of greenfield land to be maintained within the GRA. MB: Publish masterplan for Western Harbour GRA, to ensure that development creates a comprehensive or coordinated approach consistent with delivering high quality place-making.
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	D	Both	Local	R: Bristol's local economy; Bristol's population AG: Local businesses.	MB: Provide additional detail on the definition of 'facilities and services, including those of a small scale' within the wider GRA
	4. Increase participation in cultural and community activities	DMC9	+/?	+/?	+/?	I	Both	Local	AG: Bristol's population.	MB: Include support for the development of new or enhancement of existing cultural/community facilities, as appropriate.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	-/?	-/?	-/?	Both	Both	Local and City-wide	R: Public health. AG: Bristol's population.	CR: Include reference to retained and draft transport DM policies. AM: Reference to Draft Policy HW2 in relation to mitigation of development proposals within AQMAS. MB: Include detail of specific green infrastructure, pedestrian and cycling connections (i.e. location, responsibility for delivery, cost, phasing) to increase likelihood of delivery.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	+/?	+/?	+/?	Both	Both	Local and City-wide	R: Bristol's population AG: All groups	MB: Ensure physical access to, and catchment access to, existing educational proposals from adjacent neighbourhoods outside the GRA, to increase participation rates in education and skills development.
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	MB: Support delivery of flexible and/or co-working employment space. MB: Include reference to delivery of efficient zero carbon forms of workspace/office space. CR: Reference to transport policies that support delivery of sustainable transport infrastructure for office development. AM: Require proposals for any redevelopment of business use sites to ensure defined quantum of workspace within mixed use developments, to safeguard a range and balance of workspace
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Bristol's local economy; Bristol's population AG: Local businesses	MB: Provide additional detail on the definition of 'facilities and services, including those of a small scale' within the wider GRA
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	--/?	--/?	--/?	I	P	Local and City-wide	R: Cultural heritage; built environment; AG: Bristol's population.	CR: Include reference to existing and proposed design and conservation policies. AM: Provide additional detail within the policy to ensure that development prevents undue harm to designated heritage assets (including the setting of the Conservation Areas, and key views within this).
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	--/?	--/?	--/?	I	P	Local; City-wide; trans-boundary	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM: Reference need to conserve and enhance the natural environment, including the ecological networks associated with the SSCI (River Avon), Local Nature Reserve (New Cut) and Wildlife Network Sites. Provide additional detail on development proposals so as the effect on the SSSI Impact Zone can be considered. AM: Consider removing portion of land within GRA that overlaps with designated LNR.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+/?	+/?	+/?	D	P	Local; City-wide; trans-boundary	As above.	AM: Loss of GI should be replaced where it would enhance cohesive GI network. CR: Existing policy in relation to GI within development. MB: Include reference to: design guidance / exemplar designs in relation to GI provision; any updated strategic GI strategy; location of and responsibilities for delivery.
Transport and Movement	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	AM: Set out the benefits of the reconfiguration of roads for encouraging mode shift. MB: Set out requirement for proportionate public transport contributions/infrastructure provision by developers in conjunction with Draft Policy IDC1.
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	D	P	Local; City-wide; Trans-boundary.	R: Bristol's highway network; public health; Bristol's population.	AM: Set out the effects of highway reconfiguration on the highway network and congestion, and the detail associated with delivery of this scheme.
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	--/?	--/?	--/?	Both	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	AM: Make reference to the Bristol Flood Strategy and implications of this on the Western Harbour area; and require appropriate reference to climate change allowances within flood risk assessments. CR: Retained Policy BCS16.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management.
	17. Minimise air and noise pollution	DMC38	-/?	-/?	-/?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2. AM / CR: Agent of change principles / noise mitigation in relation to: ongoing operations at the material industry areas.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+/?	+/?	+/?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Suggest reference is made to the Heat Connection Zone, with an associated requirement for any future development proposals.

Evaluation of Effects	<p>Scale of effects: The scale of effects of this draft policy would be predominantly attributable to the Growth and Regeneration Area. However, this draft policy would likely have effects upon adjacent land and key receptors, including designated heritage assets and statutory and non-statutory ecological receptors. Through development of this Growth and Regeneration Area, there would also likely be cumulative impacts on the wider Bristol City Centre area including for the delivery of homes and affordable housing, and city-wide effects following possible reconfiguration of the road infrastructure. There could also be cumulative impacts associated with flooding from the River Avon and green infrastructure improvements.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This draft policy could have positive effects for housing delivery with the housing quantum (of ‘at least 2,500 units’) specifically defined within the policy text (DMC1). In absence of JSP policies for affordable housing or in-text references to appropriate levels of affordable housing, assessment of this policy against DMC2 is uncertain. Reference should be made to the appropriate percentage target of affordable housing provision (in accordance with BCS17, DM3 or equivalent) which should be informed by a proportionate assessment of viability at the plan-level. The draft policy text references delivery of purpose-built student accommodation and could therefore produce positive effects for DMC3. Cross-reference could be made to proposed policies for community-led housing, and sites may be identified where there is sufficient evidence to do so (DMC4). • Place principles set out by the draft policy text include the requirement for development to make efficient use of land, in line with Urban Living principles and the Local Plan Development Strategy. With proposals required to include reconfiguration of the road system, and be developed in a comprehensive/co-ordinated manner, it is considered that this draft policy could provide significant positive, yet unknown, effects for SA Objective 2 (DMC5). The GRA does contain areas of land that was previously designated as Important Open Space; whilst the reconfiguration of roads will unlock areas of previously developed land, development of the GRA could also result in some development on greenfield land (DMC5 and DMC7). Being sited within the City Centre, draft Policy UL2 requires that proposals for residential development reflect 200dph as a minimum, which could generate positive effects for DMC6. Effects of this draft policy text against Objective 2 are therefore mixed and overall unknown, given that there is potential for both positive and negative effects related to intensification. • There is limited provision of services within boundary itself, however the area is partially within the wider City Centre boundary, and within 800m walk of Clifton and Bedminster Town Centres, and the North Street and Southville District Centres. The River and Floating Harbour, road infrastructure and topography to the north of the harbour do create severance for some users of services however, and therefore facilities and services should be proportionate to support growth of the community (Objective 3, DMC8 and Objective 9, DMC23). • The GRA contains the Create Centre community hub. However, as the policy text itself does include the provision of community facilities required to support residential and student development, the draft policy could result in a net gain of community or community service facilities. The draft policy is considered to produce positive, albeit unknown effects for DMC9. • The draft policy has the potential to produce positive effects for SA Objective 5 (DMC10 and DMC11), as the GRA is located within an area of moderate-low deprivation. Development and regeneration of this GRA therefore has the potential to transform the built environment through improved sustainable transport linkages, public realm improvements and offering opportunities for investment in local employment through the provision of workspace. Effects are also partly unknown and remain dependent upon site specific proposals. • The GRA includes areas currently designated as Important Open Space, which are not proposed to be protected as Local Green Space within the Local Plan due to the requirement for future highway reconfiguration, however, the GRA is close to a large area of green space (Greville Smyth Park), which have potential to maintain/improve positive well-being and healthy lifestyles (DMC13). As the area is within an existing AQMA, it is considered that future occupants/users of development within the GRA are likely to be subject to relatively poor air quality, which is not conducive to good public health; and would therefore require appropriate mitigation. • While there are no educational facilities within the GRA boundary, it is within walking distance of several educational establishments (including Ashton Gate Primary School and Ashton Park Secondary School). The draft policy could therefore generate positive effects for as there is access to existing establishments; new walking and cycling routes should consider safe accessibility to local schools. • This draft policy is considered to produce positive effects for SA Objective 8 where development is required to provide a mix of workspace (DMC17). The sector type of employment/business use is not specified within policy text, and therefore effects of this policy text are uncertain for DMC18; however, provision of high-quality workspaces could support: creative, cultural and digital industries; and financial, business and legal ‘tech’ services as defined within the Local Industrial Strategy. As the GRA is located in an area with a moderate-low proportion of resident unemployment, it is also considered that this draft text could generate some positive effects for DMC19. It is uncertain the extent to which this Policy Option would support delivery of carbon neutral employment space, although the site itself is relatively accessible by sustainable transport modes (such as Metrobus) and this could serve to encourage a shift from unsustainable modes of travel to places of employment (DMC21). • A significant proportion of the site is located within the City Docks Conservation Area; and there are several listed buildings within the GRA site boundary. These include the Underfall Yard Scheduled Monument, Grade II* Listed Brunel’s South Entrance Lock and Swing Bridge, the Grade II Listed Cumberland Basin and Quay Walls, the Grade II listed A, B and C Bond Warehouses, Grade II Listed Avon Crescent properties amongst many other buildings and Locally Listed Buildings. Alongside the Bower Ashton Conservation Area and Clifton Conservation Area, land within the GRA area plays a key role in enabling important views to and from the Avon Gorge and Clifton Suspension Bridge. Draft policy text requires development proposals to respond to the area’s important heritage assets and townscape features, including key views and landmarks within the City Docks Conservation Area. However, as draft policy text requires development to make efficient use of land within the Western Harbour’s city centre location, there is potential for a cumulative effect on the significance of the designated heritage asset of the Conservation Area itself, Listed Buildings and Scheduled Monument (DMC24). Providing more detail in relation to how development will be expected to come forward in a more comprehensive and coordinated way would allow appropriate assessment of effects and of proposed mitigation. In absence of this detail, effects are also unknown. • The GRA contains a large area of the River Frome SNCI and the Avon New Cut Local Nature Reserve (as it overlaps with the River), and there are several wildlife network corridors within the area. Most larger development proposals, such as residential developments of 50 units or more or any larger non-residential developments, require consultation with the statutory nature conservation bodies as the areas falls within a SSSI impact zone. There is limited reference within the draft policy to conserving and enhancing the natural environment within the GRA, and therefore there is the potential for development to impact these ecological assets in the absence of appropriate and proportionate ecological mitigation (DMC25). While it will be mandated by the forthcoming Environment Bill 2020, the delivery, scale and location of any net gain in biodiversity remains subject to any future development proposal and therefore remains uncertain until this stage (DMC26). • As the draft policy references the requirement for development to include GI, public realm and high quality public open space improvements, it is considered that this draft policy text could therefore generate positive effects for SA Objective 12 (DMC27). However, as the draft policy also does not safeguard existing open spaces, effects are partly uncertain when compared to the current situation. The effects of these improvements, and their integration with the existing GI network, remains contingent upon detailed design. • The Growth and Regeneration Area surrounds the Cumberland Basin road system, which requires reconfiguration and investment within the Plan Period. Draft policy text requires new walking and cycling routes to connect the development to the city centre, surrounding neighbourhoods, public transport facilities and the wider cycle network. Whilst the area currently has mixed levels of accessibility and does benefit from the Metrobus investment, it is considered that this draft text for the Growth and Regeneration Area could have a positive effect on the ability to improve access to and quality of sustainable transport modes. It remains unclear at this stage how reconfiguration of the roads might impact modal shift or effect the existing highway network. • Flood risk within the GRA is considered to be very high, with significant areas located within Flood Risk Zones 2 and 3. While the exact location of new development within the GRA boundary is unknown, the potential for negative effects of development to be impacted by flood risk or create risks elsewhere is considered to be high when appraised against SA Objective 15. The requirement for a Flood Risk Assessment or Sequential Test (as appropriate) could serve to mitigate flood risk issues and ensure that development accounts for future climate change scenarios. The use of SUDS as set out by retained flood risk Policy BCS16 could provide appropriate mitigation for any adverse surface water flood risk at the site. • Whilst the area is not adjacent to groundwater protection zones, it is adjacent to the River Avon, which is classified as ‘moderate’ due to chemical imbalances associated with presence of priority hazardous substances; therefore, effects against DMC34 are uncertain. Moreover, the extent to which this Policy Option would deliver a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production is unknown (DMC35, DMC36); this remains dependent upon the nature of detailed design proposals and compliance with other draft Local Plan policies in relation to climate change and sustainability. • As set out above, the GRA is located within an existing AQMA and as such it is considered that this may cause undue exposure of new development and its future occupants to high levels of existing pollutants (DMC38); however, the effects of development are also partly unknown, and remain dependent upon the proposed land uses, alongside the availability and usage of sustainable and/or active travel modes for new development/regeneration to limit the impact of vehicular emissions, alongside any proposed mitigation delivered under Draft Policy HW2. The GRA is within a Heat Connection Zone, it is considered that there could therefore be opportunities for the use of low carbon and decentralised energy sources (DMC40).
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Draft Policy DS5 Frome Gateway Area of Growth and Regeneration

The Frome Gateway Area of Growth and Regeneration (GRA) is located within the City Centre. It represents the first point of arrival for many visitors into Bristol City Centre.

Key baseline and sustainability issues associated with the GRA are defined as follows:

- The GRA is located within one of the city's highest areas of deprivation and contains a high proportion of working-age population who are involuntarily unemployed;
- The entirety of the GRA is located within an AQMA and therefore concentrations of NO₂ and particulate matter (PM₁₀) exceed or potentially exceed national targets;
- There are two open spaces within the boundary: Riverside Park (proposed to be designated as Local Green Space within the Local Plan) and Peel Street (proposed to be designated as Reserved Open Space within the Local Plan) is within the GRA boundary;
- There are no listed buildings within the GRA, however there are a number of locally-listed buildings and the southern boundary of the GRA is adjacent to the Old Market Conservation Area;
- There are no statutory designations within the GRA, however, land falls within a SSSI Impact Zone;
- Land within the GRA boundary is currently designated as Principal Industrial and Warehousing Land and the south west of the area falls within the Old Market Neighbourhood Development Plan Area;
- The GRA is within a Heat Connection Zone, which therefore offers opportunities for the use of low carbon energy networks/decentralised energy sources within new development;
- Flood risk within the GRA is high, with areas of the GRA being located within Flood Risk Zones 2, 3a and 3b (approximately 61%, 10% and 16%, respectively) and small areas subject to high and medium surface water flood risk; and
- The GRA is adjacent to the River Frome, which is classified by the Environment Agency as 'moderate' water body status, accounting for both ecological and chemical pollutants. According to EA assessment, the water body failed on the 'priority hazardous substances' classification, with traces of mercury and phosphate identified⁷.

Draft Policy DS5 (the 'March 2019 Consultation Option') sets out principles related to the regeneration and development of the Frome Gateway GRA; it includes the following requirements:

- Residential development of a minimum capacity of 1,000 with a mix of types, sizes and tenures, and at densities and forms appropriate to achieving this figure;
- Provision of workspace, providing for a range of business uses, as part of the development mix in the area;
- Up to 500 student bedspaces in addition to the new homes, compliant with Draft Policy H7;
- Retail and leisure development, consistent with Retained Policies BCAP13 to BCAP19 or DM7 to DM11;
- Provision of community facilities required to support the residential and student development;

⁷ <https://environment.data.gov.uk/catchment-planning/WaterBody/GB109053027840>

- New and improved walking and cycling routes to connect to the development to the surrounding neighbourhoods, public transport facilities and the wider cycle network; and
- Green infrastructure and public realm enhancements including improvements to public open spaces within the area.

In addition, development will be expected to:

- Make efficient use of land; and demonstrate that opportunities have been sought to progress more comprehensive or co-ordinated forms of development with other sites in the locality;
- Provide strengthened pedestrian and cycle links between St. Paul's, St. Jude's and Easton;
- Contribute to a mix of uses;
- Newfoundland Way enhanced as a mixed-use city street providing an improved approach to Bristol City Centre for all road users, including the provision of footways and tree planting;
- New crossings over Newfoundland Way and the River Frome consistent with Retained Policy BCAP24 'The St. Paul's Green Link';
- An enhanced bridge crossing over Newfoundland Way, together with improvements in the east-west walking route through Riverside Park and Peel Street Green Space, natural surveillance being provided through frontage development wherever possible;
- Enhanced connections between the underpass at Junction 3 and Pennywell Road;
- Enhancement of the River Frome as a townscape feature, pedestrian route and green infrastructure corridor providing benefits for wildlife and sustainable drainage, including a network of accessible pedestrian walkways along the River Frome consistent with Retained Policy BCAP32 'Quayside walkways';
- Be supported by transport improvements which will include public transport enhancements, enhanced connectivity with surrounding areas, cycle provision, pedestrian route improvements and local highway improvements;
- Include an approach to parking provision that reflects the area's central location and connectivity;
- Contribute to an appropriate mix of housing types; and
- Development of sites at risk of flooding now or with climate change should be supported by a flood risk sequential test undertaken within the policy area, taking account of all reasonably available sites in the area. The development of sites that are at risk of flooding or are larger than one hectare in size should be supported by a Flood Risk Assessment.

Draft Policy DS5: Frome Gateway

SEA Theme	SA Framework Objective	D-M Criteria	Assessment of Sustainability Effects						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	++/?	++/?	++/?	D	p	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design. CR: Explicitly state requirement for affordable housing as a percentage, which should be informed by an assessment of viability at the plan-level. CR: Self-build and/or community led housing draft policies and consider sites for the delivery where appropriate evidence exists.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	+/?	+/?	+/?	D	p	Local	As above, plus: R: Brownfield sites and previously developed sites; AG: Local businesses.	AM: Establish level of greenfield land to be maintained within the GRA (including future form of Peel Street). MB: Publish BCC Spatial Framework for Frome Gateway GRA, to ensure that development creates a comprehensive or coordinated approach consistent with delivering high quality place-making.
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	D	Both	Local	R: Bristol's local economy; Bristol's population; AG: Local businesses.	MB: Provide additional detail on the definition of 'retail and leisure development' in the wider GRA.
	4. Increase participation in cultural and community activities	DMC9	+/?	+/?	+/?	I	Both	Local	AG: Bristol's population.	MB: In addition to 'provision of community facilities', include support for enhancement of existing establishments.
	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	++/?	++/?	++/?	I	Both	Local and City-wide.	R: Built environment; AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	-/?	-/?	-/?	Both	Both	Local and City-wide	R: Public health. AG: Bristol's population.	CR: Include reference to retained and draft transport DM policies. AM: Reference to Draft Policy HW2 in relation to mitigation of development proposals within AQMAS. MB: Include detail of specific green infrastructure, pedestrian and cycling connections (i.e. location, responsibility for delivery, cost, phasing) to increase likelihood of delivery.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	+/?	+/?	+/?	Both	Both	Local and City-wide	R: Bristol's population AG: All groups	MB: Ensure physical access to, and catchment access to, educational establishments outside the GRA, to increase participation rates in education and skills development.
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy; AG: Local businesses, Bristol's population.	MB: Support delivery of flexible and/or co-working employment space. MB: Include reference to delivery of efficient zero carbon forms of workspace/office space. CR: Reference to transport policies that support delivery of sustainable transport infrastructure for office development; and Draft Policy E1 'Inclusive economic development'. AM: Require proposals for any redevelopment of business use sites to ensure defined quantum of workspace within mixed use developments, to safeguard a range and balance of workspace.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local.	R: Bristol's local economy; Bristol's population AG: Local businesses	MB: Ensure that retail service provision follows the retail hierarchy for the area. Provide additional detail on the definition of 'retail and leisure development' in the wider GRA.
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	0	0	0	I	P	Local and City-wide	R: Cultural heritage; built environment; AG: Bristol's population.	n/a
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	P	Local; City-wide; Trans-boundary	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	MB: Reference need to conserve and enhance ecological and nature networks associated with the River Frome.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+/?	+/?	+/?	D	P	Local and City-wide.	As above.	AM: Loss of GI should be replaced where it would enhance a cohesive GI network. CR: Existing policy in relation to GI within development. MB: Include reference to: design guidance / exemplar designs in relation to GI provision; any updated strategic GI strategy; location of and responsibilities for delivery.
Transport and Movement	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local; City-wide Trans-boundary.	R: Public health; AG: Bristol's population.	MB: Set out requirement for proportionate public transport contributions/infrastructure provision by developers in conjunction with Draft Policy IDC1. MB: Set out detail associated with proposals for Newfoundland Way as a mixed-use city street.
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	D	P	Local; City-wide Trans-boundary.	R: Bristol's highway network; public health; Bristol's population.	MB: Set out detail associated with new crossing over Newfoundland Way and implications for congestion in the area.
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	--/?	--/?	--/?	Both	Both	Local; City-wide Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	AM: Make reference to the Bristol Flood Strategy and implications of this on the River Frome; and require appropriate reference to climate change allowances within sequential test and flood risk assessments. CR: Retained Policy BCS16.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management.
	17. Minimise air and noise pollution	DMC38	-/?	-/?	-/?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2. AM / CR: Agent of change principles / noise mitigation in relation to: existing cultural venues within the area; evening economy uses; and proposals for providing natural surveillance for a crossing of Newfoundland Way.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+/?	+/?	+/?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Suggest reference is made to the Heat Connection Zone, with an associated requirement for any future development proposals.

Evaluation of Effects	<p>Scale of effects: The scale of effects of this draft policy would be predominantly attributable to the Growth and Regeneration Area. However, this draft policy could have effects upon adjacent land and key receptors without appropriate mitigation (including existing community facilities, and receptors vulnerable to flood risk and poor air quality). Through development of this Growth and Regeneration Area, there would also likely be cumulative impacts on the wider Bristol City Centre area, including for the delivery of affordable housing, and employment opportunities, the local transport network, heat network and localised energy demands, amongst other key sustainability issues.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This draft policy could have positive effects for housing delivery, and the quantum of ‘at least 1,000 new homes’ is specified within policy text (DMC1). In absence of JSP policies for affordable housing or in-text references to appropriate levels of affordable housing, assessment of this policy against DMC2 is uncertain. Reference should be made to the appropriate percentage target of affordable housing provision (in accordance with BCS17, DM3 or equivalent) which should be informed by a proportionate assessment of viability at the plan-level. The draft policy text references delivery of purpose-built student accommodation and could therefore produce positive effects for DMC3. Cross-reference could be made to proposed policies for community-led housing, and sites may be identified where there is sufficient evidence to do so (DMC4). • Place principles set out by the draft policy text include the requirement for development to make efficient use of land, in line with Urban Living principles and the Local Plan Development Strategy. With proposals required to be developed in a comprehensive/co-ordinated manner, it is considered that this draft policy could provide positive, yet unknown, effects for SA Objective 2 (DMC5). Given the predominantly urban and brownfield nature of the GRA, it is considered that its development and regeneration could produce positive effects for both DMC5 and DMC7, subject to Peel Street and Riverside Park open spaces being retained. As the GRA is within the Inner Urban Area, draft Policy UL2 requires that proposals for residential development reflect 120dph as a minimum, which could generate positive effects for DMC6. Effects of this draft policy text against Objective 2 are overall unknown, given that there is potential for both positive and negative effects related to intensification that are unlikely to be known until site-specific proposals come forward. • There is almost no provision of services within the boundary itself, however the GRA is within the wider City Centre boundary, and is within 800m walk of Stapleton District Centre, Mina Road, Picton Street, St Marks Road, Lawrence Hill and Ashley Road Local Centres (Objective 3 DMC8 and Objective 9). Centres to the north of Newfoundland Road (A4032) are severed by the road infrastructure, however, this is likely to be mitigated in some form by the enhanced pedestrian and cycling links with adjacent neighbourhoods. In addition, draft policy text requires the development of retail and leisure development consistent with BCAP13 to BCAP19 or DM7 to DM11. • The GRA currently contains the Riverside Youth Project Centre and a number of other community and cultural uses within the area. The draft policy requires provision of community facilities to support residential and student development, alongside having regard to policies within the Old Market Neighbourhood Plan. Therefore, the effect against this Objective could be positive but uncertain. • It is considered that this draft policy has the potential to produce positive effects for SA Objective 5 (DMC10 and DMC11), as the GRA is located within an area of high deprivation (based upon 2019 IMD Data). Development and regeneration of this GRA therefore has the potential to transform the built environment through improved sustainable transport linkages, public realm improvements and offering opportunities for investment in local employment through the provision of workspace. Effects are also partly unknown and remain dependent upon site specific proposals. • The GRA includes areas currently designated as Important Open Space, Riverside Park (proposed to be protected as Local Green Space within the Local Plan) and Peel Street (which is protected as a Reserved Open Space), which has potential to maintain/improve positive well-being and healthy lifestyles (DMC13). The area is within an existing AQMA; therefore future occupants/users of development are likely to be subject to relatively poor air quality which would therefore require appropriate mitigation. • While there are no educational facilities within the GRA boundary, it is within walking distance of several educational establishments such as St Nicholas of Tolentine Catholic Primary School (south of Pennywell Road) and secondary schools in St Agnes, Lawrence Hill and Gloucester Road. Provision is beyond existing A-roads and therefore ensuring delivery of physical accessibility, through connections across Newfoundland Way or school travel plans, will be essential. This draft policy could generate positive effects for Objective 7 DMC16, subject to achieving this connectivity. • This draft policy is considered to produce positive effects for SA Objective 8 where development is required to provide high quality workspace (DMC17). The sector type of employment/business use is not specified within policy text, and therefore effects of this policy text are uncertain for DMC18; however, provision of high-quality workspaces could support: creative, cultural and digital industries; and financial, business and legal ‘tech’ services as defined within the Local Industrial Strategy. As the GRA is located in an area with a high proportion of working-age population who are involuntarily unemployed, it is also considered that this draft text could generate positive effects for DMC19. It is uncertain the extent to which this Policy Option would support delivery of carbon neutral employment space, although the site itself is accessible by sustainable transport modes and this could serve to encourage a shift from unsustainable modes of travel to places of employment (DMC21). • The River Frome runs through the centre of the GRA. Although this waterbody does not carry the statutory ecological designations of the River Avon, there is the potential for impacts of development in the absence of appropriate and proportionate ecological mitigation (DMC25). The delivery, scale and location of any net gain in biodiversity remains subject to any future development proposal and therefore remains uncertain until this stage (DMC26). • As the draft policy references the requirement for development to include GI and public realm improvements, it is considered that it could therefore generate positive effects for SA Objective 12 (DMC27). However, effects are partly uncertain as the nature of such improvements, and their integration with the existing GI network, remains contingent upon detailed design. • Flood risk within the GRA is considered to be high, with significant areas located within Flood Risk Zones 2 and 3. While the exact location of new development within the GRA boundary is unknown, the potential for negative effects of development to be impacted by flood risk or create risks elsewhere is considered to be high when appraised against SA Objective 15. The requirement for a Flood Risk Assessment or Sequential Test (as appropriate) could serve to mitigate flood risk issues and ensure that development accounts for future climate change scenarios. The use of SUDS as set out by retained flood risk Policy BCS16 could provide appropriate mitigation for any adverse surface water flood risk at the site. • The Growth and Regeneration Area lies within the wider City Centre boundary, and is located between the Newfoundland Way, which is a gateway into the city centre, and Lawford Gate, which benefits from frequent bus services into the city (24, 48A, 49). Whilst the majority of the GRA therefore benefits from relatively high levels of accessibility, Pennywell Road itself does not have any direct public transport access which results in poorer accessibility to the north of the area. To encourage a mode shift and reduce the need to travel, the draft policy text does require development to provide a range of workspaces alongside residential uses, new walking and cycling routes to connect to the city centre, an enhanced bridge crossing over the Newfoundland Way, enhanced connections between the underpass at Junction 3 and Pennywell Road, and enhancement of the River Frome as a townscape feature. Overall, it is considered that this draft text for the Growth and Regeneration Area could have a positive effect on the ability to improve access to and quality of sustainable transport modes, however transport modelling of proposals should take place. • Whilst is not adjacent to any groundwater protection zones, it is adjacent to the River Frome, which is classified by the Environment Agency catchment data as ‘moderate’ in water body status. Effects against DMC34 are therefore uncertain. Moreover, the extent to which this draft policy would deliver a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production is unknown (DMC35, DMC36); this remains dependent upon the nature of detailed design proposals and compliance with other draft Local Plan policies in relation to climate change and sustainability. • As set out above, the GRA is located within an existing AQMA and as such it is considered that this may cause undue exposure of new development and its future occupants to high levels of existing pollutants (DMC38); however, the effects of development are also partly unknown, and remain dependent upon the proposed land use, alongside the availability and usage of sustainable and/or active travel modes for new development/regeneration to limit the impact of vehicular emissions, alongside any proposed mitigation delivered under Draft Policy HW2. Reference should be had to ‘agent of change’ principles and existing noise-generating uses (such as cultural venues). • The GRA is within a Heat Connection Zone it is considered that there could therefore be opportunities for the use of low carbon and decentralised energy sources (DMC40).
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Draft Policy DS6 Lawrence Hill Growth and Regeneration Area

The Lawrence Hill Area of Growth and Regeneration (GRA) is located within East Bristol. Between Lawrence Hill and Central Fishponds, the Draft Local Plan proposes a minimum of 5,000 new homes.

Key baseline and sustainability issues associated with the GRA are defined as follows:

- The GRA is located within one of the city's highest areas of deprivation and contains a high proportion of working-age population who are involuntarily unemployed;
- The entirety of the GRA is located within an AQMA and therefore concentrations of NO₂ and particulate matter (PM₁₀) exceed or potentially exceed national targets;
- There are several small public open spaces within the GRA boundary, many of which are proposed to be retained as Reserved Open Space (including the Bristol and Bath Railway Path, the Brixton Road Amenity Area, and Land adjacent to the railway line) or Local Green Space (such as Bannerman Road Park and Gaunts Ham Park). Several areas that were previously designated as Important Open Space (IOS) are no longer completely retained as such, for example, the Lawrence Hill Roundabout was previously the largest IOS within the GRA and is no longer designated;
- The GRA partially overlaps with an SNCI (Easton-Staple Hill Disused Railway) and land designated as a wildlife corridor (Railway land Easton Rd to Stapleton Rd);
- Land within the GRA boundary is currently designated as Principal Industrial and Warehousing Area;
- The Old Market Conservation Area is located on the western boundary of the GRA, however is not overlapping with the GRA itself;
- A small proportion of the GRA is within a Heat Connection Zone (approximately 5%), which therefore offers some opportunities for the use of low carbon energy networks/decentralised energy sources within new development; and
- Flood risk within the GRA is low, with the majority of the GRA being located within Flood Risk Zone 1 and with small areas subject to high and medium surface water flood risk (approximately 5% and 7%, respectively).

Draft Policy DS6 (the 'March 2019 Consultation Option') sets out principles related to the regeneration and development of the Lawrence Hill GRA; it includes the following requirements:

- Residential development of a minimum capacity of 2,500 with a mix of types, sizes and tenures, and at densities and forms appropriate to achieving this figure;
- Provision of high-quality workspace, providing for a range of business uses, as part of the development mix in the area;
- Retail and leisure development consistent with Retained Policies DM7 to DM11;
- Provision of community facilities required to support the residential development;
- New and improved walking and cycling routes to connect to the development to the surrounding neighbourhoods, public transport facilities and the wider cycle network;
- Public transport improvements, including to Lawrence Hill and Stapleton Road and improved facilities at Lawrence Hill Railway Station; and
- Green infrastructure and public realm enhancements including improvements to public open spaces within the area.

In addition, development will be expected to:

- Make efficient use of land; and demonstrate that opportunities have been sought to progress more comprehensive or co-ordinated forms of development with other sites in the locality;
- Be of a scale and design appropriate to Lawrence Hill's location close to the City Centre. As part of this, tall buildings in the right setting and of the right design may be appropriate as part of the overall approach to development (Draft Policy DC2 'Tall buildings');
- Where proposed between Croydon Street and Lawrence Hill Station, development should create a connected and well-designed community, incorporating new pedestrian and cycle links between Lawrence Hill, the Bristol & Bath Railway Path and Easton Road;
- Provide for other new and/or improved pedestrian and cycle links: across the A4320, particularly at Lawrence Hill and Easton Road; and to and from the Bristol and Bath Railway Path, including links to the Dings Cycle Path;
- Provide active ground floor uses focused on Lawrence Hill and Church Road;
- Be supported by transport improvements which will include public transport enhancements enhanced connectivity with surrounding areas, cycle provision, pedestrian route improvements and local highway improvements;
- Provide for an appropriate form and amount of new workspace as part of the mix of uses in the area, where sites currently or recently used for business purposes are proposed to be redeveloped for other uses; and
- Contribute to an appropriate mix of housing types.

The policy sets out that where sites are developed, a density of 120dph will be sought as a minimum, but higher densities of 200dph may be appropriate, subject to a co-ordinated approach to development which delivers quality urban design.

In addition, the draft policy states that should the opportunity arise to reconfigure Lawrence Hill Roundabout within the plan period, new development will be sought to a layout and mix of uses that reconnects the communities of Easton, Lawrence Hill, Newtown and Old Market and provides onward links to Bristol City Centre.

Draft Policy DS6: Lawrence Hill

SEA Theme	SA Framework Objective	D-M Criteria	Assessment of Sustainability Effects						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	++/?	++/?	++/?	D	p	Local and City-wide	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design. CR: Explicitly state requirement for affordable housing as a percentage, which should be informed by an assessment of viability at the plan-level. CR: Self-build and/or community led housing draft policies and consider sites for the delivery where appropriate evidence exists.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	+/?	+/?	+/?	D	p	Local	As above, plus: R: Brownfield sites and previously developed sites; AG: Local businesses.	MB: Publish masterplan for Lawrence Hill GRA, to ensure that development creates a comprehensive or coordinated approach consistent with delivering high quality place-making.
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	D	Both	Local	R: Bristol's local economy; Bristol's population; AG: Local businesses.	MB: Provide additional detail on the definition of 'retail and leisure development' in the wider GRA.
	4. Increase participation in cultural and community activities	DMC9	+/?	+/?	+/?	I	Both	Local	AG: Bristol's population.	MB: In addition to 'provision of community facilities', include support for enhancement of existing establishments.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	++/?	++/?	++/?	I	Both	Local and City-wide.	R: Built environment; AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	-/?	-/?	-/?	Both	Both	Local and City-wide	R: Public health; AG: Bristol's population.	CR: Include reference to retained and draft transport DM policies. AM: Reference to Draft Policy HW2 in relation to mitigation of development proposals within AQMAS. MB: Include detail of specific pedestrian and cycling connections (i.e. location, responsibility for delivery, cost, phasing) to increase likelihood of delivery.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	+/?	+/?	+/?	Both	Both	Local and City-wide	R: Bristol's population; AG: All groups.	MB: Ensure physical access to, and catchment access to, educational establishments outside the GRA, to increase participation rates in education and skills development.
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	AM: Ensure the delivery of a range of business uses by explicitly setting out the floorspace ratio for each B use class on a site basis. MB: Support delivery of flexible and/or co-working employment space and include reference to delivery of efficient zero carbon forms of workspace/office space. CR: Reference to transport policies that support delivery of sustainable transport infrastructure for office development; and Draft Policy E1 'Inclusive economic development'. AM: Require proposals for any redevelopment of business use sites to ensure defined quantum of workspace within mixed use development uses, to safeguard a range and balance of workspace.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Bristol's local economy; Bristol's population; AG: Local businesses.	MB: Ensure that retail service provision follows the retail hierarchy for the area.
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	0/?	0/?	0/?	I	P	Local.	R: Cultural heritage; built environment; AG: Bristol's population.	AM: Take account of designated heritage assets (such as the Old Market Conservation Area and listed buildings), particularly in relation to tall building proposals.
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	-/?	-/?	-/?	I	P	Local and City-wide;	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM: Reference need to conserve and enhance ecological networks associated with SNCI (Easton-Staple Hill Disused Railway) and land designated as a wildlife corridor (Railway land Easton Rd to Stapleton Rd).
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+/?	+/?	+/?	D	P	Local; City-wide;	As above.	AM: Require loss of GI to be replaced where it would enhance cohesive GI network. CR: Existing policy in relation to GI within development. MB: Include reference to: design guidance / exemplar designs in relation to GI provision; any updated strategic GI strategy; location of and responsibilities for delivery.
Transport and Movement	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Public health; AG: Bristol's population and transport providers.	MB: Set out requirement for proportionate public transport contributions/infrastructure provision by developers in conjunction with Draft Policy IDC1. AM: Set out detail (including responsibilities, delivery, location, and phasing) of pedestrian and cycle links.
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	D	P	Local and City-wide.	R: Bristol's highway network; public health; AG: Bristol's population.	AM: Set out the detail (including responsibilities for delivery, phasing, location and costs) associated with public transport improvements along Lawrence Hill and Stapleton Road, and to facilities at Lawrence Hill Railway Station.
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	0/?	0/?	0/?	Both	Both	Local.	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Include reference to latest climate change projections for flood risk. CR: Retained Policy BCS16.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management.
	17. Minimise air and noise pollution	DMC38	-/?	-/?	-/?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+/?	+/?	+/?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Suggest reference is made to the Heat Connection Zone, with an associated requirement for any future development proposals.

Evaluation of Effects	<p>Scale of effects: The scale of effects of this draft policy would be predominantly attributable to the Growth and Regeneration Area. However, this draft policy would likely have effects upon adjacent land and key receptors, such as the SNCI and wildlife corridor. Through development of this Growth and Regeneration Area, there would also likely be cumulative impacts on the wider East Bristol area, including for the delivery of affordable housing, and employment opportunities, the local transport network, heat network and localised energy demands, and waste management, amongst other key sustainability issues.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This draft policy could have positive effects for housing delivery, and the quantum of ‘at least 2,500 new homes’ is specified within policy text (DMC1). In absence of JSP policies for affordable housing or in-text references to appropriate levels of affordable housing, assessment of this policy against DMC2 is uncertain. Reference should be made to the appropriate percentage target of affordable housing provision (in accordance with BCS17, DM3 or equivalent) which should be informed by a proportionate assessment of viability at the plan-level. Cross-reference could be made to proposed policies for community-led housing, and sites may be identified where there is sufficient evidence to do so (DMC4). • Place principles set out by the draft policy text include the requirement for development to make efficient use of land, in line with Urban Living principles and the Local Plan Development Strategy. With proposals required to be developed in a comprehensive/co-ordinated manner, it is considered that this draft policy could provide positive, yet unknown, effects for SA Objective 2 (DMC5). Although some land previously designated as IOS is no longer retained as such, the predominantly urban and brownfield nature of the GRA does mean that its development and regeneration could produce positive effects for both DMC5 and DMC7. Located within the Inner Urban Area, draft Policy UL2 requires that proposals for residential development reflect 120dph as a minimum, which could generate positive effects for DMC6. Effects of this draft policy text against Objective 2 are overall unknown, given that there is potential for both positive and negative effects related to intensification that are unlikely to be known until site-specific proposals come forward. • There is some provision of services within the boundary itself, including a Community Centre (Phoenix Social Centre), Post Office, Cashmore Early Years Centre, alongside the Lawrence Hill Local Centre itself. The GRA is also within 800m walk of St George (Church Road) Town Centre, the Stapleton Road District Centre and the Mina Road, St Marks Road and Ashley Road / Grosvenor Road Local Centres Objective 3 DMC8 and Objective 9). Access to these services is somewhat severed by location along a busy A-road and location of the larger industrial area in the centre of the GRA and major infrastructure – redevelopment of these sites for mixed uses and provision of new cycling and walking may increase accessibility. In addition, draft policy text requires the development of retail and leisure development consistent with DM7 to DM11, and active ground flood uses focused around Lawrence Hill and Church Road. Effects are therefore beneficial for these two objectives but unknown. • The GRA currently contains the Phoenix Social Centre, and is directly adjacent to a number of other facilities (such as the Easton Community Children’s Centre). The draft policy also requires provision of community facilities to support residential development, however it could also require enhancement of existing facilities. Therefore, the effects against this Objective are likely to be positive, but unknown. • The draft policy has the potential to produce positive effects for SA Objective 5 (DMC10 and DMC11), as the GRA is located within an area of high deprivation (based upon 2019 IMD Data). Development of this GRA therefore has the potential to transform the built environment through improved sustainable transport linkages, public realm improvements and offering opportunities for investment in local employment through the provision of workspace. Effects are also partly unknown and remain dependent upon site specific proposals. • Whilst the GRA does contain a number of small proposed Local Green Spaces and Reserved Open Spaces, which have potential to maintain/improve positive well-being and healthy lifestyles (DMC13), there are several previously designated Important Open Spaces which are no longer retained. As the whole area is within an existing AQMA, it is considered that future occupants/users of development within the GRA are likely to be subject to relatively poor air quality, of which is not conducive to good public health; and would therefore require appropriate mitigation. • While there are no educational facilities within the GRA boundary, it is within 800m walking distance of several educational establishments, including the Barton Hill Academy primary school in the south, Bannerman Road Primary School in the north, and the City Academy secondary school in the east. The draft policy could therefore generate positive effects for DMC16 as it is considered that there is a high level of physical accessibility to existing surrounding educational facilities. • This draft policy is considered to produce positive effects for SA Objective 8 where development is required to provide high quality workspace including a range of business uses (DMC17). The sector type of employment/business use is not specified within policy text, and therefore effects of this policy text are uncertain for DMC18; however, provision of high-quality workspaces could support: creative, cultural and digital industries; and financial, business and legal ‘tech’ services as defined within the Local Industrial Strategy. As the GRA is located in an area where a high proportion of working-age population are involuntarily unemployed, it is also considered that this draft policy could generate positive effects for DMC19. The extent to which this Policy Option would support delivery of carbon neutral employment space is uncertain, although the site itself is accessible by sustainable transport modes and this could serve to encourage a shift from unsustainable modes of travel to places of employment (DMC21). • The GRA does not contain any designated Conservation Area, however it is adjacent to the Old Market Conservation Area and does contain a number of Grade II listed buildings in the north of the GRA along All Hallow Road. As such, there does remain potential for impact of redevelopment or new development on the setting of these listed buildings (DMC24), particularly in locations where tall buildings are proposed. Effects are likely to be localised to that part of the GRA, but unknown until detailed design phases. Effects overall, at a GRA level, are more likely to be neutral. • As the site includes a small proportion of land designated as an SNCI and wildlife corridor land, there is the potential for impacts of development in the absence of appropriate and proportionate ecological mitigation (DMC25). Whilst the GRA does not contain any statutory designated wildlife sites, it is within an SSSI Impact Zone which predominantly requires consultation with statutory bodies for industrial development that could increase air pollution. The delivery, scale and location of any net gain in biodiversity is subject to future development proposals and therefore remains uncertain (DMC26). • As the draft policy references the requirement for development to include GI and public realm improvements, it is considered that this Option could therefore generate positive effects for SA Objective 12 (DMC27); however, effects are partly uncertain as the nature of such improvements, and their integration with the existing GI network, remains contingent upon detailed design. • The Growth and Regeneration Area surrounds Lawrence Hill Station is adjacent to the Bristol and Bath cycle path, and surrounds public transport routes (Church Road, Easton Road and Whitehall Road). To encourage a mode shift and reduce the need to travel, the draft policy text requires development to provide a range of workspaces and business uses alongside residential uses, new walking and cycling routes to connect to neighbourhoods and the wider cycle network, public transport improvements defined within the policy text and green infrastructure improvements. It is considered that this draft text for the Growth and Regeneration Area could have a positive effect on the ability to improve access to and quality of sustainable transport modes (DMC28), whilst public transport improvements along Lawrence Hill and Stapleton Road may improve the existing highway network (DMC29). • Flood risk within the GRA is considered to be low, being predominantly located within Flood Risk Zone 1. While the exact location of new development within the GRA boundary is unknown, it is considered that the potential for effects of development/regeneration for local flood risk is therefore relatively low when appraised against SA Objective 15. The use of SUDS as set out by retained flood risk Policy BCS16 could provide appropriate mitigation for any adverse surface water flood risk at the site. • Given that the area is not adjacent to vulnerable water bodies or groundwater protection zones, effects against DMC34 are neutral. Moreover, the extent to which this draft policy would deliver a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production is unknown (DMC35, DMC36); this remains dependent upon the nature of detailed design proposals and compliance with other draft Local Plan policies in relation to climate change and sustainability. • As set out above, the GRA is located within an existing AQMA and as such it is considered that this may cause undue exposure of new development and its future occupants to high levels of existing pollutants (DMC38); however, the effects of development are also partly unknown, and remain dependent upon the nature of development (use), alongside the availability and usage of sustainable and/or active travel modes for new development/regeneration to limit the impact of vehicular emissions, alongside any proposed mitigation delivered under Draft Policy HW2. • With the siting of the GRA within a Heat Connection Zone it is considered that there could therefore be opportunities for the use of low carbon and decentralised energy sources (DMC40).
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Draft Policy DS7 Central Fishponds Area of Growth and Regeneration

The Central Fishponds Area of Growth and Regeneration (GRA) is located within East Bristol. Between Lawrence Hill and Central Fishponds, the Draft Local Plan proposes a minimum of 5,000 new homes.

Key baseline and sustainability issues associated with the GRA are defined as follows:

- The GRA is located within an area of moderate-high deprivation and is an area that has a moderate-high proportion of working-age population who are involuntarily unemployed;
- Approximately a fifth of the GRA is located within an AQMA and therefore concentrations of NO₂ and particulate matter (PM₁₀) exceed or potentially exceed national targets;
- An Important Open Space, the Bristol Bath Railway Path (proposed to be designated as Reserved Open Space within the Local Plan), is within the GRA boundary. There are no other open spaces within the area;
- The GRA partially overlaps with an SSSI (Easton-Staple Hill Disused Railway). There are no statutory ecological designations within the area;
- The GRA is bounded by Stapleton and Frome Valley Conservation Area at the north, and includes a small overlap with this Conservation Area off New Station Road;
- Land currently designated as Principal Industrial and Warehousing Area is located to the north and south of New Station Way, within the GRA boundary; however, evidence indicates that this is underutilised; and
- Flood risk within the GRA is low, as the area is located within Flood Risk Zone 1 and with small areas subject to high and medium surface water flood risk (approximately 4% and 5%, respectively).

Draft Policy DS7 (the 'March 2019 Consultation Option') sets out principles related to the regeneration and development of the Fishponds GRA; it includes the following requirements:

- Residential development of a minimum capacity of 1,500 with a mix of types, sizes and tenures, through a combination of existing allocated sites and new development opportunities, and at densities and forms appropriate to achieving this figure;
- Provision of high-quality workspace, providing for a range of business uses, as part of the development mix in the area;
- Retail and leisure development consistent with Retained Policies DM7 to DM11;
- Provision of community facilities required to support the residential development;
- New and improved walking and cycling routes to connect to the development to the surrounding neighbourhoods, public transport facilities and the wider cycle network; and
- Green infrastructure and public realm enhancements including improvements to public open spaces within the area.

In addition, development will be expected to:

- Make efficient use of land; and demonstrate that opportunities have been sought to progress more comprehensive or co-ordinated forms of development with other sites in the locality;
- Be of a scale and design appropriate to Central Fishpond's town centre location, taking account of the Stapleton and Frome Valley Conservation Area. As part of this, tall buildings in the right

setting and of the right design may be appropriate as part of the overall approach to development (Draft Policy DC2 'Tall buildings');

- In the Goodneston Road area, create a connected and well-designed community, incorporating new pedestrian and cycle links between Fishponds Road, the Bristol and Bath Railway Path and the Lodge Causeway area to the south;
- Provide active ground floor uses focused on Fishponds Town Centre and its principal approaches;
- Be supported by transport improvements which will include public transport enhancements enhanced connectivity with surrounding areas, cycle provision, pedestrian route improvements and local highway improvements;
- Provide for an appropriate form and amount of new workspace as part of the mix of uses in the area, where sites currently or recently used for business purposes are proposed to be redeveloped for other uses;
- Contribute to an appropriate mix of housing types; and,
- The policy sets out that where sites are developed, a density of 100dph will be sought as a minimum, but higher densities may be appropriate, subject to a co-ordinated approach to development which delivers quality urban design.

Draft Policy DS7: Central Fishponds

SEA Theme	SA Framework Objective	D-M Criteria	Assessment of Sustainability Effects						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	++/?	++/?	++/?	D	p	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design. CR: Explicitly state requirement for affordable housing as a percentage, which should be informed by an assessment of viability at the plan-level. CR: Self-build and/or community led housing draft policies and consider sites for the delivery where appropriate evidence exists.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	++/?	++/?	++/?	D	p	Local	As above, plus: R: Brownfield sites and previously developed sites; AG: Local businesses.	MB: Publish masterplan for the area to ensure that development creates a comprehensive or coordinated approach consistent with delivering high quality place-making.
	3. Ensure easy and affordable access to key services	DMC8	++/?	++/?	++/?	D	Both	Local	R: Bristol's local economy; Bristol's population AG: Local businesses.	MB: Provide additional detail on the definition of 'retail and leisure development' in the wider GRA.
	4. Increase participation in cultural and community activities	DMC9	+/?	+/?	+/?	I	Both	Local	AG: Bristol's population.	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	-/?	-/?	-/?	Both	Both	Local and City-wide	R: Public health. AG: Bristol's population.	CR: Include reference to retained and draft transport DM policies. AM: Reference to Draft Policy HW2 in relation to mitigation of development proposals within AQMAs. MB: Include detail of specific pedestrian and cycling connections (i.e. location, responsibility for delivery, cost, phasing).
Health and Inequalities	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	+/?	+/?	+/?	Both	Both	Local and City-wide	R: Bristol's population. AG: All groups.	MB: Ensure physical access to, and catchment access to, existing education establishments in neighbourhoods adjacent to the GRA, to increase participation rates in education and skills development.
	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	MB: Support delivery of flexible and/or co-working employment space; and ensure the delivery of a range of business uses by explicitly setting out the floorspace ratio for each B use class on a site basis. MB: Include reference to delivery of efficient, zero carbon forms of workspace/office space. CR: Reference to transport policies that support delivery of sustainable transport infrastructure for office development. AM: Require proposals for any redevelopment of business use sites to ensure defined quantum of workspace within mixed use development uses, to safeguard a range and balance of workspace.
Economy and Employment	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Bristol's local economy; Bristol's population AG: Local businesses	MB: Provide additional detail on the definition of 'retail and leisure development' in the wider GRA.
	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local.	R: Cultural heritage; built environment; AG: Bristol's population.	CR: Include reference to existing and draft design and conservation policies. AM: Take account of designated heritage assets (such as the Stapleton and Frome Valley Conservation Area and listed buildings), particularly in relation to tall building proposals. MB: Suggest reference to protection of key views, where these are evidenced within Conservation Area Appraisal.
Townscape and Landscape	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	-/?	-/?	-/?	I	P	Local; City-wide; trans-boundary	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM: Reference need to conserve and enhance ecological networks associated with the Easton-Staple Hill Disused Railway SNCI.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+/?	+/?	+/?	D	P	Local and City-wide; trans-boundary	As above.	AM: Require loss of GI to be replaced where it would enhance cohesive GI network. CR: Existing policy in relation to GI within development. MB: Include reference to: design guidance / exemplar designs in relation to GI provision; any updated strategic GI strategy; location of and responsibilities for delivery.
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	MB: Set out requirement for proportionate public transport contributions/infrastructure provision by developers in conjunction with Draft Policy IDC1. AM: Provide detail, location and delivery mechanisms for public transport, cycling and walking improvements (e.g. connections between Fishponds Road and Lodge Causeway). AM: Provide greater detail for how car use will be discouraged within the area.
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	D	P	Local; City-wide; Trans-boundary.	R: Bristol's highway network; public health; Bristol's population.	
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	0/?	0/?	0/?	Both	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Include reference to latest climate change projections for flood risk. CR: Retained Policy BCS16.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management.
	17. Minimise air and noise pollution	DMC38	-/?	-/?	-/?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	n/a

Evaluation of Effects	<p>Scale of effects: The scale of effects of this draft policy would be predominantly attributable to the Growth and Generation Area and the specific sites within this broader area. However, this draft policy would likely have effects upon adjacent land and key receptors, such as the Easton-Staple Hill Disused Railway SNCI. Through development of this Growth and Regeneration Area, there would also likely be cumulative impacts on the wider Bristol City Centre area, including for the delivery of affordable housing, and employment opportunities, the local transport network, heat network and localised energy demands, and waste management, amongst other key sustainability issues.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> This draft policy could have positive effects for housing delivery, and the quantum of ‘at least 1,500 new homes’ is specified within policy text (DMC1). In absence of JSP policies for affordable housing or in-text references to appropriate levels of affordable housing, assessment of this policy against DMC2 is uncertain. Reference should be made to the appropriate percentage target of affordable housing provision (in accordance with BCS17, DM3 or equivalent) which should be informed by a proportionate assessment of viability at the plan-level. Cross-reference could be made to proposed policies for community-led housing, and sites may be identified where there is sufficient evidence to do so (DMC4). Place principles set out by the draft policy text include the requirement for development to make efficient use of land, in line with Urban Living principles and the Local Plan Development Strategy. With proposals required to be developed in a comprehensive/co-ordinated manner, it is considered that this draft policy could provide positive, yet unknown, effects for SA Objective 2 (DMC5). Given the overwhelmingly urban and brownfield nature of the GRA, with almost no open space, it is considered that its development and regeneration could produce positive effects for both DMC5 and DMC7. Being sited within the Outer Urban Area, draft Policy UL2 requires that proposals for residential development reflect 100dph as a minimum, which could generate positive effects for DMC6. Effects of this draft policy text against Objective 2 are overall unknown, given that there is potential for both positive and negative effects related to intensification that are unlikely to be known until site-specific proposals come forward. The GRA directly overlaps with the Fishponds Town Centre, for which there is some provision of services, including Fishponds Library and Morrisons and Turners Pharmacy. The GRA is also within 800m walk of Lodge Causeway District Centre, which could directly service the southern edge of the GRA. In addition, the draft policy text requires the development of retail and leisure development consistent with DM7 to DM11, and the provision of active ground floor uses focused on the Fishponds Town Centre and principal approaches. This draft policy would deliver a significant positive effect when assessed against Objective 3 DMC8 and Objective 9. This draft policy text requires provision of community facilities to support residential development. As there is currently relatively limited formalised community provision within the GRA, the draft policy could result in a net gain of community or community service facilities. The effects against this Objective are likely to be positive, but unknown. It is considered that this draft policy has some potential to produce positive effects for SA Objective 5 (DMC10 and DMC11), as the GRA is located within an area of moderate deprivation (based upon 2019 IMD Data). Development and regeneration of this GRA therefore has the potential to transform the built environment through improved sustainable transport linkages, public realm improvements and offering opportunities for investment in local employment through the provision of workspace. Effects are also partly unknown and remain dependent upon site specific proposals. The GRA includes one area currently designated as Important Open Space, the Bristol Bath Cycle Path, which is proposed to be protected as Local Green Space within the Local Plan. This has the potential to maintain/improve positive well-being and healthy lifestyles (DMC13), especially as draft policy text intends to enhance this connectivity. However, as a proportion of the area is within an existing AQMA, future occupants/users of development could be subject to relatively poor air quality which would not be conducive to good public health; and would therefore require appropriate mitigation. There is one referral unit, at St Matthias Academy, within the GRA boundary, however there are several primary schools within 800m and a secondary school adjacent to the northern boundary of the GRA. The draft policy could therefore generate positive effects for DMC16 as it is considered that there is a high level of physical accessibility to existing surrounding educational facilities. This draft policy is considered to produce positive effects for SA Objective 8 where development is required to provide high quality workspace including a range of business uses (DMC17). The sector type of employment/business use is not specified within policy text, and therefore effects of this policy text are uncertain for DMC18; however, provision of high-quality workspaces could support: creative, cultural and digital industries; and financial, business and legal ‘tech’ services as defined within the Local Industrial Strategy. As the GRA is located in an area where a moderate-high proportion of working-age population are involuntarily unemployed, it is also considered that this draft policy could generate positive effects for DMC19. The extent to which this Policy Option would support delivery of carbon neutral employment space is uncertain, although the site itself is accessible by sustainable transport modes and this could serve to encourage a shift from unsustainable modes of travel to places of employment (DMC21). A small proportion of the GRA is located within the Stapleton and Frome Valley Conservation Area, which is adjacent to the northern boundary. There are no listed buildings within the area. As such, there remains potential for some impact of redevelopment or new development on designated heritage assets, particularly the Conservation Area in the north. Effects are also partly unknown and remain dependent upon site specific proposals. As the site includes a proportion of land designated as an SNCI, there is the potential for impacts of development in the absence of appropriate and proportionate ecological mitigation (DMC25). Whilst the GRA does not contain any statutory designated wildlife sites, it is within an SSSI Impact Zone which predominantly requires consultation with statutory bodies for some industrial development. The delivery, scale and location of any net gain in biodiversity is subject to future development proposals and therefore remains uncertain (DMC26). As the draft policy references the requirement for development to include GI and public realm improvements, it is considered that this draft policy could therefore generate positive effects for SA Objective 12 (DMC27); however, effects are partly uncertain as the nature of such improvements, and their integration with the existing GI network, remains contingent upon detailed design. The Growth and Regeneration Area is relatively well served by strategic infrastructure, including a number of bus routes along the A432 Fishponds Road, and access to the Bath and Bristol Cycle path. There are no bus stops along Lodge Causeway, however, which passes through the GRA. To encourage a mode shift and reduce the need to travel, the draft policy text requires development to provide a range of workspaces and business uses alongside residential uses, new walking and cycling routes to connect to neighbourhoods and the wider cycle network, public transport improvements defined within the policy text and green infrastructure improvements. The Growth and Regeneration Area could have a positive effect on the ability to improve access to and quality of sustainable transport modes (DMC28), however improving accessibility to public transport along Lodge Causeway may support greater use of more sustainable transport measures (DMC29). Flood risk within the GRA is considered to be low, being predominantly located within Flood Risk Zone 1. While the exact location of new development within the GRA boundary is unknown, it is considered that the potential for effects of development/regeneration for local flood risk is therefore relatively low when appraised against SA Objective 15. The use of SUDS as set out by retained flood risk Policy BCS16 could provide appropriate mitigation for any adverse surface water flood risk at the site. While the GRA is not adjacent to any groundwater protection zones it is located within a ward that contains two vulnerable water bodies (those that are currently classified by the Environment Agency as ‘Poor’ or ‘Bad’ in status^{8,9}), being the Fishponds Brook and Coombe Brook, effects against DMC34 are therefore unknown. Moreover, the extent to which this draft policy would deliver a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production is unknown (DMC35, DMC36); this remains dependent upon the nature of detailed design proposals and compliance with other draft Local Plan policies in relation to climate change and sustainability. As set out above, the GRA is located within an existing AQMA and as such it is considered that this may cause undue exposure of new development and its future occupants to high levels of existing pollutants (DMC38); however, the effects of development are also partly unknown, and remain dependent upon the nature of development (use), alongside the availability and usage of sustainable and/or active travel modes for new development/regeneration to limit the impact of vehicular emissions, alongside any proposed mitigation delivered under Draft Policy HW2.
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⁸ List of Vulnerable Water Bodies- Avon Bristol Urban catchment: <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3046/classification?item=106&status=Poor&status=Fail&status=Bad>

⁹ Pinpoint data – river water quality 2013. <https://maps.bristol.gov.uk/pinpoint/>

Draft Policy DS8 Central Bedminster Area of Growth and Regeneration

The Central Bedminster Area of Growth and Regeneration (GRA) is located within South Bristol. Alongside Brislington Growth and Regeneration Area, Knowle West Regeneration Area (defined within the adopted plan), Hengrove and Whitchurch Park Neighbourhood Plan, and through changes to the Green Belt, South Bristol is expected to accommodate around 11,000 new homes.

Key baseline and sustainability issues associated with the GRA are defined as follows:

- The GRA is located within an area of high deprivation and is an area that has a high proportion of working-age population who are involuntarily unemployed;
- The vast majority of the GRA is located within an AQMA and approximately 6% of the GRA is also within a Cumulative Impact Zone (Bedminster Cannon Street). Therefore concentrations of NO₂ and particulate matter (PM₁₀) exceed or potentially exceed national targets;
- The GRA is overwhelmingly brownfield in nature. Two Important Open Spaces, Dalby Avenue and St. John's Churchyard (proposed to be designated as Reserved Open Space within the Local Plan) are within the GRA boundary, whilst the 'Railway Sidings, Bedminster' along the southern boundary is also proposed to be retained as Reserved Open Space;
- The GRA is bounded and overlapped slightly by two wildlife corridors at the south (Railway between A38 road crossing and Bath Rd; and Victoria Park);
- A small area of Windmill City Farm allotments is located within the GRA boundary, between Philip Street and Whitehouse Lane;
- Almost half of the GRA falls within the Bedminster Conservation Area, which is particularly focussed around Bedminster Parade and includes multiple listed buildings fronting this road, York Road, Devonshire Buildings and Boot Lane;
- The majority of land within the GRA is currently designated as Principal Industrial and Warehousing Area, however this include sites which are considered to be vacant or underused;
- Flood risk within the GRA is moderate to high, with areas adjacent to the Malago River (designated as a 'Main River' by the Environment Agency) located within Flood Risk Zones 2, 3a and 3b (approximately 46%, 7% and 1% respectively);
- The GRA is adjacent to the River Malago, which is classified by the Environment Agency as 'moderate' water body status, accounting for both ecological and chemical pollutants. According to EA assessment, the water body failed on the 'priority hazardous substances' classification, with traces of mercury and phosphate identified¹⁰; and
- The GRA is within a Heat Connection Zone, which therefore offers opportunities for the use of low carbon energy networks/decentralised energy sources within new development.

Draft Policy DS8 (the 'March 2019 Consultation Option') sets out principles related to the regeneration and development of the Bedminster GRA; it includes the following requirements:

- Residential development of a minimum capacity of 2,500 with a mix of types, sizes and tenures at densities and forms appropriate to achieving this figure;
- Provision of high-quality workspace, providing for a range of business uses, as part of the development mix in the area;

¹⁰ <https://environment.data.gov.uk/catchment-planning/WaterBody/GB109053021970>

- Up to 1,000 student bedspaces in addition to the new homes proposed, in alignment with Draft Policy H7;
- Retail and leisure development consistent with Retained Policies DM7 to DM11;
- Provision of community facilities required to support the residential and student development;
- Public transport improvements, including Malago Road and improved facilities at Bedminster Railway Station;
- New and improved walking and cycling routes to connect to the development to the surrounding neighbourhoods, public transport facilities and the wider cycle network; and
- Green infrastructure and public realm enhancements including improvements to public open spaces within the area.

In addition, development will be expected to:

- Make efficient use of land; and demonstrate that opportunities have been sought to progress more comprehensive or co-ordinated forms of development with other sites in the locality;
- Be of a scale and design appropriate to Central Bedminster's town centre location, taking account of the Bedminster conservation area. As part of this, tall buildings in the right setting and of the right design may be appropriate as part of the overall approach to development (Draft Policy DC2 'Tall buildings');
- Include strengthened pedestrian and cycle links between Bedminster Town Centre and the surrounding area, particularly between Windmill Hill, East Street and St. Catherine's Place and from Spring Street to St. Luke's Road,
- Enhancement of the River Malago as a townscape feature, pedestrian route and green infrastructure corridor providing benefits for wildlife and sustainable drainage, including de-culverting at Whitehouse Lane, where feasible;
- Be supported by transport improvements which will include public transport enhancements, enhanced connectivity with surrounding areas, cycle provision, pedestrian route improvements and local highway improvements;
- Provide for an appropriate form and amount of new workspace as part of the mix of uses in the area, where sites currently or recently used for business purposes are proposed to be redeveloped for other uses;
- Contribute to an appropriate mix of housing types;
- Where development of sites is proposed that are subject to flood risk now or with climate change projections should be supported by a flood risk sequential test undertaken within the policy area, taking account of all reasonably available sites in the area; and,
- Be supported by a Flood Risk Assessment where development is proposed on sites at risk of flooding or are larger than 1ha in area.

The policy sets out that where sites are developed, a density of 120dph will be sought as a minimum, but higher densities of 200dph or more may be appropriate, subject to a co-ordinated approach to development which delivers quality urban design.

Draft Policy DS8: Central Bedminster

SEA Theme	SA Framework Objective	D-M Criteria	Assessment of Sustainability Effects						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (O/+/- / ?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	++/?	++/?	++/?	D	p	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design. CR: Explicitly state requirement for affordable housing as a percentage, which should be informed by an assessment of viability at the plan-level. CR: Self-build and/or community led housing draft policies and consider sites for the delivery where appropriate evidence exists.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	++/?	++/?	++/?	D	p	Local	As above, plus: R: Brownfield sites and previously developed sites; AG: Local businesses.	CR: Reference should be made to the Bedminster Green Framework to encourage integrated, high-quality design and a coordinated approach to development.
	3. Ensure easy and affordable access to key services	DMC8	++/?	++/?	++/?	D	Both	Local	R: Bristol's local economy; Bristol's population; AG: Local businesses and users.	MB: Provide additional detail on the definition of needed complementary retail and leisure uses within the wider GRA.
	4. Increase participation in cultural and community activities	DMC9	+/?	+/?	+/?	I	Both	Local	AG: Bristol's population.	MB: In addition to 'provision of community facilities', include support for enhancement of existing establishments.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	++/?	++/?	++/?	I	Both	Local; City-wide.	R: Built environment. AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	-/?	-/?	-/?	Both	Both	Local and City-wide	R: Public health. AG: Bristol's population.	CR: Include reference to retained and draft transport DM policies. AM: Reference to Draft Policy HW2 in relation to mitigation of development proposals within AQMA. MB: Include detail of specific pedestrian and cycling connections (i.e. detailed location, responsibility for delivery, cost, phasing).
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	+/?	+/?	+/?	Both	Both	Local	R: Bristol's population. AG: All groups.	MB: Ensure physical access to, and catchment access to, existing educational establishments in neighbourhoods adjacent to the GRA to increase participation in education and skills development.
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	AM: Ensure the delivery of a range of business uses by explicitly setting out the floorspace ratio for each B use class on a site basis, or setting out sector-specific types. MB: Support delivery of flexible and/or co-working employment space and include reference to delivery of efficient zero carbon forms of workspace/office space. CR: Reference to transport policies that support delivery of sustainable transport infrastructure for office development. AM: Require proposals for any redevelopment of business use sites to ensure defined quantum of workspace within mixed use development uses, to safeguard a range and balance of workspace.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Bristol's local economy; Bristol's population AG: Local businesses	MB: Ensure that retail service provision follows the retail hierarchy for the area.
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	-/?	-/?	-/?	I	P	Local and City-wide	R: Cultural heritage; built environment; AG: Bristol's population.	CR: Include reference to existing and draft design and conservation policies. MB: Ensure that the scale of development does not cumulatively result in significant harm to the Conservation Area or Grade II listed buildings. AM: Provide additional detail within the policy to ensure that development prevents harm to designated heritage assets (including the setting of the Conservation Areas, and key views within this).
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	-/?	-/?	-/?	I	P	Local; City-wide; Trans-boundary.	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM: Reference need to conserve and enhance ecological networks associated with the River Malago and adjacent wildlife network corridors. MB: By opening up the River Malago, this could make space for water, improve amenity and increase biodiversity 'net gain'.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+/?	+/?	+/?	D	P	Local; City-wide; Trans-boundary.	As above.	AM: Require loss of GI to be replaced where it would enhance cohesive GI network. CR: Existing policy in relation to GI within development. MB: Include reference to: design guidance / exemplar designs in relation to GI provision; any updated strategic GI strategy; location of and responsibilities for delivery (e.g. for daylighting the Malago).
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	MB: Set out requirement for proportionate public transport contributions/infrastructure provision by developers in conjunction with Draft Policy IDC1. AM: Set out locations for new walking and cycling routes and responsibilities for delivery.
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	D	P	Local and City-wide.	R: Bristol's highway network; public health; Bristol's population.	AM: Set out the detail associated with public transport improvements along Malago Road and at Bedminster Railway Station.
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	-/?	-/?	-/?	Both	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	AM: Make reference to the Bristol Flood Strategy and implications of this on the River Malago; and require appropriate reference to climate change allowances within flood risk assessments. Set out the implications / benefits of daylighting the Malago on flood risk and GI. CR: Retained Policy BCS16.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management. AM: Make reference to urban food growing as part of GI provision, noting where this could be integrated with the existing Windmill City Farm.
	17. Minimise air and noise pollution	DMC38	-/?	-/?	-/?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2.
	18. To maximise the potential for energy efficiency, reduce greenhouse	DMC39	+/?	+/?	+/?	D	Both	Local; City-wide;	R: Natural environment (water); AG:	MB: Suggest reference is made to the Heat Connection Zone, with an associated requirement for any

	gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC40 DMC41 DMC42						Trans-boundary.	Bristol's population; local wildlife.	future development proposals.
Evaluation of Effects	<p>Scale of effects: The scale of effects of this draft policy would be predominantly attributable to the Growth and Regeneration Area and the specific sites within this broader area. However, this draft policy would likely have effects upon adjacent land and key receptors, such as the River Malago which is surrounded by areas of Flood Risk. Almost half of the GRA falls within the Bedminster Conservation Area, which is particularly focussed around Bedminster Parade and includes multiple Grade II listed buildings fronting this road, York Road, Devonshire Buildings and Boot Lane. As such, there does remain potential for impact of redevelopment or new development on the setting of these designated heritage assets (DMC24) particularly given the proportion of the area that overlaps with the Conservation Area. The GRA is located within an existing AQMA and as such it is considered that this may cause undue exposure of new development and its future occupants to high levels of existing pollutants (DMC38). Through development of this Growth and Regeneration Area, there would also likely be cumulative impacts on the wider Bristol City Centre area, including for the delivery of affordable housing, and employment opportunities, the local transport network, heat network and localised energy demands, and waste management, amongst other key sustainability issues.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> This draft policy could have positive effects for housing delivery, and the quantum of 'at least 2,500 new homes' is specified within policy text (DMC1). In absence of JSP policies for affordable housing or in-text references to appropriate levels of affordable housing, assessment of this policy against DMC2 is uncertain. Reference should be made to the appropriate percentage target of affordable housing provision (in accordance with BCS17, DM3 or equivalent) which should be informed by a proportionate assessment of viability at the plan-level. The draft policy text references delivery of purpose-built student accommodation and could therefore produce positive effects for DMC3. Cross-reference could be made to proposed policies for community-led housing, and sites may be identified where there is sufficient evidence to do so (DMC4). Place principles set out by the draft policy text include the requirement for development to make efficient use of land, in line with Urban Living principles and the Local Plan Development Strategy. With proposals required to be developed in a comprehensive/co-ordinated manner, it is considered that this draft policy could provide positive, yet unknown, effects for SA Objective 2 (DMC5). The GRA is overwhelmingly urban, with limited areas of Important Open Space that are proposed for protection as Reserved Open Spaces. As the area is in the Inner Urban Area, draft Policy UL2 requires that proposals for residential development reflect 120dph whilst supporting text also allows for developments of 200dph; this could generate positive effects for DMC6. Effects of this draft policy text against Objective 2 are therefore significantly positive, however overall unknown as that there is potential for both positive and negative effects related to intensification that are unlikely to be known until site-specific proposals come forward. There is a high provision of services within the boundary of the GRA itself, including three formal Community Centres (The Green House, Windmill Hill City Farm, Bedminster Library Meeting Room), Libraries (Bedminster Library), Post Offices (Cannon Street Post Office) and Pharmacy (Granby Clinic). Almost a quarter of the GRA is formed by the Bedminster Town Centre, whilst North Street, Southville District Centre and Totterdown Local Centre all exist within 800m (Objective 3 DMC8 and Objective 9). In addition, draft policy text requires the development of retail and leisure development consistent with DM7 to DM11. The assessment of this draft policy against these requirements is therefore likely to be significant positive, but uncertain. The GRA contains a number of community facilities, including The Green House, Windmill Hill City Farm and Bedminster Library Meeting Room. This draft policy text requires provision of community facilities to support residential and student development. Therefore, the effects against this Objective are likely to be positive, but unknown until site-specific proposals are made. It is considered that this draft policy has the potential to produce positive effects for SA Objective 5 (DMC10 and DMC11), as the GRA is located within an area of high deprivation (based upon 2019 IMD Data). Development and regeneration of this GRA therefore has the potential to transform the built environment through improved sustainable transport linkages, public realm improvements and offering opportunities for investment in local employment through the provision of workspace. Effects are also partly unknown and remain dependent upon site specific proposals. Whilst the GRA contains limited areas of Important Open Space, which are proposed to be designated as Reserved Open Space, the area is adjacent to an extensive area of green space, Victoria Park. The combination of these areas and draft requirements for development to include green infrastructure and public realm enhancements could help maintain/improve positive well-being and healthy lifestyles (DMC13). As a significant proportion of the area is within an existing AQMA, future occupants/users of development could be subject to relatively poor air quality, which would therefore require appropriate mitigation. Given the current industrial and warehousing, alongside retail, nature of the area, there are no educational facilities within the GRA boundary. However, the area is within walking distance of a number of primary schools and secondary schools (although Ashton Park School is beyond the 1500m preferred distance). Overall, however, the draft policy could therefore generate positive effects for DMC16 as it is considered that there is a high level of physical accessibility to existing surrounding educational facilities. This draft policy is considered to produce positive effects for SA Objective 8 where development is required to provide high quality workspace including a range of business uses (DMC17). The sector type of employment/business use is not specified within policy text, and therefore effects of this policy text are uncertain for DMC18; however, provision of high-quality workspaces could support: creative, cultural and digital industries; and financial, business and legal 'tech' services as defined within the Local Industrial Strategy. As the GRA is located in an area where a moderate-high proportion of working-age population are involuntarily unemployed, it is also considered that this draft policy could generate positive effects for DMC19. The extent to which this Policy Option would support delivery of carbon neutral employment space is uncertain, although the site itself is accessible by sustainable transport modes and this could serve to encourage a shift from unsustainable modes of travel to places of employment (DMC21). Almost half of the GRA falls within the Bedminster Conservation Area, which is particularly focussed around Bedminster Parade and includes multiple Grade II listed buildings fronting this road, York Road, Devonshire Buildings and Boot Lane. As such, there does remain potential for impact of redevelopment or new development on the setting of these designated heritage assets (DMC24), particularly in locations where tall buildings are proposed. Effects are also partly unknown and remain dependent upon site specific proposals. While the GRA does not overlap with any statutory wildlife designation, a wildlife corridor and the River Malago is located along the southern boundary of the GRA; as such, there is the potential for impacts of development on these areas in the absence of appropriate and proportionate ecological mitigation (DMC25). Whilst the GRA does not contain any statutory designated wildlife sites, it is within an SSSI Impact Zone which predominantly requires consultation with statutory bodies for different types of industrial development. The delivery, scale and location of any net gain in biodiversity is subject to future development proposals and therefore remains uncertain (DMC26). As the draft policy references the requirement for development to include GI and public realm improvements, it is considered that this draft policy could therefore generate positive effects for SA Objective 12 (DMC27); however, effects are partly uncertain as the nature of such improvements, and their integration with the existing GI network, remains contingent upon detailed design. The Growth and Regeneration Area is generally well served by strategic infrastructure, including Bedminster Railway Station to the south, bus stops along the A38 Dalby Avenue and Bedminster Parade, and strategic cycle routes along Whitehouse Street. To encourage a modal shift and reduce the need to travel, the draft policy text requires development to provide a range of workspaces and business uses alongside residential uses, new walking and cycling routes to connect to neighbourhoods and the wider cycle network, public transport improvements defined within the policy text and green infrastructure improvements. The Growth and Regeneration Area could have a positive effect on the ability to improve access to and quality of sustainable transport modes (DMC28). Flood risk within the GRA is moderate to high, with areas adjacent to the Malago River (designated as a Main River by the Environment Agency) located within Flood Risk Zones 2 and 3 (46% and 7%, respectively). While the exact location of new development within the GRA boundary is unknown, the potential for negative effects of development to be impacted by flood risk or create risks elsewhere is considered to be high when appraised against SA Objective 15. The requirement for a Flood Risk Assessment or Sequential Test (as appropriate) could serve to mitigate flood risk issues and ensure that development accounts for future climate change scenarios. The use of SUDS as set out by retained flood risk Policy BCS16 could provide appropriate mitigation for any adverse surface water flood risk at the site. Whilst is not adjacent to any groundwater protection zones, it is adjacent to the River Malago, which is classified by the Environment Agency catchment data as 'moderate' in water body status. Effects against DMC34 are therefore uncertain. Moreover, the extent to which this draft policy would deliver a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production is unknown (DMC35, DMC36); this remains dependent upon the nature of detailed design proposals and compliance with other draft Local Plan policies in relation to climate change and sustainability. The effect on urban food production (DMC37) is unclear, with draft policy text needing to provide clarity on whether the allotments are to be retained. As set out above, the GRA is located within an existing AQMA and as such it is considered that this may cause undue exposure of new development and its future occupants to high levels of existing pollutants (DMC38). However, the effects of development are also partly unknown, and remain dependent upon the land use type, alongside the availability and usage of sustainable and active travel modes for new development, alongside any proposed mitigation delivered under Draft Policy HW2. The GRA is within a Heat Connection Zone, which could present opportunities for the use of low carbon and decentralised energy sources (DMC40). 									

Draft Policy DS9 Brislington Area of Growth and Regeneration

The Brislington Area of Growth and Regeneration (GRA) is located within South Bristol. Alongside Central Bedminster Growth and Regeneration Area, Knowle West Regeneration Area (defined within the adopted plan), Hengrove and Whitchurch Park Neighbourhood Plan, and through changes to the Green Belt, South Bristol is expected to accommodate around 11,000 new homes.

Key baseline and sustainability issues associated with the GRA are defined as follows:

- The GRA is located within an area of high deprivation and is an area that has a high proportion of working-age population who are involuntarily unemployed;
- Approximately half of the GRA is located within an AQMA, and therefore concentrations of NO₂ and particulate matter (PM₁₀) exceed or potentially exceed national targets;
- The GRA is overwhelmingly brownfield in nature, although a very small proportion of the area (less than 1%) overlaps with Land adjacent to Brislington Brook, Land adjacent to Brislington Meadows and Land adjacent to Brislington Motor Services. These spaces are currently designated as Important Open Spaces within the adopted plan;
- A very small percentage of the GRA is located within the Brislington Conservation Area around Church Hill and Glenarm Road. There are a number of listed assets within the GRA, including the Grade II Listed 47 and 49 Brislington Hill, White Hart Hotel and Bristol War Room;
- A small percentage of the GRA (approximately 1%) is located within SSSI (Brislington Meadows);
- A large proportion of the GRA is currently designated as Principal Industrial and Warehousing Land, however this includes sites which are considered to be vacant or underused;
- Flood risk within the GRA is relatively low, although a small proportion of the GRA adjacent to Brislington Brook is located within Flood Risk Zones 2 (approximately 5% of the total area); and
- The GRA does not overlap with a Heat Connection Zone.

Draft Policy DS9 (the 'March 2019 Consultation Option') sets out principles related to the regeneration and development of the Brislington GRA; it includes the following requirements:

- Residential development of a minimum capacity of 350 homes through a combination of existing allocated sites and new development opportunities, at densities and forms appropriate to achieving this figure;
- Provision of high-quality workspace, providing for a range of business uses, as part of the development mix in the area;
- Retail and leisure development consistent with Retained Policies DM7 to DM11;
- New and improved walking and cycling routes to connect to the development to the surrounding neighbourhoods, public transport facilities and the wider cycle network; and
- Green infrastructure and public realm enhancements.

In addition, development will be expected to:

- Make efficient use of land; and demonstrate that opportunities have been sought to progress more comprehensive or co-ordinated forms of development with other sites in the locality;
- Include strengthened pedestrian and cycle links to the surrounding area, particularly to Brislington Local Centre, local schools and the proposed new community at Bath Road (Draft Policy DS12 'New neighbourhood – Bath Road, Brislington');

- Include stronger and more coherent built frontages to Bath Road, with associated improvements to the public realm;
- Be supported by transport improvements which will include public transport enhancements, enhanced connectivity with surrounding areas, cycle provision, pedestrian route improvements and local highway improvements;
- Provide for an appropriate form and amount of new workspace as part of the mix of uses in the area, where sites currently or recently used for business purposes are proposed to be redeveloped for other uses; and
- Contribute to an appropriate mix of housing types.

The policy sets out that where sites are developed, a density of 60dph will be sought as a minimum, but higher densities of 100dph or more may be appropriate, subject to a co-ordinated approach to development which delivers quality urban design.

Draft Policy DS9: Brislington

SEA Theme	SA Framework Objective	D-M Criteria	Assessment of Sustainability Effects						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	++/?	++/?	++/?	D	p	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design. CR: Explicitly state requirement for affordable housing as a percentage, which should be informed by an assessment of viability at the plan-level. CR: Self-build and/or community led housing draft policies and consider sites for the delivery where appropriate evidence exists.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	++/?	++/?	++/?	D	p	Local	As above, plus: R: Brownfield sites and previously developed sites; AG: Local businesses.	MB: Establish masterplan for Brislington GRA, to ensure that development creates a comprehensive or coordinated approach consistent with delivering high quality place-making. MB: Include exemplar examples of 'coherent built frontages' for Bath Road.
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	D	Both	Local	R: Bristol's local economy; Bristol's population AG: Local businesses	MB: Provide additional detail on the definition of needed complementary retail and leisure uses within the wider GRA.
	4. Increase participation in cultural and community activities	DMC9	?	?	?	I	Both	Local	AG: Bristol's population.	MB: Include reference to 'provision of community facilities' and support for enhancement of existing establishments.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	++/?	++/?	++/?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	-/?	-/?	-/?	Both	Both	Local and City-wide	R: Public health. AG: Bristol's population.	CR: Include reference to retained and draft transport DM policies. AM: Reference to Draft Policy HW2 in relation to mitigation of development proposals within AQMAS. MB: Include detail of specific pedestrian and cycling connections (i.e. detailed location, responsibility for delivery, cost, phasing).
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	+/?	+/?	+/?	Both	Both	Local and City-wide	R: Bristol's population AG: All groups	MB: Ensure physical access to, and catchment access to, educational establishments outside the GRA, to increase participation rates in education and skills development.
	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	AM: Ensure the delivery of a range of business uses by explicitly setting out the floorspace ratio for each B use class on a site basis, or setting out sector-specific types. MB: Support delivery of flexible and/or co-working employment space and include reference to delivery of efficient zero carbon forms of workspace/office space. AM: Require proposals for any redevelopment of business use sites to ensure defined quantum of workspace within mixed use development uses, to safeguard a range and balance of workspace.
Economy and Employment	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Bristol's local economy; Bristol's population; AG: Local businesses.	MB: Ensure that retail service provision follows the retail hierarchy for the area.
	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local	R: Cultural heritage; built environment; AG: Bristol's population.	CR: Include reference to existing and draft design and conservation policies. AM: Take account of designated heritage assets (including the Brislington Conservation Area and Grade II Listed Buildings).
Townscape and Landscape	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	-/?	-/?	-/?	I	P	Local	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM: Reference need to conserve and enhance ecological networks associated with the Brislington Meadows SNCI.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+/?	+/?	+/?	D	P	Local; City-wide; trans-boundary	As above.	AM: Require loss of GI to be replaced where it would enhance cohesive GI network. CR: Existing policy in relation to GI within development. MB: Include reference to: design guidance / exemplar designs in relation to GI provision; any updated strategic GI strategy; location of and responsibilities for delivery.
Transport and Movement	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	MB: Set out requirement for proportionate public transport contributions/infrastructure provision by developers in conjunction with Draft Policy IDC1. AM: Set out the proposed location and responsibilities for delivery of pedestrian and cycle links between Brislington Local Centre and Bath Road, Brislington.
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	D	P	Local; City-wide; trans-boundary	R: Bristol's highway network; public health; Bristol's population.	AM: Set out the implications of the transformational major schemes within the JLTP4 on the Bath Road, and what this means for the Growth and Regeneration Area.
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	Both	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Include reference to latest climate change projections for flood risk. AM: Require sequential test to ensure development is located outside of the current and future floodplain of the Brislington Brook. MB: Consider opportunities for maximising green infrastructure associated with Brislington Brook. CR: Retained Policy BCS16.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local; City-wide	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management.
	17. Minimise air and noise pollution	DMC38	-/?	-/?	-/?	I	Both	Local; City-wide; trans-boundary	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	n/a

Evaluation of Effects	<p>Scale of effects: The scale of effects of this draft policy would be predominantly attributable to the Growth and Generation Area and the specific sites within this broader area. However, this draft policy would likely have effects upon adjacent land and key receptors, such as Brislington Meadows SNCI. Although land adjacent to Brislington Brook is located within Flood Risk Zones 2 and 3 (5% and 3%, respectively), flood risk within the wider GRA is considered to be low overall. As set out above, the GRA is located within an existing AQMA and as such it is considered that this may cause undue exposure of new development and its future occupants to high levels of existing pollutants (DMC38). Through development of this Growth and Regeneration Area, there would also likely be cumulative impacts on the wider Bristol City Centre area, including for the delivery of affordable housing, and employment opportunities, the local transport network, heat network and localised energy demands, and waste management, amongst other key sustainability issues.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> This draft policy could have positive effects for housing delivery, and the quantum of ‘at least 350 new homes’ is specified within policy text (DMC1). In absence of JSP policies for affordable housing or in-text references to appropriate levels of affordable housing, assessment of this policy against DMC2 is uncertain. Reference should be made to the appropriate percentage target of affordable housing provision (in accordance with BCS17, DM3 or equivalent) which should be informed by a proportionate assessment of viability at the plan-level. The draft policy text references the need for an appropriate mix of housing types and it could therefore produce positive effects for DMC3. Cross-reference could be made to proposed policies for community-led housing, and sites may be identified where there is sufficient evidence to do so (DMC4). Place principles set out by the draft policy text include the requirement for development to make efficient use of land, in line with Urban Living principles and the Local Plan Development Strategy. With proposals required to be developed in a comprehensive/co-ordinated manner, it is considered that this draft policy could provide positive, yet unknown, effects for SA Objective 2 (DMC5). The GRA is overwhelmingly urban, with very limited areas of Important Open Space that are proposed for protection as Reserved Open Spaces. Being sited within the Outer Urban Area, draft Policy UL2 requires that proposals for residential development reflect 60dph as a minimum, which could generate positive effects for DMC6. Effects of this draft policy text against Objective 2 are overall unknown, given that there is potential for both positive and negative effects related to intensification that are unlikely to be known until site-specific proposals come forward. There is limited provision of services within the boundary of the GRA itself, only the Hungerford Road Community Centre Social Club. The GRA does however overlap with the Brislington Local Centre (Objective 3 DMC8 and Objective 9) however there is limited other provision within an 800m walking distance. The draft policy text does however require the development of retail and leisure development consistent with DM7 to DM11, and therefore the assessment of this draft policy against these requirements could be positive, but uncertain. This draft policy is considered to produce unknown effects for DMC9. Whilst there is existing provision within the GRA, the draft policy text itself does not include the requirement for the development of new community facilities. A net gain of community or community service facilities would be unknown until site-specific proposals are made. It is considered that this draft policy has the potential to produce positive effects for SA Objective 5 (DMC10 and DMC11), as the GRA is located within an area of high deprivation (based upon 2019 IMD Data). Development and regeneration of this GRA therefore has the potential to transform the built environment through improved sustainable transport linkages, public realm improvements and offering opportunities for investment in local employment through the provision of workspace. Effects are also partly unknown and remain dependent upon site specific proposals. A very small proportion of the area (less than 1%) overlaps with Land adjacent to Brislington Brook, Land adjacent to Brislington Meadows and Land adjacent to Brislington Motor Services. These spaces are currently designated as Important Open Spaces within the adopted plan, and are largely proposed to be retained as Reserved Open Space. These spaces do have the potential to maintain/improve positive well-being and healthy lifestyles (DMC13). As half of the area falls within an AQMA, future occupants/users of development within the GRA could be subject to relatively poor air quality, which would therefore require appropriate mitigation. There is no educational provision within the GRA itself. However, there is primary, secondary school and sixth form college within 500m of the boundary; and as such, this draft policy is considered to generate positive effects for DMC16 as it is considered that there is a high level of physical accessibility to this facility. In addition, the draft policy text seeks to strengthen pedestrian and cycle links through the area, including to the local schools and the proposed new community at Bath Road, which could also help ensure that educational services are located within easy walking distance. This draft policy is considered to produce positive effects for SA Objective 8 where development is required to provide high quality workspace including a range of business uses (DMC17). The sector type of employment/business use is not specified within policy text, and therefore effects of this policy text are uncertain for DMC18; however, provision of high-quality workspaces could support: creative, cultural and digital industries; and financial, business and legal ‘tech’ services as defined within the Local Industrial Strategy. As the GRA is located in an area where a high proportion of working-age population are involuntarily unemployed, it is also considered that this draft policy could generate positive effects for DMC19. The extent to which this Policy Option would support delivery of carbon neutral employment space is uncertain, although the site itself is accessible by sustainable transport modes and this could serve to encourage a shift from unsustainable modes of travel to places of employment (DMC21). A very small percentage of the GRA is located within the Brislington Conservation Area around Church Hill and Glenarm Road. There are a number of dispersed Grade II listed buildings within the area too. As such, there remains potential for impact of development on the historic environment (DMC24), including the setting of the listed assets and the wider Conservation Area. Effects are also partly unknown and remain dependent upon site specific proposals. A small percentage of the GRA (1%) is located within SNCI (Brislington Meadows) and an SSSI Impact Zone, and therefore there is the potential for negative effects for SA Objective 11 in the absence of appropriate and proportionate ecological mitigation (DMC25). The delivery, scale and location of any net gain in biodiversity is subject to future development proposals and therefore remains uncertain (DMC26). As the draft policy references the requirement for development to include GI and public realm improvements, it is considered that this draft policy could therefore generate positive effects for SA Objective 12 (DMC27). However, effects are partly uncertain as the nature of such improvements, and their integration with the existing GI network, remains contingent upon detailed design. The GRA displays low-moderate levels of accessibility. Whilst Bath Road is a strategic corridor into the City, walking routes and cycling routes in Brislington are relatively poor, and vehicular accessibility between Bristol and Bath is also considered to be poor. There are a number of public transport services available along Bath Road, including the 96, 178, 349, 435, 668, A4 and X39. The draft policy text does however propose public transport enhancements, enhanced connectivity with surrounding areas, cycle provision, pedestrian improvements and local highway improvements which could have positive effects for Objective 13 and 14. Within the Joint Local Transport Plan, transformational major schemes are set out for the A4 Bath Road between Bristol and Bath – future iterations of the draft policy should set out the implications of these schemes. Although land adjacent to Brislington Brook is located within Flood Risk Zones 2 and 3 (5% and 3%, respectively), flood risk within the wider GRA is considered to be low overall. While the exact location of new development within the GRA boundary is unknown, it is considered that the potential for effects of development/regeneration for local flood risk is therefore relatively low when appraised against SA Objective 15. Consider requirement for Sequential Test (as appropriate) to ensure that development is not located within the rapid response catchment of Brislington Brook; and ensure that development accounts for future climate change scenarios. The use of SUDS as set out by retained flood risk Policy BCS16 could provide appropriate mitigation for any adverse surface water flood risk at the site. While the GRA is not adjacent to any groundwater protection zones, the GRA could be affected by/could contribute to the water quality of the Brislington Brook source to River Avon, which is classified as ‘Poor’ water quality status by the Environment Agency¹¹, effects against DMC34 are therefore unknown. Moreover, the extent to which this draft policy would deliver a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production is unknown (DMC35, DMC36); this remains dependent upon the nature of detailed design proposals and compliance with other draft Local Plan policies in relation to climate change and sustainability. As set out above, the GRA is located within an existing AQMA and as such it is considered that this may cause undue exposure of new development and its future occupants to high levels of existing pollutants (DMC38); however, the effects of development are also partly unknown, and remain dependent upon the type of development, alongside the availability and usage of sustainable and/or active travel modes for new development/regeneration to limit the impact of vehicular emissions, alongside any proposed mitigation delivered under Draft Policy HW2.
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¹¹ ID: GB109053021980. <https://environment.data.gov.uk/catchment-planning/WaterBody/GB109053021980>

Draft Policy DS10 Changes to the Green Belt in South Bristol

Draft Policy DS10 proposed to retain the Green Belt within areas of Bristol, with boundaries revised in four locations to reflect exceptional circumstances.

In March 2019, the Joint Spatial Plan indicated the broad of the Green Belt in the West of England. This was informed by a Green Belt Review prepared in support of the JSP in November 2015¹². Whilst it noted the very limited level of Green Belt within the Bristol boundary, the Review identified that:

- In the south east of the City, Green Belt was considered to make a major contribution or contribution to four of the five purposes of the Green Belt, excluding the ability to preserve the setting and special character of historic towns.
- In the south west of the City, the same overall assessment was recorded; however, in the Stage 2 assessment¹³, the land was considered to only make a limited contribution or contribution to four of the five purposes.

In the south east of the City, the current Local Plan sets out that the land in the Green Belt acts as a contingency for meeting future housing needs. A Strategic Development Location at Bath Road, Brislington was included within the publication draft of the JSP for a total of 750 units. To ensure conformity with the strategic policy direction that existed at March 2019, Draft Policy DS12 New Neighbourhood at Bath Road was proposed. The detail associated with this policy was therefore directed by the JSP and is therefore not assessed here, however the principle of development at this location is assessed under Policy DS12.

In the south west of the City, three sites were identified for removal from the Green Belt which constitute 'non-strategic growth' on land inside the South Bristol Link road. These sites, which include land at Ashton Gate, land at Yew Tree Farm and land adjacent to Elsbert Drive, amount to around 850 homes. The Draft Policy sets out that detailed considerations for these sites will be included in the future iteration of the Local Plan; as such, the Interim Sustainability Appraisal considers only the key sustainability issues and the likely effects of broad principles of residential development on the SA Objectives under Policy DS11. Detailed site considerations, which are also subject to strategic considerations such as the approach to development within the South Bristol Link, will therefore be the subject of future Sustainability Appraisals.

The principle of Green Belt release and protection, and the reasonable alternatives associated with this, have been assessed within Section 5 of the Interim SA Report.

¹² JSP Green Belt Assessment Stage 1 (November 2015)

¹³ JSP Green Belt Assessment Stage 2 (November 2016)

Draft Policy DS11 Development allocations – southwest Bristol

In the context of changes proposed to the Green Belt, as set out in Draft Policy DS10 above, Draft Policy DS11 introduces new development allocations proposed for housing in the Green Belt located in southwest Bristol; these sites are specified as follows:

- Land at Ashton Gate – with capacity for 500 homes, where land will be safeguarded for the potential diversion of Ashton Vale Road to improve access to the Industry and Distribution Area;
- Land at Yew Tree Farm, Bridgwater Road – with capacity for 200 homes; and
- Land adjacent to Elsbert Drive, Bishopsworth – with capacity for 150 homes.

Draft Policy DS11 stipulates that on each site 40% of the new homes should be in the form of affordable housing; and 5% of the new homes should be community-led and/or self-build homes.

As set out above, the role of the Interim Sustainability Appraisal is to consider key sustainability issues and the likely effects of broad principles of residential development. Detailed site considerations, which are also subject to strategic considerations such as the approach to development within the South Bristol Link, will be the subject of future Sustainability Appraisals.

Key sustainability issues are therefore as follows:

- All three sites are currently designated as Green Belt and are overwhelmingly greenfield in nature.
- Two proposed development allocations within the Green Belt, Yew Tree Farm and Elsbert Drive, are both located in areas which are not considered to be highly deprived (Decile 7 and 8 of the IMD 2019). Land at Ashton Gate, however, is located within an area of higher deprivation (Decile 3 of the IMD 2019). This is similarly the case for proportions of people who are involuntarily unemployed, where Yew Tree Farm and Elsbert Drive are within an area that is not considered to exhibit high rates of unemployment, whereas Land at Ashton Gate is in an area of higher unemployment (Decile 3 of the IMD 2019).
- None of the proposed development allocations within the Green Belt are within an AQMA, or cumulative impact area.
- None of the proposed development allocations are within a Conservation Area or contain Listed Buildings. Although, Yew Tree Farm is adjacent to the Grade II Listed Registered Park and Garden.
- In terms of ecological designations:
 - Land at Elsbert Drive does not overlap within any local or national ecological designations. It does however fall within a SSSI Impact Zone, for which the statutory nature conservation bodies are required to be consulted for industrial-type development applications.
 - Land at Yew Tree Farm overlaps with the Land South East of Colliter's Brook Wildlife Corridor in the north and is adjacent to the Colliter's Brook Site of Nature Conservation Interest. Similar to above, the area does fall within a SSSI Impact Zone, although consultation is mainly for industrial-type applications.
 - Land at Ashton Gate is almost entirely designated as a Wildlife Corridor ('land north of Ashton Vale Fields') and is adjacent to the Ashton Vale Fields Site of Nature Conservation Interest. Unlike the other two development allocations, this site falls within a SSSI Impact Zone for which residential development of 100 units or more requires consultation with the statutory nature conservation bodies.

- No land within the three proposed development allocations is occupied by allotments.
- Flood risk within Land at Elsbert Drive and Yew Tree Farm is considered to be low, with only Yew Tree Farm subject to a small proportion of Low Surface Water flood risk. Land at Ashton Gate is subject to high levels of risk associated with Longmoor Brook in the north; this results in areas of Flood Risk Zone 3b around the Brook, more extensive areas of Flood Zone 2 and higher levels of surface water flood risk across the site.
- In terms of Agricultural Land Classification, all three sites contain Grade 3 land. Land at Ashton Gate is comprised of Grade 3 Agricultural Land, whereas Land at Elsbert Drive and Yew Tree Farm also contain around a third Urban Land Classification.
- Neither Land at Elsbert Drive and Yew Tree Farm are within the Heat Connection Priority area, however around half of the Land at Ashton Gate is within this area.

Draft Policy DS11 Development allocations – southwest Bristol

SEA Theme	SA Framework Objective	D-M Criteria	Assessment of Sustainability Effects						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	++/?	++/?	++/?	D	P	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design. AM: In light of the withdrawal of the JSP, establish BCC evidence basis for requesting 40% affordable housing.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	--/?	--/?	--/?	D	P	Local	As above, plus: R: Green Belt land; AG: Local businesses.	AM: Provide mitigation related to loss of green space, and establish the exceptional circumstances case for the release of these three specific sites from the Green Belt. Consider Green Belt compensatory measures. MB: Detail place principles which could include the requirement for development to make efficient use of land, in line with Urban Living principles and the Local Plan Development Strategy. Proposals should be developed in a comprehensive/co-ordinated manner that accounts for other sites in the locality.
	3. Ensure easy and affordable access to key services	DMC8	?	?	?	D	Both	Local	R: Bristol's local economy; Bristol's population; AG: Local businesses.	AM: Require either provision of mixed use development which is proportionate to the scale of the development allocations, or reference to walking and cycling connectivity to nearby centres within Bristol.
	4. Increase participation in cultural and community activities	DMC9	?	?	?	I	Both	Local	AG: Bristol's population.	MB: Include support for the development of new cultural/community facilities, as appropriate.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	Both	Both	Local and City-wide	R: Public health. AG: Bristol's population.	CR: Include reference to retained and draft transport DM policies. MB: Include specific forms of green infrastructure that could be conducive to good health, including public realm enhancements and detail of specific pedestrian and cycling connections (i.e. detailed location, responsibility for delivery, cost, phasing).
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	+/?	+/?	+/?	Both	Both	Local.	R: Bristol's population. AG: All groups.	MB: Ensure physical access to, and catchment access to, educational establishments outside the GRA, to increase participation rates in education and skills development.
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	?	?	?	I	Both	Local and City-wide	R and AG: Local businesses, Bristol's population; Local economy.	MB: Consider support for delivery of flexible and/or co-working workspace.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	?	?	?	I	Both	Local.	R: Bristol's local economy; Bristol's population. AG: Local businesses.	AM: Require either provision of mixed use development which is proportionate to the scale of the development allocations, or reference to walking and cycling connectivity to nearby centres within Bristol.
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide	R: Cultural heritage; built environment; designated heritage assets; AG: Bristol's population.	CR: Include reference to existing and draft design and conservation policies. AM: Take account of designated heritage assets (including adjacent Grade II Landscape at the former CEGB Headquarters Registered Park and Garden).
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	P	Local; City-wide; trans-boundary	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM: Reference need to conserve and enhance ecological networks associated Land North of Ashton Vale Fields wildlife corridor, Land South East of Colliter's Brook wildlife corridor and Ashton Vale SNCI. AM: Land at Ashton Gate falls within a SSSI Impact Zone which requires appropriate consultation to be undertaken within statutory bodies.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	D	P	Local; City-wide; trans-boundary	As above.	AM: Require loss of GI to be replaced where it would enhance cohesive GI network. CR: Existing policy in relation to GI within development. MB: Include reference to: design guidance / exemplar designs in relation to GI provision; any updated strategic GI strategy; location of and responsibilities for delivery.
Transport and Movement	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	?	?	?	I	Both	Local and City-wide.	R: Public health; natural environment; AG: All groups	MB: Set out requirement for proportionate public transport contributions/infrastructure provision by developers in conjunction with Draft Policy IDC1.
	14. To maintain and improve the existing highway network	DMC30 DMC31	?	?	?	D	P	Local; City-wide; trans-boundary	R and AG: Highway network; public health; Bristol and North Somerset's population; natural environment	AM: Strengthen accessibility to local public transport routes and provide enhanced connectivity with surrounding areas, cycle provision, pedestrian route improvements and local highway improvements. AM: Set out safeguarded transport corridors, and proposed diversion of Ashton Value Road, as necessary.
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	Both	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Include reference to latest climate change projections for flood risk. AM: Require sequential test to ensure development is located outside of the current and future floodplain of the Longmoor Brook. MB: Consider opportunities for maximising green infrastructure associated with Longmoor Brook. CR: Retained Policy BCS16.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local and City-wide	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management. MB: Acknowledge location on Grade 3 Agricultural land and loss of existing food growing space, by including requirements for provision of new allotment or food growing land within new proposals.
	17. Minimise air and noise pollution	DMC38	?	?	?	I	Both	Local; City-wide; trans-boundary	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+/?	+/?	+/?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Suggest reference is made to the Heat Connection Zone, with an associated requirement for any future development proposals.

Evaluation of Effects	<p>Scale of effects: The scale of effects of this draft policy would be predominantly attributable to the specific sites set out within draft policy DS11, however the principles behind this policy would likely have effects upon adjacent land and key receptors, such as Ashton Fields SNCI. There is potential for positive cumulative effects within the area, for example the provision of affordable homes, however there could be uncertain effects elsewhere which will require clarification through further iterations of the draft policy. Consideration should therefore be given to the cumulative impacts: on the local transport network and accessibility to public transport; accessibility to local employment; green infrastructure and ecological designations such as the SNCI; flood risk associated with Colliter's Brook and Longmoor Brook; and loss of Grade 3 Agricultural Land and provision of Green Belt compensatory measures at this location.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> As the policy text proposes a defined capacity for each site, it is considered that this Policy Option could have significant positive effects for SA Objective 1 (DMC1). By requiring 40% of the new homes to be in the form of affordable housing and 5% of the new homes to be community-led and/or self-build homes, each of the sites perform similarly against DMC2, DMC3 and DMC4. Effects are also partly unknown and remain dependent upon site specific proposals. It is considered that this draft policy could result in significant negative effects for DMC5. As all three sites are sited on greenfield land within the Green Belt, development could produce negative effects for DMC7. As these sites are within the Outer Urban Area, draft Policy UL2 requires a density of 60dph; however this would not generate positive effects or promote the conservation or wise use of land (DMC6). There is no provision of services within the boundary of the Green Belt development allocations themselves. Whilst Elsbert Drive is within 800m of Bishopsworth Local Centre, neither Yew Tree Farm nor Land at Ashton Gate are within walking distance of defined Local Centres (Objective 3 DMC8 and Objective 9 DMC23). Draft policy text could consider whether provision of mixed use development which is proportionate to the scale of the proposed development allocations could be required, or reference to walking and cycling connectivity to nearby centres. Within this interim stage of the SA, the assessment of this draft policy against these requirements is uncertain. None of the three Green Belt sites contain community facilities. This draft policy is considered to produce unknown effects for DMC8 and DMC9, however, the policy text itself does not include the requirement for the development of new community facilities. This draft policy has the potential to produce minor positive effects against DMC10 and DMC11, as Land at Ashton Gate is located within the top 30% of the most deprived areas within the city (based upon 2019 IMD Data). Development of this site therefore has the potential to transform the built environment via delivery of residential development and any associated infrastructure including sustainable transport linkages or public realm improvements. However, effects are also partly unknown and remain dependent upon details such as the design and the scale of development delivered. For the remaining sites (Yew Tree Farm and Land at Elsbert Drive), sustainability effects against this SA Objective are considered to be neutral as these sites are located within areas of lower deprivation. Each of the sites proposed for residential development are located within 400m of an existing Important Open Space, including Bedminster Down Common, which is proposed to be retained as Local Green Space within the new Local Plan. Whilst the locational adjacency of the proposed allocations to these areas of open space has the potential to maintain/improve positive well-being and healthy lifestyles, it is not clear how open space will be provided on site at this stage. None of the sites proposed under DS11 are located within an existing AQMA or cumulative impact area, and as such, it is considered that future occupants/users of development could be subject to relatively good air quality relative to other GRAs within the City. Although the provision of homes could have health benefits, this would result in the loss of green spaces, and therefore effects are overall uncertain. There are no educational establishments within the development allocations themselves. However, all of the proposed sites are located within acceptable walking distances of an educational establishment (early years' facility, a primary and secondary school) and as such this draft policy is considered overall to generate positive effects for DMC16 as it is considered that there is a high level of physical accessibility to such facilities. For Ashton Gate, however this is across strategic infrastructure; increasing walking and cycling opportunities should be considered within the next iteration of draft text. As the draft policy specifies sites for residential development as opposed to mixed use development, effects are unknown for SA Objective 8. However, as Land at Ashton Gate within an area with the 30% highest unemployment rates, consideration should be given to methods of mitigation. None of the sites proposed for residential development under DS11 are located within a designated Conservation Area or contain any listed features within their respective site boundaries. For Land at Yew Tree Farm, the site is adjacent to the Grade II Landscape at the former CEGB Headquarters Registered Park and Garden, and as such there is some potential for impact of new development on the historic environment/setting of this asset (DMC24). However, effects are unknown until detailed design and delivery phase, including details of any appropriate mitigation. There are varying levels of ecological designations across the three sites including adjacency to Land North of Ashton Vale Fields wildlife corridor, Land South East of Colliter's Brook wildlife corridor, Ashton Vale SNCI and location within a SSSI Impact Zone. There is potential for negative effects for SA Objective 11 in the absence of appropriate and proportionate ecological mitigation (DMC25). The delivery, scale and location of any net gain in biodiversity is subject to future development proposals and therefore remains uncertain (DMC26). As the draft policy does not include detailed development requirements, including GI and public realm improvements, sustainability effects for SA Objective 12 (DMC27) are unknown at this stage, depending upon the forthcoming policy provisions, including any integration with the existing GI network. The three proposed development allocations have relatively similar levels of accessibility. Land at Ashton Gate is better served by public transport as it is adjacent to the new Metrobus Route (M2 Long Ashton Park and Ride to City Centre) and could be relatively close to MetroWest proposals (subject to progression of these), although there is currently poor accessibility to adjacent bus stops and poor access to the highway network. Yew Tree Farm and Land at Elsbert Drive have reasonable levels of accessibility from the A38 and Highbridge Green respectively, with some local cycling connectivity. None of the three development allocations are served by rail infrastructure or proximity to a train station. To encourage a modal shift and reduce the need to travel, the draft policy text could require some provision of local workspaces alongside residential uses, new walking and cycling routes to connect to adjacent neighbourhoods and the wider cycle network, improved accessibility to existing public transport provision and green infrastructure enhancements (DMC28). The supporting text to the policy indicates that, should North Somerset Council take a similar approach to Green Belt land within the South Bristol Link road, then Bristol City Council will seek to engage with North Somerset and require safeguarding of corridors for transport infrastructure. Land at Ashton Gate includes some areas adjacent to Longmoor Brook and Colliter's Brook within Flood Risk Zones 2 and 3, however, flood risk across the other sites is considered to be low overall. While the design of new development within each of the sites is unknown until a later stage, it is considered that the potential for effects of development for local flood risk is therefore relatively low for Land at Elsbert Drive and Yew Tree Farm when appraised against SA Objective 15. For Land at Ashton Gate, draft policy text may consider the requirement for a Flood Risk Assessment or Sequential Test (as appropriate) to mitigate flood risk issues and ensure that development accounts for future climate change scenarios. The use of SUDS as set out by retained flood risk Policy BCS16 could provide appropriate mitigation for any adverse surface water flood risk at the site. Given that the area is not adjacent to vulnerable water bodies or groundwater protection zones, effects against DMC34 are neutral. Whilst development in the Green Belt would reduce carbon fixing, the extent to which this draft policy would deliver a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production is unknown until implementation of development and compliance with other draft policies (DMC35, DMC36). The Draft Policy and any future development requirements should acknowledge that the sites are located on Grade 3 Agricultural land, and in some cases (e.g. Land at Yew Tree Farm) would result in the loss of existing food growing space and as such should include requirements for replacement of / provision of new allotments or food growing land within the context of future development (DMC37). As set out above, the sites are not located within an existing AQMA or cumulative impact area. As such it is considered that the sites would not cause undue exposure of new development and its future occupants to high levels of pollutants (DMC38); however, the effects of development are also partly unknown, and remain dependent upon the design of development, alongside the availability and usage of sustainable and/or active travel modes for new development/regeneration to limit the impact of vehicular emissions, alongside any proposed mitigation delivered under Draft Policy HW2. With Land at Ashton Gate located within a Heat Connection Zone it is considered that there could therefore be opportunities for the use of low carbon and decentralised energy sources (DMC40), which would generate positive effects for SA Objective 18.
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Draft Policy DS12 New neighbourhood – Bath Road, Brislington

In the context of changes proposed to the Green Belt, as set out in Draft Policy DS10 above, Draft Policy DS12 outlines that the current Local Plan indicates that land in the Green Belt at South East Bristol acts as a contingency for meeting future housing needs. The development of this land is guided by the now withdrawn Joint Spatial Plan, where Bath Road was identified as a ‘Strategic Development Location’.

Key baseline and sustainability issues associated with the GRA are defined as follows:

- The GRA is located within an area of high deprivation and is an area that has a high proportion of working-age population who are involuntarily unemployed;
- A very small proportion of the GRA is located within an AQMA;
- The GRA is currently designated as Green Belt land, and therefore it does not contain any areas of Important Open Space. However, the site is within 400m of existing Important Open Space at Broomhill Road (Emery Road);
- A very small proportion of the GRA overlaps with the Avon Valley Conservation Area. There are no listed buildings within the site, however the area is adjacent to the Grade II Listed Brislington House Registered Park and Garden;
- The site is adjacent to Stockwood Road Open Space (Local Nature Reserve), which is located to the south; and approximately 72% of the site is located within an existing wildlife corridor (Agricultural Land at Brislington);
- The site comprises 56% Grade 3 agricultural land, and approximately 6% of the site overlaps with existing allotment land;
- A secondary school educational establishment is located within 800m of the GRA;
- The site is predominantly located within Flood Risk Zone 1 with patches of Flood Risk Zone 2 adjacent to Scotland Bottom Brook. There are areas of high and medium surface water risk within 5% and 8% of the site, respectively; and
- The site is adjacent to the River Avon, which is classified by the Environment Agency as ‘moderate’ water body status, accounting for both ecological and chemical pollutants. According to EA assessment, the water body failed on the ‘priority hazardous substances’ classification, with traces of mercury and phosphate identified¹⁴.

The Draft Policy DS12 sets out that development of the strategic site would amend the Green Belt boundary in this location and would deliver a minimum capacity of 750 homes.

Development will be expected to be delivered in accordance with Policy 7.3 of the JSP (now redundant due to withdrawal of the JSP), where development should include:

- 40% of the new homes in the form of affordable housing; and
- 5% of the new homes in the form of community-led / self-build homes.

In addition to the above, existing allotments on Bath Road will be retained in allotment use. Any development will ensure that there are no adverse impacts on allotment use.

¹⁴ <https://environment.data.gov.uk/catchment-planning/WaterBody/GB109053027371>

The Draft Policy outlines that the existing Brislington Park & Ride would be relocated to land near Hicks Gate Roundabout within Bath and North East Somerset in order to facilitate this strategic development location.

Furthermore, the Draft Policy sets out that there will be public consultation on a detailed framework for the development of this area. As such, it will be the role of the future Sustainability Appraisal to appraise this detailed framework, while the Interim SA will consider key sustainability issues and the likely effects of broad principles of residential development.

Draft Policy DS12 New neighbourhood – Bath Road, Brislington

SEA Theme	SA Framework Objective	D-M Criteria	Assessment of Sustainability Effects						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Assessment of Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	++/?	++/?	++/?	D	P	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design. AM: In light of the withdrawal of the JSP, establish BCC evidence basis for requesting 40% affordable housing. AM: Provide mitigation related to loss of green space, and establish the exceptional circumstances case for the release of these three specific sites from the Green Belt. Consider Green Belt compensatory measures. MB: Detail place principles which could include the requirement for development to make efficient use of land, in line with Urban Living principles and the Local Plan Development Strategy. Proposals should be developed in a comprehensive/co-ordinated manner that accounts for other sites in the locality. AM: Require either provision of mixed use development which is proportionate to the scale of the development allocations, or reference to walking and cycling connectivity to nearby centres within Bristol. MB: Include support for the development of new cultural/community facilities, as appropriate.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	--/?	--/?	--/?	D	P	Local	As above, plus: R: Green Belt land; AG: Local businesses.	
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	D	Both	Local	R: Bristol's local economy; Bristol's population; AG: Local businesses.	
	4. Increase participation in cultural and community activities	DMC9	?	?	?	I	Both	Local	AG: Bristol's population.	
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	++/?	++/?	++/?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design. CR: Include reference to retained and draft transport DM policies. MB: Include specific forms of green infrastructure that could be conducive to good health, including public realm enhancements and detail of specific pedestrian and cycling connections (i.e. detailed location, responsibility for delivery, cost, phasing).
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	Both	Both	Local and City-wide	R: Public health. AG: Bristol's population.	
Economy and Employment	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	+/?	+/?	+/?	Both	Both	Local and City-wide	R: Bristol's population. AG: All groups.	MB: Ensure physical access to, and catchment access to, primary educational establishments. MB: Consider support for delivery of flexible and/or co-working workspace, or demonstrate connectivity to local employment locations.
	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	?	?	?	I	Both	Local and City-wide	R and AG: Local businesses, Bristol's population; Local economy.	
Townscape and Landscape	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local.	R: Bristol's local economy; Bristol's population; AG: Local businesses.	AM: Require either provision of mixed use development which is proportionate to the scale of the development allocations, or reference to walking and cycling connectivity to nearby centres within Bristol. CR: Include reference to existing and draft design and conservation policies. AM: Take account of designated heritage assets (including adjacent Grade II* Brislington House Registered Park and Garden) and set out the impact of Green Belt release on the historic form of Bristol. AM: Reference need to provide compensatory measures for loss of wildlife corridor (Agricultural Land at Brislington), and conserve and enhance Stockwood Open Space, which is designated as both a Local Nature Reserve and SSCI. AM: Require loss of GI to be replaced where it would enhance cohesive GI network. CR: Existing policy in relation to GI within development. MB: Include reference to: design guidance / exemplar designs in relation to GI provision; any updated strategic GI strategy; location of and responsibilities for delivery.
	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide	R: Cultural heritage; built environment; designated heritage assets; AG: Bristol's population.	
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	P	Local; City-wide; trans-boundary	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	
Transport	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	D	P	Local and City-wide; trans-boundary	As above.	AM: Require loss of GI to be replaced where it would enhance cohesive GI network. CR: Existing policy in relation to GI within development. MB: Include reference to: design guidance / exemplar designs in relation to GI provision; any updated strategic GI strategy; location of and responsibilities for delivery.
	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	?	?	?	I	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	
Climate, Energy and Waste	14. To maintain and improve the existing highway network	DMC30 DMC31	?	?	?	D	P	Local; City-wide; trans-boundary	R: Bristol's highway network; public health; Bristol's population.	AM: Set out the implications of the transformational major schemes within the JLTP4 on the Bath Road Strategic Development Location, and the implications of relocating the Park and Ride. MB: Include reference to latest climate change projections for flood risk. MB: Consider opportunities for maximising green infrastructure associated with Scotland Bottom. CR: Retained Policy BCS16 and use of SUDs to mitigate surface water flood risk associated with Scotland Bottom. CR: Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management. CR: Air pollution mitigation proposed within draft policy HW2.
	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	Both	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	
	17. Minimise air and noise pollution	DMC38	?	?	?	I	Both	Local; City-wide; trans-boundary	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	

Evaluation of Effects	<p>Scale of effects: The scale of effects of this draft policy would be predominantly attributable to the Bath Road area within draft policy DS12. There is potential for positive cumulative effects within the area, for example the provision of affordable homes, however there could be uncertain effects elsewhere which will require clarification through further iterations of the draft policy. Consideration should be given: to the impact of development on the local and strategic transport network; accessibility to local employment and local centres; green infrastructure enhancement and ecological designations such as the adjacent Stockwood Open Space; flood risk associated with the Scotland Bottom Watercourse and provision of Green Belt compensatory measures at this location.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> As the policy text proposes a capacity potential of 750 homes, it is considered that this Policy Option could have significant positive effects for SA Objective 1 (DMC1). By requiring 40% of the new homes to be in the form of affordable housing and 5% of the new homes should be community-led and/or self-build homes, this draft policy is considered to produce significant positive effects for the provision of housing of mixed type, alternative methods of delivery and housing for the needs of the wider community (DMC2, DMC3, DMC4). Effects are also partly unknown and remain dependent upon site-specific proposals. It is considered that this Policy Option could provide significant negative, unknown effects for SA Objective 2 (DMC5). Given the predominantly greenfield and Green Belt nature of this site, development of this site could produce significant negative effects for DMC7. Being sited within the Outer Urban Area, draft Policy UL2 requires that residential development density be 60dph, however this would not generate positive effects or promote the conservation or efficient use of land (DMC6). There is no provision of services within the SDL boundary itself. Brislington Local Centre exists within 800m of the Strategic Development Location, however walking routes are poor along the busy A4 Bath Road and beyond areas of industrial uses. Draft policy text could consider whether provision of mixed use development which is proportionate to the scale of the proposed development allocations could be required, or require enhanced walking and cycling connectivity to nearby centres. Within this interim stage of the SA, the assessment of this draft policy against these requirements is overall positive but uncertain. There is no provision of formal community facilities within the SDL boundary. This draft policy is considered to produce unknown effects for DMC8 and DMC9, as the policy text itself does not include the requirement for the development of new community facilities. It is considered that this draft policy has the potential to produce significant positive effects for SA Objective 5 (DMC10 and DMC11) where Bath Road development location is within the top 10% of the most deprived areas within the city (based upon 2019 IMD Data). Development of this site therefore has the potential to transform the built environment via delivery of residential development and any associated infrastructure including sustainable transport linkages or public realm improvements. Effects are also partly unknown and remain dependent upon site-specific proposals. Bath Road is located within 400m of an existing Important Open Space, Broomhill Road (Emery Road), and within 800m of Victory Park, which is proposed to be retained as Local Green Space within the new Local Plan. Whilst draft policy text should require development to provide additional open space, it is considered that the locational adjacency of these sites has the potential to maintain/improve positive well-being and healthy lifestyles (DMC13). Approximately 2% of the site is located within an existing AQMA, and as such, it is considered that future occupants/users of development could be subject to relatively poor air quality (DMC12), subject to proposed mitigation and the siting of development. Although the provision of homes could have health benefits, this would result in the loss of green spaces, and therefore effects are overall uncertain. Bath Road is located adjacent to a secondary school (Oasis Academy) but not within 800m of a primary school. The draft policy is therefore considered to have uncertain and positive effects for DMC16; for which accessibility to local primary schools should be encouraged. As the draft policy specifies the SDL will be developed for residential uses as opposed to mixed use development, effects are unknown for SA Objective 8. However, as Bath Road is in one of the highest areas of unemployment, consideration should be given to mitigation measures. Less than 1% of the site is located within a designated Conservation Area (Avon Valley), and as such there is some potential for impact of new development on the historic environment (DMC24). While the site does not contain any listed features within its proposed boundary, the site is proximate to the Grade II* Brislington House Registered Park and Garden (located beyond the A4 Bath Road to the north) and as such there is some potential for impact of new development on the historic setting of this asset (DMC24). Effects of Green Belt release on the historic form of Bristol should also be considered here. At this stage of the Local Plan Review, effects are considered uncertain and subject to details of appropriate mitigation. The SDL is located within a wildlife corridor (Agricultural Land at Brislington) and is adjacent Stockwood Open Space, which is designated as both a Local Nature Reserve and SSSI. There is the potential for negative effects for SA Objective 11 in the absence of appropriate and proportionate ecological mitigation (DMC25). In addition, the site is located within a Wildlife Corridor, and as such effects could be negative for species that utilise these areas unless suitable mitigation is provided (e.g. alternative habitat provision). The delivery, scale and location of any net gain in biodiversity is subject to future development proposals and therefore remains uncertain (DMC26). As the draft policy does not include detailed development requirements, including GI and public realm improvements, sustainability effects for SA Objective 12 (DMC27) are largely unknown at this stage, depending upon the forthcoming policy provisions. However, as the draft policy sets out that the existing allotment land would be required to be safeguarded, it is considered that this draft text would likely produce some positive effects for DMC27 and DMC37 through ensuring future food growing provision. The SDL displays moderate levels of accessibility. Whilst Bath Road is a strategic corridor into the City, walking routes and cycling routes in Brislington are relatively poor, and vehicular accessibility between Bristol and Bath is considered to be poor. There are a number of public transport services available along Bath Road, including the 349, A4, X39, 435, SB1,178 and 668. Within the Joint Local Transport Plan, transformational major schemes are set out for the A4 Bath Road between Bristol and Bath – future iterations of the draft policy should set out the implications of these schemes. Flood risk across the proposed site is considered to be low overall, with none of the site located within Flood Risk Zone 3a or 3b. Whilst only 2% located within Flood Risk Zone 2 (associated with Scotland Bottom), there are areas of high surface water flood risk. Whilst it is considered that the potential for effects of development for local flood risk is therefore relatively low when appraised against SA Objective 15, the use of SUDS as set out by retained flood risk Policy BCS16 are likely to be required to ensure appropriate mitigation for any surface water flood risk at the site. Draft policy text may consider the requirement for a Flood Risk Assessment or Sequential Test (as appropriate) to mitigate flood risk issues and ensure that development accounts for future climate change scenarios. Whilst is not adjacent to any groundwater protection zones, it is adjacent to the River Avon, which is classified by the Environment Agency catchment data as ‘moderate’ in water body status. In addition, the GRA could be affected by/could contribute to the water quality of the Brislington Brook source to River Avon, which is classified as ‘Poor’ water quality status by the Environment Agency¹⁵, effects against DMC34 are therefore uncertain. Whilst development in the Green Belt would reduce carbon fixing, the extent to which this draft policy would deliver a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production is unknown until implementation of development and compliance with other draft policies (DMC35, DMC36). Requiring retention of the allotments could result in positive effects for DMC37. As set out above, the site is partially located within an existing AQMA (approximately 2%) and as such it is considered that could cause undue exposure of new development and its future occupants to high levels of pollutants (DMC38), subject to the design and siting of development and any mitigation proposed. However, the effects of development are also partly unknown, and remain dependent upon the design of development and proposed mitigation.
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¹⁵ ID: GB109053021980. <https://environment.data.gov.uk/catchment-planning/WaterBody/GB109053021980>

Draft Policy DS13 Lockleaze Area of Growth and Regeneration

The Lockleaze Area of Growth and Regeneration (GRA) is located within North Bristol, where the Draft Local Plan proposes a minimum of 6,000 new homes across the entire area in accordance with the Development Strategy. The area has experienced significant regeneration in recent years, including public realm improvements at Gainsborough Square and infill development on several small sites owned by BCC. It is considered that the existing dwelling density of Lockleaze is low, compared with other areas of the city, resulting in a limited population to support the existing centre at Gainsborough Square and public transport services.

Key baseline and sustainability issues associated with the GRA are defined as follows:

- The GRA is located within an area of high deprivation and is an area that has a high proportion of working-age population who are involuntarily unemployed.
- The area is not within an AQMA or cumulative impact zone.
- Almost one fifth of the GRA is made up of land that is currently designated as Important Open Space (including Rowlandson Gardens, Gainsborough Square, Ashley Down Allotments and Railway Land, Lockleaze Primary School, Dovercourt Road Allotments and Dovercourt Road Open Space). The vast majority of these are proposed to be retained as Reserved Open Spaces or Local Green Spaces within the Local Plan Review.
- The Morris Road Railway Cutting and Bonnington Walk SNCI are located within the GRA. The GRA overlaps with several wildlife corridors, including the Bonnington Walk Open Space, Railway Land areas, Lockleaze School playing field, Land around Dovercourt Depot, Land rear of Downman Road and Dovercourt Road Allotments and Open Space (amongst others).
- A small percentage of the site (approximately 3%) to the north of the site is located within the Stapleton and Frome Valley Conservation Area, and the GRA is bounded at the south by the Grade II Stoke Park Registered Park and Garden in the south west. There are no listed features within the GRA site boundary.
- The area is not well-connected to existing communities in south and west Bristol.
- Approximately 1% of the GRA is currently allotment land (Dovercourt Road Allotments).
- The GRA boundary includes land within approximately 1% of Flood Risk Zone 3b and 2% within Flood Risk Zone 2.

Draft Policy DS13 (the 'March 2019 Consultation Option') sets out principles related to the regeneration and development of the Lockleaze GRA; it includes the following requirements:

- Residential development of a minimum capacity of 1,200 homes through a combination of existing allocated sites and new development opportunities, at densities and forms appropriate to achieving this figure;
- Provision of high-quality workspace, providing for a range of business uses, as part of the development mix in the area;
- New and improved walking and cycling routes to connect to the development to the surrounding neighbourhoods, public transport facilities and the wider cycle network, including improved accessibility over the railway and upgrades to existing public rights of way; and
- Green infrastructure and public realm enhancements.

In addition, development will be expected to:

- Make efficient use of land; and demonstrate that opportunities have been sought to progress more comprehensive or co-ordinated forms of development with other sites in the locality;
- Be supported by transport improvements which will include public transport enhancements enhanced connectivity with surrounding areas, cycle provision, pedestrian route improvements and local highway improvements;
- Provide for an appropriate form and amount of new workspace as part of the mix of uses in the area, where sites currently or recently used for business purposes are proposed to be redeveloped for other uses; and
- Contribute to an appropriate mix of housing types.

The policy sets out that where sites are developed, a density of 50-60dph will be sought as a minimum, but higher densities of 100dph or more may be appropriate, subject to a co-ordinated approach to development which delivers quality urban design.

Draft Policy DS13: Lockleaze

SEA Theme	SA Framework Objective	D-M Criteria	Assessment of Sustainability Effects						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	++/?	++/?	++/?	D	P	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design. CR: Explicitly state requirement for affordable housing as a percentage, which should be informed by an assessment of viability at the plan-level. CR: Self-build and/or community led housing draft policies and consider sites for the delivery where appropriate evidence exists.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	?	?	?	D	P	Local	As above, plus: R: Brownfield sites and previously developed sites; AG: Local businesses.	MB: Publish masterplan to ensure that development is comprehensive and coordinated, and is consistent with delivering high quality place-making. MB: Provide good practice examples of 'well designed infill at higher densities' within an existing low density area.
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	D	Both	Local	R: Bristol's local economy; Bristol's population AG: Local businesses.	AM: Consider monitoring of local services within Gainsborough Square to ensure that there is sufficient provision to match increase population density within the area.
	4. Increase participation in cultural and community activities	DMC9	?	?	?	I	Both	Local	AG: Bristol's population.	MB: Include support for enhancement of existing cultural/community facilities.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	++/?	++/?	++/?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	CR: Include reference to retained and draft transport DM policies. MB: Include detail of specific pedestrian and cycling connections (i.e. detailed location, responsibility for delivery, cost, phasing) which could support good health.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	+/?	+/?	+/?	Both	Both	Local.	R: Bristol's population. AG: All groups.	n/a
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	MB: Support delivery of flexible and/or co-working employment space; and, include reference to delivery of efficient zero carbon forms of workspace/office space. AM: Require proposals for any redevelopment of business use sites to ensure defined quantum of workspace within mixed use development uses, to safeguard a range and balance of workspace.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local.	R: Bristol's local economy; Bristol's population; AG: Local businesses.	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide	R: Cultural heritage; built environment; AG: Bristol's population.	CR: Include reference to existing and draft design and conservation policies. AM: Take account of designated heritage assets (including the Stapleton and Frome Valley Conservation Area and Grade II Listed Stoke Park).
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	-/?	-/?	-/?	I	P	Local and City-wide	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM: Reference need to conserve and enhance ecological networks associated with the Bonnington Walk SNCI.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+/?	+/?	+/?	D	P	Local and City-wide; trans-boundary	As above.	AM: Require loss of GI to be replaced where it would enhance cohesive GI network. CR: Existing policy in relation to GI within development. MB: Include reference to: design guidance / exemplar designs in relation to GI provision; any updated strategic GI strategy; location of proposals and responsibilities for delivery.
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	MB: Set out requirement for proportionate public transport contributions/infrastructure provision by developers with proposals for sites within the GRA.
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	D	P	Local and City-wide.	R: Bristol's highway network; public health; AG: Bristol's population.	AM: Set out the detail associated with improvements over the railway and upgrades to existing public rights of way.
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	Both	Both	Local and City-wide.	R: Natural environment (water); AG: Bristol's population; local wildlife.	AM: Sequential approach should be applied to avoid Horfield Brook; with development avoiding the area to the south east of Dovercourt Road allotments and west of Petherbridge Way. This area is subject to Flood Risk Zone 2, 3a and 3b. CR: Retained Policy BCS16.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local and City-wide.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	MB: Suggest inclusion of/integration of new food growing space with existing allotment land, particularly give there are areas of Grade 3 Agricultural Land within the GRA. CR: Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management.
	17. Minimise air and noise pollution	DMC38	+/?	+/?	+/?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	n/a
Evaluation of Effects	<p>Scale of effects: The scale of effects of this draft policy would be predominantly attributable to the Growth and Regeneration Area and the specific sites within it. However, this draft policy would likely have effects upon adjacent land and key receptors (such as the Bonnington Walk SNCI). Whilst greater density within this Growth and Regeneration Area could have beneficial effects for public transport within the area and the vitality of the Lockleaze Local Centre, it could have uncertain and potentially negative effects for land that is currently greenfield within the area. Cumulative effects may arise from the delivery of more affordable housing, employment opportunities, localised energy demands and waste management, amongst other key sustainability issues.</p>									

Social, economic and environmental effects:

- This draft policy could have positive effects for housing delivery, and the quantum of 'at least 1,200 new homes' is specified within policy text (DMC1). In absence of JSP policies for affordable housing or in-text references to appropriate levels of affordable housing, assessment of this policy against DMC2 is uncertain. Reference should be made to the appropriate percentage target of affordable housing provision (in accordance with BCS17, DM3 or equivalent) which should be informed by a proportionate assessment of viability at the plan-level. Cross-reference could be made to proposed policies for community-led housing, and sites may be identified where there is sufficient evidence to do so (DMC4).
- Place principles set out by the draft policy text include the requirement for development to make efficient use of land, in line with Urban Living principles and the Local Plan Development Strategy. With proposals required to be developed in a comprehensive/co-ordinated manner, it is considered that this draft policy could provide positive, yet unknown, effects for SA Objective 2 (DMC5). Around a fifth of the GRA is currently designated as Important Open Space; however the majority of this is proposed to be retained as Reserved Open Space within the Local Plan Review. Development within Lockleaze is therefore based on making efficient use of land, and ensuring well-designed infill development at higher densities. Being sited within the Outer Urban Area, draft Policy UL2 requires that proposals for residential development reflect 50-60dph as a minimum. The effects are therefore complex: encouraging infill within an area of low density could achieve positive effects, however this may have uncertain effects for land which is currently greenfield.
- There is some provision of services within the boundary of the GRA itself, including The Wordsworth Centre, The Hub, Cameron Centre, The Langley Centre, and, Lockleaze Library. The GRA overlaps with the Lockleaze Local Centre (Objective 3 DMC8 and Objective 9), and whilst the Gloucester Road Town Centre is within an 800m walking distance there are no easy direct walking routes to this centre. The draft policy text does not require the development of retail and leisure development, as there are ambitions to increase population density to support the existing centre at Gainsborough. The assessment of this draft policy against these requirements is therefore positive but uncertain.
- This draft policy is considered to produce unknown effects for DMC9. Whilst there is existing provision within the GRA, the draft policy text itself does not include the requirement for the development of new community facilities. A net gain of community or community service facilities would be unknown until site-specific proposals are made.
- It is considered that this draft policy has the potential to produce positive effects for SA Objective 5 (DMC10 and DMC11), as the GRA is located within an area of high deprivation (based upon 2019 IMD Data). Development and regeneration of this GRA therefore has the potential to transform the built environment through improved sustainable transport linkages, public realm improvements and offering opportunities for investment in local employment through the provision of workspace. Effects are also partly unknown and remain dependent upon site specific proposals.
- The GRA includes several areas of Important Open Space and is adjacent to an extensive area of green space, Stoke Park Estate (proposed to be protected as Local Green Space within the Local Plan) which has potential to maintain/improve positive well-being and healthy lifestyles (DMC13). As the area is not within an existing AQMA or Cumulative Impact Area, it is considered that future occupants/users of development within the GRA are unlikely to be subject to poor air quality (relative to the City Centre). Effects are however unknown and related to factors including trip generation brought by any future development.
- The GRA includes an early years facility, primary (Stoke Park Primary) and secondary school (Trinity Academy) within its boundary, and as such this draft policy is considered to generate positive effects for DMC16 as it is considered that there is a high level of physical accessibility to such facilities.
- This draft policy is considered to produce positive effects for SA Objective 8 where development is required to provide high quality workspace (DMC17). The sector type of employment/business use is not specified within policy text, and therefore effects of this policy text are uncertain for DMC18; however, provision of high-quality workspaces may support: creative, cultural and digital industries; and financial, business and legal 'tech' services as defined within the Local Industrial Strategy. As the GRA is located in an area with a high rate of unemployment, it is also considered that this draft policy could generate positive effects for DMC19. It is uncertain the extent to which this draft policy would support delivery of carbon neutral employment space, although the site itself is accessible by sustainable transport modes and this could serve to encourage a shift from unsustainable modes of travel to places of employment (DMC21).
- A small percentage of the site (3%) to the north of the GRA is located within the Stapleton and Frome Valley Conservation Area, and the Grade II Stoke Park Registered Park and Garden is located outside the southern boundary of the GRA. There are no listed buildings within the GRA site boundary. As such, the potential for impact on the historic environment is considered to be relatively low, although setting and impact on any significant vistas would need to be accounted for. Effects are also partly unknown and remain dependent upon site specific proposals.
- Several wildlife corridors, the Bonnington Walk SNCI, RIG and SSSI Impact Zone are located within the GRA. Therefore, there is the potential for negative effects for SA Objective 11 in the absence of appropriate and proportionate ecological mitigation (DMC25). The delivery, scale and location of any net gain in biodiversity is subject to future development proposals and therefore remains uncertain (DMC26).
- The Growth and Regeneration Area is less well served by strategic transport provision when compared to other GRAs. There are a number of bus services which convene around Gainsborough Square (including the 10, 11, 24, 72 and 72a) and a strategic cycleway passes through the area (the Concorde Way). To encourage a modal shift and reduce the need to travel, the draft policy text requires development to provide a range of workspaces alongside residential uses, new walking and cycling routes to connect to adjacent neighbourhoods and the wider cycle network, improved accessibility over the railway line and green infrastructure enhancements. Greater density within this Growth and Regeneration Area could have a positive effect on the ability to improve access to public transport and quality of sustainable transport modes (DMC28).
- As the draft policy references the requirement for development to include GI and public realm improvements, it is considered that this draft policy could therefore generate positive effects for SA Objective 12 (DMC27); however, effects are partly uncertain as the nature of such improvements, and their integration with the existing GI network, remains contingent upon detailed design.
- The GRA boundary includes land within 1% of Flood Risk Zone 3b and 2% within Flood Risk Zone 2, with approximately 5% of the GRA being located within areas of high surface water risk. While the exact location of new development within the GRA boundary is unknown, it is considered that the potential for effects of development for local flood risk is relatively low when appraised against SA Objective 15. Development should avoid Horfield Brook (the area to the south east of Dovercourt Road allotments and west of Petherbridge Way) as this is the area subject to Flood Risk Zone 2, 3a and 3b. Elsewhere, the use of SUDS as set out by retained flood risk Policy BCS16 could provide appropriate mitigation for any adverse surface water flood risk at the site.
- As the GRA includes a small area of existing allotment land (Dovercourt Road Allotments) and an area of Grade 3 Agricultural Land, it is considered that there is some potential for expansion and integration of food growing sites within the GRA as part of mixed-use development, which could generate positive effects for SA Objective 16 (DMC36). Given that the area is not adjacent to vulnerable water bodies or groundwater protection zones, effects against DMC34 are neutral. The extent to which this draft policy would deliver a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production is unknown (DMC35, DMC36); this remains dependent upon the nature of detailed design proposals and compliance with other draft Local Plan policies in relation to climate change and sustainability.
- As set out above, given the GRA is not located within an existing AQMA or Cumulative Impact Area, it is considered that this could ensure minimal exposure of new development to high levels of existing pollutants (DMC37); however, the effects of development are also partly unknown, and remain dependent upon the nature of development, and the availability and usage of sustainable or active travel modes for new development to limit the impact of vehicular emissions.

Draft Policy DS14 Central Southmead Area of Growth and Regeneration

The Central Southmead Area of Growth and Regeneration (GRA) is located within North Bristol; an area which proposes a minimum of 6,000 new homes.

The Southmead Development Trust has developed a Community Plan for the area (Southmead Community Plan 2015-2025). The plan seeks to deliver new development, which is safe, healthy and sustainable with a mix of affordable homes and private housing. Improvements to local parks and open spaces are identified as a priority. Key baseline and sustainability issues associated with the GRA, including those identified through the Southmead Community Plan¹⁶, are defined as follows:

- The GRA is located within one of the city's highest areas of deprivation and is an area that has a high proportion of working-age population who are involuntarily unemployed, with few local businesses in the immediate area;
- The area is not within an AQMA or cumulative impact zone;
- A fifth of the GRA is made up of land that is currently designated as Important Open Space (including Glencoyne Square which makes up around 15% of the total GRA area, Greystoke Avenue Open Space and Embleton Road Open Space). None of these areas are proposed to be retained as Reserved Open Space within the Local Plan Review. However, it is noted from the Community Plan that residents strongly value Southmead's existing parks and green spaces outside the GRA area, with a number of 'friends of' groups – including Badocks Wood, Elderberry Walk. In addition, green space within the wider Southmead area could be improved for families and young people, made more accessible for less mobile individuals, and could be better maintained;
- A small area of the GRA (approximately 2%) overlaps with an existing wildlife corridor, Greystoke Avenue Open Space is located to the south of the GRA;
- The GRA site boundary does not overlap with any existing Conservation Areas or contain any listed features;
- The GRA is located entirely within Flood Risk Zone 1, with small areas within the site boundary being subject to high and medium surface water flood risk (approximately 4% and 11%, respectively);
- The Southmead area experiences significant social and health problems – including alcohol misuse, mental health issues, financial hardship and social isolation; and there is currently no open/direct access drug or alcohol service in Southmead;
- Long standing older resident community with relatively high levels of community engagement (15% of residents of Southmead are over 65 based on 2011 Census data);
- There is identified need for improved facilities for employment support and training; business start-ups; advice and counselling services; young people services; health and wellbeing services; and family, carers and older peoples support within Southmead;
- Lack of diversity within the existing housing mix, where the Southmead Community Plan notes that there is a shortage of smaller homes in the area for those looking to downsize;

¹⁶ <http://southmeadcommunityplan.co.uk/wp-content/uploads/2015/02/Community-Summary.pdf>

- Poor accessibility for less mobile people, with poor bus links to Bristol Parkway rail station and the wider rail network, poorly located bus lanes and insufficient levels of community transport;
- Obesity is significantly above the average for reception aged children and has increased in adults. (33% of Southmead residents); and
- Falling levels of reported crime and anti-social behaviour (ASB).

Draft Policy DS14 (the 'March 2019 Consultation Option') sets out principles related to the regeneration and development of the Central Southmead GRA; it includes the following requirements:

- Residential development of approximately 300 homes, including affordable housing;
- The redevelopment of Glencoyne Square for new homes with open space;
- Provision of community facilities to replace and enhance existing provision, with a potential new community building on Greystoke Avenue; and
- Improved pedestrian and cycle routes through Glencoyne Square and Arnside Road.

In addition, development will be expected to:

- Make efficient use of land; and demonstrate that opportunities have been sought to progress more comprehensive or co-ordinated forms of development with other sites in the locality;
- Be of a scale and design appropriate to Central Southmead's district centre location;
- Be supported by transport improvements which will include public transport enhancements enhanced connectivity with surrounding areas, cycle provision, pedestrian route improvements and local highway improvements; and
- Contribute to an appropriate mix of housing types.

The policy sets out that where sites are developed, a density of 60dph will be sought as a minimum, but higher densities of 100dph or more may be appropriate, subject to a co-ordinated approach to development which delivers quality urban design.

Draft Policy DS14: Central Southmead

SEA Theme	SA Framework Objective	D-M Criteria	Assessment of Sustainability Effects						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Medi	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	++/?	++/?	++/?	D	P	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design. CR: Explicitly state requirement for affordable housing as a percentage, which should be informed by an assessment of viability at the plan-level. CR: Self-build and/or community led housing draft policies and consider sites for the delivery where appropriate evidence exists. Consider requiring elderly care to meet ageing population within the area.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	?	?	?	D	P	Local	As above, plus: R: Brownfield sites and previously developed sites; AG: Local businesses.	CR: Consented development proposal at Glencoyne Square (Ref. 19/04705/F) be included within policy text and associated mapping, with plans for the replacement of green space and tree planting to be clearly identified. MB: Provide good practice examples of 'well designed infill at higher densities' within an existing low density area.
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	D	Both	Local	R: Local economy and population; AG: Local businesses.	MB: Require development within the Arnside Road District Centre to have active frontages.
	4. Increase participation in cultural and community activities	DMC9	++/?	++/?	++/?	I	Both	Local	AG: Local population.	AM: Establish the location for the new community building on Greystoke Avenue within policy text.
	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	++/?	++/?	++/?	I	Both	Local and City-wide	R: Built environment. AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	Both	Both	Local and City-wide	R: Public health. AG: Bristol's population.	CR: Include reference to retained and draft transport DM policies. MB: Replacement or enhancement of existing open spaces will be essential to maintaining or improving positive well-being and healthy lifestyles. This could include defined forms of green infrastructure, urban food growing and public realm enhancements. MB: Include detail of specific pedestrian and cycling connections through Glencoyne Square and Arnside Road (i.e. detailed locations, responsibility for delivery, cost, phasing).
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	+/?	+/?	+/?	Both	Both	Local	R: Local population. AG: All groups.	MB: Ensure physical access to, and catchment access to, educational establishments in neighbourhoods adjacent to the GRA. This is to increase participation rates in education and skills development.
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	-/?	-/?	-/?	Both	Both	Local	R: Bristol's local economy; AG: Local businesses; Bristol's population.	AM: Suggest inclusion of small-scale employment/workspace or training centre within proposals for mixed use development, noting the high level of unemployment and low skill level within the wider area.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local	R: Bristol's local economy; Bristol's population; AG: Local businesses.	MB: Require development within the Arnside Road District Centre to have active frontages.
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	0	0	0	I	P	Local	R: Cultural heritage; built environment; AG: Bristol's population.	n/a
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	-/?	-/?	-/?	I	P	Local; City-wide	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM: Conserve and enhance ecological networks and provide mitigation for any impacts on the Greystone Avenue Open Space Wildlife Corridor.
Transport	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	D	P	Local; City-wide	As above.	AM: Ensure replacement of high quality open space following loss of Glencoyne Square. MB: Reference to design guidance / exemplar designs in relation to GI; and any updated strategic GI strategy. MB: Consider provision of new youth provision and improvements to Doncaster Road Park.
	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local and City-wide	R: Public health; AG: Bristol's population.	AM: Set out the detail associated with improved pedestrian and cycle routes through Glencoyne Square and Arnside Road, which could help improve north – south accessibility within the GRA.
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	D	P	Local; City-wide	R: Bristol's highway network; public health; AG: Bristol's population.	n/a
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	0/?	0/?	0/?	Both	Both	Local	R: Natural environment (water); AG: Bristol's population; local wildlife.	CR: Retained Policy BCS16.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local; City-wide	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	MB: Suggest inclusion of new food growing space within GRA, to be provided in a coordinated way. CR: Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management.
	17. Minimise air and noise pollution	DMC38	+/?	+/?	+/?	I	Both	Local; City-wide.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	D	Both	Local; City-wide.	R: Natural environment (water); AG: Bristol's population; local wildlife.	n/a

Evaluation of Effects	<p>Scale of effects: The scale of effects of this draft policy would be predominantly attributable to the Growth and Regeneration Area and the specific sites within this broader area. Positive effects would be achieved for provision of homes, increasing participation in community activities, and encouraging investment in an area of high deprivation. However, this draft policy would likely have effects upon adjacent land and key receptors, for example: lack of provision of workspaces, loss of open space and potential impacts on ecological designations (the Greystone Avenue Open Space Wildlife Corridor) may impact efforts to reduce unemployment and increase public health.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This draft policy could have positive effects for housing delivery, and the quantum of ‘around 300 new homes’ is specified within policy text (DMC1). In absence of JSP policies for affordable housing or in-text references to appropriate levels of affordable housing, assessment of this policy against DMC2 is uncertain. Reference should be made to the appropriate percentage target of affordable housing provision (in accordance with BCS17, DM3 or equivalent) which should be informed by a proportionate assessment of viability at the plan-level. Cross-reference could be made to proposed policies for community-led housing and elderly care housing, and sites may be identified where there is sufficient evidence to do so (DMC4). • Place principles set out by the draft policy text include the requirement for development to make efficient use of land, in line with Urban Living principles and the Local Plan Development Strategy. With proposals required to be developed in a comprehensive/co-ordinated manner, it is considered that this draft policy could provide positive, yet unknown, effects for SA Objective 2 (DMC5). Around a fifth of the GRA is currently designated as Important Open Space, which is not proposed to be retained as Reserved Open Space or Local Green Space. Therefore, the effects of this Policy Option could also be potentially negative where Important Open Space (Glencoyne Square) is proposed for redevelopment or where infill development occurs on greenfield land (DMC5 and DMC7). Being sited within the Outer Urban Area, draft Policy UL2 requires proposals for residential development reflect 60dph as a minimum, which could generate some positive effects for DMC6. The effects are therefore complex: encouraging infill within an area of low density could achieve positive effects, however this may have uncertain effects for land which is currently greenfield. • There is some provision of services within the boundary of the GRA itself, including Community Centres (Southmead Community Centre and New Brunswick Reformed Church; noting the White Hall has recently closed), Southmead Library, Greystoke Avenue Post Office, and Arnside Road Pharmacies. The GRA overlaps with the Arnside Road (Southmead) District Centre (Objective 3 DMC8 and Objective 9), and Southmead Road Local Centre is within 800m walking distance. As a result, the draft policy text does not require the development of retail and leisure development, however it could instead require active frontages for development that takes place within the Centre boundary. Overall, the draft policy would deliver a positive, but not significant positive, effect when assessed against Objective 3 and Objective 9. • This draft policy is considered likely to produce positive effects for DMC9, as the policy text includes the requirement for the development of new community facilities and sets out a recommended location along Greystoke Avenue. However, the development of community facilities within this GRA is uncertain until development proposal stage. • It is considered that this draft policy has the potential to produce significant positive effects for SA Objective 5 (DMC10 and DMC11), as the GRA is located within the 10% most deprived areas (based upon 2019 IMD Data). Development and regeneration of this GRA therefore has the potential to transform the built environment through improved sustainable transport linkages, public realm improvements and offering opportunities for investment in local employment through the provision of workspace. Effects are also partly unknown and remain dependent site-specific proposals. • Effects associated with this Objective are complex. As the GRA includes several areas of Important Open Space which are not proposed to be retained within the Local Plan Review, there could be negative effects for health. Replacement or enhancement of existing spaces will be essential to maintaining or improving positive well-being and healthy lifestyles (DMC13). Separately, the area is not within an existing AQMA or Cumulative Impact Area, and therefore it is considered that future occupants/users of development within the GRA are unlikely to be subject to poor air quality (relative to the City Centre). Effects against this DMC are however unknown and related to factors including trip generation brought by any future development. • There is no educational provision within the GRA itself. However, there is a primary school adjacent to the western boundary (Little Mead Primary School) and a secondary school (Bristol Free School) which is within a 1km easy walking distance of the GRA. As such this draft policy is considered to generate positive effects for DMC16, with high levels of physical accessibility these facilities. • This draft policy makes no reference to the provision of high quality workspace (DMC17), therefore it is unclear whether the policy could have any effects supporting priority employment sectors (DMC18). In absence of a reference to the provision of workspaces, in an area with a high rate of unemployment, there could be a negative or uncertain effect on DMC19. It is uncertain the extent to which this draft policy would support delivery of carbon neutral employment space (DMC21). • A small percentage of the GRA (2%) overlaps with the Greystone Avenue Open Space Wildlife Corridor and an SSSI Impact Zone. As the draft policy does not reference the wildlife network site, there is a risk that proposals result in negative effects against SA Objective 11 in the absence of appropriate and proportionate ecological mitigation (DMC25). The delivery, scale and location of any net gain in biodiversity is subject to future development proposals and therefore remains uncertain (DMC26). • It remains unknown the extent to which development and regeneration of the GRA would include GI and public realm improvements under SA Objective 12 (DMC27), particularly with the with effects contingent upon detailed design of future development proposals. • The Growth and Regeneration Area is less well served by strategic transport provision when compared to other GRAs, with accessibility decreasing away from Greystoke Avenue. Bus services are only located around Greystoke Avenue (including the 2, 13, 75) which travel between Broadmead, Cribbs Causeway and the City Centre, and the Trowbridge Road cycle network. To encourage a modal shift and reduce the need to travel, the draft policy text requires development to provide improved pedestrian and cycle routes through Glencoyne Square and Arnside Road, public transport enhancements, enhanced connectivity with surrounding areas, cycle provision, pedestrian route improvements and local highway improvements. The Growth and Regeneration Area could have a positive effect on the ability to improve access to and quality of sustainable transport modes (DMC28). • The GRA boundary includes land within Flood Risk Zone 1, with approximately 4% of the GRA being located within areas of high surface water risk. While the exact location of new development within the GRA boundary is unknown, it is considered that the potential for effects of development for local flood risk is relatively low when appraised against SA Objective 15. The use of SUDS as set out by retained flood risk Policy BCS16 could provide appropriate mitigation for any adverse surface water flood risk at the site. • While the area is not adjacent to any groundwater protection zones, it is located within proximity to the River Trym / Badocks Brook, currently classified by the Environment Agency as ‘Poor’ or ‘Bad’ in status^{17,18}, effects against DMC34 are unknown overall. Moreover, the extent to which this draft policy would deliver a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production is unknown (DMC35, DMC36); this remains dependent upon the nature of detailed design proposals and compliance with other draft Local Plan policies in relation to climate change and sustainability. No reference is made to food growing, which could support community development, provision of outdoor space and better awareness of healthy food (DMC37). • As set out above, given the GRA is not located within an existing AQMA or Cumulative Impact Area, it is considered that this could ensure minimal exposure of new development to high levels of existing pollutants (DMC38); however, the effects of development are also partly unknown, and remain dependent upon the nature of development (use), alongside the availability and usage of sustainable and/or active travel modes for new development to limit the impact of vehicular emissions.
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¹⁷ List of Vulnerable Water Bodies- Avon Bristol Urban catchment: <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3046/classification?item=106&status=Poor&status=Fail&status=Bad>

¹⁸ Pinpoint data – river water quality 2013. <https://maps.bristol.gov.uk/pinpoint/>

Draft Policy IDC1: Assessing the Effects of Infrastructure and Developer Contributions Policies

Assessing the Effects of the Infrastructure and Developer Contributions Policies

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

The NPPF sets out national guidance in relation to planning conditions and obligations.

Paragraph 34 explains that plan-maker should set out the contributions expected from development within the plan. This should include setting out the level and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies are required not to undermine the deliverability of the Plan.

In relation to decision-taking, the NPPF requires that LPAs explore the use of planning conditions and obligations as follows:

- To consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations (para 54);
- Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition (para 54);
- Planning obligations should only be sought where they meet the tests prescribed, namely being:
 - *‘Necessary to make the development acceptable in planning terms;*
 - *Directly related to development; and*
 - *Fairly and reasonably related in scale and kind to the development’* (para 56)

The Planning Practice Guidance¹⁹ explains the difference between planning obligations, in the form of section 106 agreements and section 278 agreements, and Community Infrastructure Levy. The guidance requires that policies for planning obligations should be set out in plans and examined in public²⁰. Policy requirements should be clear and be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability. It is not appropriate for plan-makers to set out new formulaic approaches to planning obligations in supplementary planning documents or supporting evidence base documents, as these would not be subject to examination.

ODPM Circular 06/2005²¹ provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system. It addresses the conservation of internationally designated sites: Special Protection Areas (SPAs) classified under the EC Birds Directive, Special Areas of Conservation (SACs) designated under the EC Habitats Directive, and Ramsar sites listed under the provisions of the Ramsar convention⁴ on wetlands of international importance; Sites of Special Scientific Interest (SSSI); and nature conservation outside such designated sites.

The policy proposed under *‘Infrastructure and Developer Contributions’* of the Draft Local Plan is set out in The Lockleaze Area of Growth and Regeneration (GRA) is located within North Bristol, where the Draft Local Plan proposes a minimum of 6,000 new homes across the entire area in accordance with the Development Strategy. The area has experienced significant regeneration in recent years,

¹⁹ <https://www.gov.uk/guidance/planning-obligations>

²⁰ Planning Practice Guidance (2019) Paragraph: 004 Reference ID: 23b-004-20190901

²¹ <https://www.gov.uk/government/publications/biodiversity-and-geological-conservation-circular-06-2005>

including public realm improvements at Gainsborough Square and infill development on several small sites owned by BCC. It is considered that the existing dwelling density of Lockleaze is low, compared with other areas of the city, resulting in a limited population to support the existing centre at Gainsborough Square and public transport services.

Key baseline and sustainability issues associated with the GRA are defined as follows:

- The GRA is located within an area of high deprivation and is an area that has a high proportion of working-age population who are involuntarily unemployed.
- The area is not within an AQMA or cumulative impact zone.
- Almost one fifth of the GRA is made up of land that is currently designated as Important Open Space (including Rowlandson Gardens, Gainsborough Square, Ashley Down Allotments and Railway Land, Lockleaze Primary School, Dovercourt Road Allotments and Dovercourt Road Open Space). The vast majority of these are proposed to be retained as Reserved Open Spaces or Local Green Spaces within the Local Plan Review.
- The Morris Road Railway Cutting and Bonnington Walk SNCI are located within the GRA. The GRA overlaps with several wildlife corridors, including the Bonnington Walk Open Space, Railway Land areas, Lockleaze School playing field, Land around Dovercourt Depot, Land rear of Downman Road and Dovercourt Road Allotments and Open Space (amongst others).
- A small percentage of the site (approximately 3%) to the north of the site is located within the Stapleton and Frome Valley Conservation Area, and the GRA is bounded at the south by the Grade II Stoke Park Registered Park and Garden in the south west. There are no listed features within the GRA site boundary.
- The area is not well-connected to existing communities in south and west Bristol.
- Approximately 1% of the GRA is currently allotment land (Dovercourt Road Allotments).

The GRA boundary includes land within approximately 1% of Flood Risk Zone 3b and 2% within Flood Risk Zone 2.. The Draft Local Plan makes it clear that the main objective of Draft Policy IDC1: Development contributions and CIL policy is broadly to ensure that future development is supported by new and improved infrastructure such as schools, parks, transport facilities and health facilities.

The current situation is informed by the BCC Planning Obligations Supplementary Planning Document (2012)²², which sets out the Council's approach to planning obligations and procedural matters relating to the drafting and enforcement of Section 106 (S106) Agreements. The SPD also sets the types of obligation that the Council may seek to secure from development. The key adopted Local Plan Policy that would be replaced by the proposed new policy is BCS11 – Infrastructure and Developer Contributions.

At a national level, it is acknowledged that the planning reform proposals set out within the Planning for the Future White Paper²³ include a significant proposal to replace the Community Infrastructure Levy (CIL) and the current system of planning will be reformed as a nationally set, value-based flat rate charge (the 'Infrastructure Levy'). This could reform mechanisms through which developer

²² <https://www.bristol.gov.uk/documents/20182/34520/SPD%20Final%20Doc%20Dec2012.pdf/daf75908-50fd-4138-afed-770310a6a431>

²³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf

contributions are secured, however as these are not yet established as requirements for local authorities, these proposals are not explored further within the context of this Interim SA.

Currently, there are two mechanisms which local planning authorities may employ to secure developer contributions: CIL and planning obligations through S106 agreements.

Table 2 Relationship with other relevant plans and programmes

Draft Policy	NPPF	Other legislation or guidance	Retained Policies	Evidence
Draft Policy IDC1: Development contributions and CIL	Paras 54 - 57	Section 106 of the Town & Country Planning Act 1990, as amended by Section 12 of the 1991 Planning and Compensation Act. Community Infrastructure Levy (CIL) Regulations 2010, and the CIL (Amendment) Regulations 2019 ODPM Circular 06/2005 ²⁴	N/A	BCC Community Infrastructure Levy Charging Schedule (2012) ²⁵ Planning Obligations Supplementary Planning Document (2012) ²⁶

Stage 2 Identify, define and describe alternatives

Draft Policy IDC1: Development contributions and CIL

Option 1 No new policy in relation to development contributions and CIL

Given the change to the current situation and changes to the national policy context since the adoption of the last plan, a 'no policy option' is not considered a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to development contributions and CIL

This option would introduce policy for development contributions and CIL (the 'March 2019 Consultation Option') for consideration in development management of future planning applications.

It sets out that development and infrastructure provision will be coordinated to ensure that growth in the city is supported by the provision of infrastructure, services and facilities needed to maintain and improve quality of life and respond to the needs of the local economy.

It would include requirements for development proposals to provide, or contribute towards the provision of:

- Measures to directly mitigate its impact, either geographically or functionally, which will be secured through the use of planning obligations; and
- Infrastructure, facilities and services required to support growth, which will be secured through a Community Infrastructure Levy (CIL) for Bristol.

Furthermore, Draft Policy IDC1 sets out that planning obligations may be sought from any development, irrespective of size, that has an impact requiring mitigation. Contributions through CIL will be required in accordance with the appropriate regulations.

²⁴ <https://www.gov.uk/government/publications/biodiversity-and-geological-conservation-circular-06-2005>

²⁵ <https://www.bristol.gov.uk/documents/20182/33588/CIL+Charging+Schedule.pdf/2f70e1ce-1c68-41c7-a8ca-a77724926d4f>

²⁶ <https://www.bristol.gov.uk/documents/20182/34520/SPD%20Final%20Doc%20Dec2012.pdf/daf75908-50fd-4138-afed-770310a6a431>

The Draft Policy would be supported by the BCC Planning Obligations SPD, which sets out how the Council intend to secure developer contributions for the following areas: affordable housing; highway infrastructure works; Traffic Regulation Orders ; trees; fire hydrants; landscaping schemes; areas of public realm; removing barriers to employment; supporting Retail Centres; other site specific measures; and Travel Plans. The BCC CIL Charging Schedule (2012) would also set the application of CIL for decision-takers.

Reasonable Alternative	Yes
Rationale	<p>This option is integral to the ensuring the sustainable delivery of Bristol’s Development Strategy (including housing and employment growth) set out within the Local Plan, as it promotes the delivery of coordinated and proportionate levels of infrastructure, services and facilities required to keep pace with the city’s future development and economy.</p> <p>This option would be compliant with national policy requirements set out within the NPPF with regards to planning obligations and the policy ‘tests’ for the use of these (paras 54, 56).</p>
Recommendations for Evidence Update	<ul style="list-style-type: none"> • Planning Obligations SPD and Infrastructure Funding Statement and CIL Rate Summary. • Supporting Infrastructure Delivery Plan (including updated requirements for infrastructure types, such as the Parks and Green Spaces Strategy). • Establish updated planning requirements for the provision of affordable housing (now that Policy 3 of the West of England JSP has been withdrawn).

Stage 3 Assessment and Evaluation of Alternatives

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

There were no difficulties encountered in the identification of or assessment of alternatives for this Draft Policy.

Summary of assessment findings

Selected Approach for Draft Policy IDC1 – Option 1

This Policy Option would enable planning obligations to be sought from any development, irrespective of size, that has an impact requiring mitigation; and as such, would help minimise adverse effects of development. The absence of a development threshold for which obligations may be sought, may raise some concerns about development and plan viability. Delivery of infrastructure, services and facilities through CIL is considered to generate cumulative and synergistic positive benefits for several SA Objectives, and as such, this Option represents the Council's selected approach.

Grouped Policy Theme Recommendations

- Refresh Draft Policy IDC1 or and future revisions to this policy to ensure compliance with any new national guidance set following the final Planning for the Future White Paper.
- Reference the Council's updated Infrastructure Statement and the relevant CIL / Planning Obligation guidance (e.g. the SPD).

Draft Policy IDC1 Development contributions and CIL

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to development contributions and CIL							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	?	?	?	Both	Both	Local and City-Wide	R: Local housing market, Bristol's population; AG: Bristol's population.	AM: Provide updated requirements for planning obligations in relation to affordable housing. AM: As required by the Planning Practice Guidance, prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies (such as this one) is not of a scale that will make the plan (and ambitions to exceed 33,500 homes) undeliverable. AM: Provide requirements for delivery for all types of provision within draft policy, now that guidance indicates that this should not be within supporting evidence or SPDs. AM: Expand on definition / provide evidence for obligations being sought from 'any' development.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Bristol's local economy / local centres; AG: Local businesses.	CR: Draft and retained design policies. AM: Provide requirements for delivery for all types of provision within draft policy, now that PPG indicates that this should not be within supporting evidence or SPDs.
	4. Increase participation in cultural and community activities	DMC9	+/?	+/?	+/?	I	P	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	CR: Draft and retained design policies. AM: Provide requirements for delivery for all types of provision within draft policy, now that PPG indicates that this should not be within supporting evidence or SPDs.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	CR: Draft and retained design policies.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	CR: Requirement for mitigation under draft air quality policies. MB: Reference inclusive and accessible cycling for all users.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	+/?	+/?	+/?	I	P	Local and City-wide.	R: Bristol's local economy; AG: Bristol's population; educational facilities.	AM: Provide requirements for delivery for all types of provision within draft policy, now that PPG indicates that this should not be within supporting evidence or SPDs.
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	CR: Draft Policy E1.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local and City-wide.	As above.	AM: Provide requirements for delivery for all types of provision within draft policy, now that PPG indicates that this should not be within supporting evidence or SPDs.
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide.	R: Cultural heritage; built environment; AG: Bristol's population.	n/a
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	Both	Local and City-wide.	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM: Provide requirements for delivery for all types of provision within draft policy, now that PPG indicates that this should not be within supporting evidence or SPDs. AM: Make reference to strategic approach to mitigation for effects on statutory ecological sites.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+/?	+/?	+/?	D	Both	Local and City-wide.	As above.	MB: Reference inclusive, high-quality streetscape design that maximises benefits for GI and active travel. AM: Provide requirements for delivery for all types of provision within draft policy, now that PPG indicates that this should not be within supporting evidence or SPDs.
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	D	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	AM: Provide requirements for delivery for all types of provision within draft policy, now that PPG indicates that this should not be within supporting evidence or SPDs.
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	D	Both	Local and City-wide.	R: Bristol's local and strategic highway network. AG: Bristol's population.	AM: Avoidance of adverse impacts by new development on existing highway and local provision. AM: Provide requirements for delivery for all types of provision within draft policy, now that PPG indicates that this should not be within supporting evidence or SPDs.
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	+/?	+/?	+/?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	AM: Provide requirements for delivery for all types of provision within draft policy, now that PPG indicates that this should not be within supporting evidence or SPDs.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	n/a
	17. Minimise air and noise pollution	DMC38	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Requirement for mitigation under draft air quality policies.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Reference inclusive, high-quality streetscape design that maximises benefits for GI and climate resilience. AM: Provide requirements for delivery for all types of provision within draft policy, now that PPG indicates that this should not be within supporting evidence or SPDs.

<p>Evaluation of Effects</p>	<p>Rank Score: 1 – This Policy Option would set out provisions in respect of infrastructure and developer contributions, including educational facilities, green infrastructure, transport infrastructure and health facilities. This policy aims to ensure that the delivery of such provision is carried out in a coordinated manner so that growth in the city is supported by the provision of infrastructure, services and facilities needed to maintain and improve both the populations’ quality of life and the local economy. Planning obligations may be sought from any development, irrespective of size, that has an impact requiring mitigation. Contributions through CIL will be required in accordance with the appropriate regulations.</p> <p>Scale of effects: The scale of effects would be at the site / application level and dependent upon the nature of specific infrastructure delivered. This policy could however have local and city-wide cumulative effects where the policy principles are implemented across the city such as where strategic cycleways are enhanced/developed to span local neighbourhoods.</p> <p>Social, economic and environmental effects: Due to the encompassing nature of the Policy Option, it has potential to offer numerous positive effects across the SA Objectives, particularly within key areas of education, transport, services and green infrastructure or flood resilience.</p> <ul style="list-style-type: none"> • In relation to Objective 2 (DMC2), it is currently uncertain of the extent to which this draft policy would ensure adequate contribution to affordable housing. The policy basis for requiring affordable housing provision was previously set out within Policy 3 of the West of England Joint Spatial Plan; and therefore this will require an update through any replacement strategic plans. • For SA Objectives 3, 4 7, and 9, sustainability effects are considered to be comparable (minor positive), as the draft policy promotes the delivery of infrastructure, facilities and services required to support economic growth and meet the requirements of future development being delivered across the city. However, clearly effects will also be unknown, being dependent upon the scale and design of infrastructure delivered, its interface with other related infrastructure and who is able to benefit from it. • This option could trigger regeneration or investment in deprived areas; and could indirectly support the connectivity of population to employment and/or education opportunities, services and other community facilities (e.g. through delivery of digital or transport infrastructure). Effects of this policy option against SA Objective 5 are considered to be minor positive where development and infrastructure contributions are proposed within areas of deprivation, however this is unknown at this stage. • Through provision of green spaces/green infrastructure and/or footpaths and cycleways, or indeed health and education infrastructure, it is considered that this draft policy option could benefit public health and reduce health inequalities; however, effects are also unknown and dependent upon the siting, design and scale of such infrastructure, including its interface with any surrounding development (DMC13 and DMC14). The Policy Option is considered to have potential to produce mixed, unknown effects with regards to improving air quality (DMC12), as the introduction of active travel infrastructure could reduce emissions while development of the local or strategic road network may create the opposing effect. The extent of improvements to local air quality brought through this policy is also contingent upon the existing baseline (i.e. whether proposed within an AQMA or cumulative impact zone). • Effects against Objective 8 are likely to also be positive, but uncertain. The SPD sets out how contributions should ‘remove barriers to employment’; a principle which is reflected now within draft policy E1. • The effects of this option against SA Objectives 10 and 11 are considered to be unknown and guided through other development policies (i.e. BCS22, DM31, BCS9 and DM19). Proposals for new development may have effects on the historic and/or natural environment if these do not sympathetically respond to either the historic and/or landscape character or setting; or, account for biological or geological value. In addition, as opportunities to maximise GI are not referenced within the design of car and cycle provision, effects are also unknown in terms of GI enhancement. • Similar to SA Objectives 3, 4 7, and 9, this Policy Option could generate positive effects for SA Objectives 12, 13, 14 and 15, where it enables the delivery of green or blue infrastructure (DMC27); new transport or digital infrastructure (DMC28, DMC29); or flood resilience infrastructure (DMC 32 and DMC33). Effects against each of these SA Objectives are also unknown, again, being dependent upon the scale and design of infrastructure delivered, its interface with other related infrastructure and who is able to benefit from it. • Against SA Objectives 16 and 18, effects of this option are unknown, as infrastructure delivered in conjunction with development proposals may have impacts on local and/or city-wide water resources, however, this is more closely linked to the intensification of land use, the type and design of development, and the resilience of water supply across the Plan period. Whilst other development policies support the principle of high-quality design, the standard of sustainable design, energy efficiency and construction are unknown as it is directed by other draft policies. • This option could generate minor negative indirect effects for air quality (SA Objective 17) through construction and operation stages of infrastructure, depending on the scale and nature of such development and subject to any offsetting. However, overall effects of this policy option are unknown and dependent upon the end use and level of accessibility by active travel (i.e. walking and cycling) and sustainable public transport, alongside site-specific and design considerations.
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Draft Policies UL1 and 2: Assessing the Effects of the Urban Living Policies

Urban Living

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

At a national level, paragraphs 122 -123 of the revised NPPF set out how Local Planning Authorities should use minimum density standards for city and town centres to maximise the efficient use of land and boost housing supply. Updated PPG²⁷ also outlines new requirements for higher density development and considerations when establishing 'appropriate densities', including a range of densities across different spatial locations.

In addition, the 'Planning for the Future' White Paper, includes objectives to increase the delivery of homes and densification. It is evident that the agenda for efficient land use particularly for housing development will be expected to be carried through within local development planning policy.

Moreover, to address national housing supply shortages, a recent update to the Town and Country Planning Regulations 2020²⁸ confirms that from 1 August 2020 certain existing, purpose-built, detached blocks of flats will be extended upwards to provide additional homes without the need for planning permission.

The Draft Local Plan March 2019 Consultation version includes an overarching objective to deliver a minimum of 33,500 homes in Bristol by 2036, including affordable housing and homes to meet a range of needs, whilst aiming to exceed this target where new infrastructure can unlock additional potential. The development of Urban Living policies, which focus on effective land use through intensification in sustainable locations, is therefore required to support the strategic delivery of housing across the Plan area, for which reasonable alternatives are discussed in Section 5 of the main report.

Based on the SA Scoping Report 2018 and March 2020 Baseline Update, key current sustainability issues within Bristol are identified as:

- Above average population growth when compared to national statistics, plus a high demand for new housing;
- Limited housing supply to meet current and projected future demand within the city;
- Increasing population density, particularly within the city centre; and
- Above average increase in house prices and poor affordability levels when benchmarked against national rates.

Policies under '*Urban Living*' of the Draft Local Plan are set out in The Lockleaze Area of Growth and Regeneration (GRA) is located within North Bristol, where the Draft Local Plan proposes a minimum of 6,000 new homes across the entire area in accordance with the Development Strategy. The area has experienced significant regeneration in recent years, including public realm improvements at Gainsborough Square and infill development on several small sites owned by BCC. It is considered that the existing dwelling density of Lockleaze is low, compared with other areas of the city, resulting in a limited population to support the existing centre at Gainsborough Square and public transport services.

²⁷ Paragraph: 004 Reference ID: 66-004-20190722

²⁸ The Town and Country Planning (Permitted Development and Miscellaneous Amendments) (England) (Coronavirus) Regulations 2020

Key baseline and sustainability issues associated with the GRA are defined as follows:

- The GRA is located within an area of high deprivation and is an area that has a high proportion of working-age population who are involuntarily unemployed.
- The area is not within an AQMA or cumulative impact zone.
- Almost one fifth of the GRA is made up of land that is currently designated as Important Open Space (including Rowlandson Gardens, Gainsborough Square, Ashley Down Allotments and Railway Land, Lockleaze Primary School, Dovercourt Road Allotments and Dovercourt Road Open Space). The vast majority of these are proposed to be retained as Reserved Open Spaces or Local Green Spaces within the Local Plan Review.
- The Morris Road Railway Cutting and Bonnington Walk SNCI are located within the GRA. The GRA overlaps with several wildlife corridors, including the Bonnington Walk Open Space, Railway Land areas, Lockleaze School playing field, Land around Dovercourt Depot, Land rear of Downman Road and Dovercourt Road Allotments and Open Space (amongst others).
- A small percentage of the site (approximately 3%) to the north of the site is located within the Stapleton and Frome Valley Conservation Area, and the GRA is bounded at the south by the Grade II Stoke Park Registered Park and Garden in the south west. There are no listed features within the GRA site boundary.
- The area is not well-connected to existing communities in south and west Bristol.
- Approximately 1% of the GRA is currently allotment land (Dovercourt Road Allotments).

The GRA boundary includes land within approximately 1% of Flood Risk Zone 3b and 2% within Flood Risk Zone 2.. The grouped policies under this theme seek to directly meet the requirements of the following Local Plan Objective to *‘Promote urban living across the city with a focus on brownfield land – encouraging developments of homes with urban character form and design in well-designed, connected, healthy and accessible neighbourhood which achieve a liveable environment’*. The Draft Local Plan makes it clear that the rationale for the introduction of new Urban Living policies are broadly as follows:

- Ensure the strategic delivery of new homes across the Plan period;
- Optimise density of new and existing development; and
- Balance the efficient and effective use of land with aspirations for high quality design and successful placemaking.

The current situation is informed by proposals to retain Policy BCAP34, which set the Local Plan’s approach to major development proposals within the area defined as the City Centre. This retained policy would therefore inform the implementation of Draft Policies UL1 and UL2, where future proposals relate to the City Centre. The adopted supplementary planning document on Urban Living (*‘Urban Living: Making Successful Places at Higher Densities’²⁹*) also provides guidance to the implementation of draft policies within this theme.

In the Draft Local Plan, new proposed policies would replace existing Policy BCS20 Effective and Efficient Use of Land (within the Core Strategy), while retaining the minimum indicative net density of 50 dwellings per hectare for residential development. These would also set a requirement for

²⁹<https://www.bristol.gov.uk/documents/20182/34520/Urban+Living+SPD+Making+successful+places+at+higher+densities.pdf>

development proposals to develop land to its optimum density, use land efficiently and specify locations with suggested densities for more intensive forms of development. Through specifying minimum development densities for different urban areas, new policies would interrelate with the Areas of Growth and Regeneration set out within the Development Strategy of the Local Plan (Draft Policies DS1-14 of the March 2019 Consultation Version).

Whilst the exact quantum of housing development required may be subject to change in light of the emerging Spatial Development Strategy, this set of policies seek to introduce the principle of ‘Urban Living’ within the new Local Plan.

Table 3 Relationship with other relevant plans and programmes

Draft Policy	NPPF	Other legislation	Retained Policies	Evidence
Draft Policy UL1: Effective and efficient use of land	Paras 122, 123	n/a	<ul style="list-style-type: none"> Retained Policy BCAP34: Coordinating major development in Bristol City Centre Retained Policy BCS21 Quality Urban Design 	West of England Joint Spatial Plan Bristol Local Plan Review Urban Potential Assessment (2018).
Draft Policy UL2: Residential densities		n/a	<ul style="list-style-type: none"> Retained Policy DM27 Layout and Form Retained Policy DM28 Public Realm Retained Policy DM29 Design of New Buildings Retained Policy DM30 Alterations to Existing Buildings Retained Policy DM31 Heritage Assets Retained Policy DM32 Recycling and Refuse Provision in New Development 	Wider Bristol Area Strategic Housing Market Assessment (SHMA) 2018. Urban Living: Evidence Base (2018).

Stage 2 Identify and describe realistic alternatives

The ‘current situation’ has changed since adoption of the current Local Plan: specifically, there was a need to ensure conformity with the housing target within the withdrawn JSP and there remains an ongoing requirement to reflect the national emphasis on brownfield development and efficient use of land set out within the revised NPPF and updated PPG. In addition, the Urban Potential Assessment (2018) for Bristol indicates that there is a need to introduce policy that would guide sustainable delivery of housing following capacity analysis that suggests significant potential for residential development derived from urban potential sites.

“Policy off” alternatives, which would result in a reliance upon existing adopted Core Strategy / BCAP policy approaches (detailed within Policy BCS20 of the Core Strategy and Policy BCAP2 of the BCAP), are therefore not considered to be reasonable alternative policy options in this instance.

Draft Policy UL1: Effective and efficient use of land

Option 1 No new policy in relation to effective and efficient use of land

Given the change to the current situation, including the elevated housing target for the Local Plan period, this is not considered a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to effective and efficient use of land

This option would involve the introduction of new policy (‘March 2019 Consultation Option’) that would set out expectations for new development proposals to make efficient use of land and include

a presumption against development that fails to meet such criteria. Development will be expected to:

- To reflect Bristol’s urban character, by maximising opportunities to re-use previously developed land and deliver high quality well-designed environments at higher densities (informed by Draft Policy DC1 with regards to liveability standards, which is based on new technical standards for internal space);
- Develop land to its optimum density through introduction of new design types, consideration of scale and form; and the development of mixed-uses within buildings and development sites;
- Make efficient use of land including, where appropriate, development of under-used land and buildings and/or vertical extension of buildings by using existing airspace above.

This option would also introduce locations where more intensive forms of development would be both suitable and expected (Diagram 6.1 of the Draft Local Plan March 2019 Consultation version), including the city centre, Bristol Temple Quarter and St. Philip’s Marsh; sites within or close to town and district centres; and sites close to major public transport routes and corridors. This list of appropriate locations is extended to Areas of Growth and Regeneration.

This approach is based upon guidance set out within updated PPG³⁰, which sets out guidance for implementing a graded approach to development densities within a Local Plan. This include exploring: accessibility measures; characterisation studies and design strategies; environmental and infrastructure assessments and market assessments/viability.

Under this option, accessibility measures are used to define sustainable locations for intensification. ‘Close to’ is interpreted within policy as being within an average 5 minutes’ walk (approx. 400m). Major public transport routes and corridors include railway stations, rapid transit stops (including MetroBus) and major bus routes that are operating now or are expected to become active in a reasonable period of time.

Reasonable Alternative	Yes
Rationale	By requiring new development, including residential, to balance efficient use of land with liveability considerations and Bristol’s prevailing urban character, this policy option would align with the provisions of the NPPF in relation to achieving appropriate densities within development (paras 122 and 123). As the evidence used to identify this option considers local market conditions this option is also considered compliant with respect to para 122 (b) of the NPPF and updated PPG.
Recommendations for Evidence Update	<ul style="list-style-type: none"> • Refresh background evidence used to support the Urban Potential Assessment. • Undertake a viability appraisal for locations requiring more intensive forms of development, where applicable.

Other alternatives could consider different distances and/or thresholds to define different urban locations. Evidence will be needed to justify these thresholds before testing of reasonable alternatives is undertaken.

Draft Policy UL2: Residential densities

³⁰ Paragraph: 004 Reference ID: 66-004-20190722.

Option 1 No new policy in relation to residential densities within the Local Plan

Given the change to the current situation, including ambitions to ‘exceed’ the housing target for the Local Plan period and pressure on city centre land to meet the needs of commercial and residential space, this is not considered a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to residential densities within the Local Plan

This option (‘March 2019 Consultation Option’) would introduce minimum suggested densities for development proposals by area, while maintaining the current minimum net density of 50 dwellings per hectare for residential development (as set out within existing Policy BCS20 of the Core Strategy) within an area defined as the ‘outer urban area’.

Suggested minimum densities per hectare by area are set out within Table 6.2 of the Draft Local Plan March 2019 Consultation version, to include general and more intensive thresholds for the city centre, inner urban area and outer urban area. In accordance with updated PPG, these areas have been defined by accessibility criteria based on the latest available evidence.

Under this option, higher net densities within major residential development (minimum 10 dwellings) would be sought in areas specified within Draft Policy UL1. This option would include provisions that would permit development below minimum densities specified in discrete circumstances, as follows:

- It is essential to respect the character of the locality or protect the character and setting of heritage assets;
- Where a proposal includes house types which result in densities below the minimum but would otherwise make a significant contribution to the creation of mixed and balanced communities; or
- Where market signals, local housing market trends and local housing needs demonstrate that higher density forms of development are not viable.

The implementation of this policy option would be supported by Draft Policy DC1 ‘Liveability in residential development including space standards’ and the group of design policies (Draft Policies DC2-DC3 and Retained Policies BCS21 and DM27-DM32). For Areas of Growth and Regeneration, the density and quantum of development proposed would be guided by specific policy approaches applied to each respective area.

Reasonable Alternative	Yes
Rationale	By setting out minimum net density of residential development alongside a scaled, radial approach with greater densities applied to more central urban areas, this option would align with the revised NPPF (paras 122 and 123), which requires Local Planning Authorities to use minimum density standards for city and town centres to maximise the efficient use of land.
Recommendations for Evidence Update	<ul style="list-style-type: none"> • Refresh background evidence used to support the Urban Potential Assessment. • Set out densities within each of the Growth and Regeneration Areas within this policy.

Stage 3 Assessment and evaluation of effects

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

In terms of difficulties encountered in identifying reasonable alternatives of policies under this theme, the following specific issues were considered:

- Reasonable alternatives for policies under the Urban Living theme are directed by the Local Plan's Development Strategy, and as such are guided by reasonable alternatives for housing identified in the Strategic Reasonable Alternatives Section 5 of the main Interim SA report.
- There is limited supporting evidence at this stage of the Plan, which explores the effects of higher densities on townscape, transport and modal shift, wellbeing and public health, and flood risk. As the evidence base informing the plan evolves, effects should be updated.

Summary of assessment findings

Selected Approach for UL1 Policy - Option 2

Under Option 1 the 'no policy option', higher density forms of development would continue to be supported by existing policies, where opportunities for increased density would be sought in and around the city centre; in or close to other centres; and along or close to main public transport routes (BCS20); and promoted at 'accessible centres' for local services (BCS7), however minimum densities across the urban area would not be defined.

Policy Option 2 would introduce the Local Plan's approach to Urban Living and outline the principles that new development would be required to conform with, including developing land to its optimum density and an increased level of land-efficiency. By setting out specific locations where more intensive forms of development would be expected and supported, this Option would guide development towards more sustainable locations (i.e. those with the highest level of accessibility by active travel and/or public transport routes) and would ensure that greenfield land elsewhere within the city is protected where possible. It is considered that this Option would best facilitate the delivery of the Local Plan's Development Strategy, and as such represents BCC's Selected Approach.

Selected Approach for UL2 Policy – Option 2

By setting out clear 'general' and 'more intensive' thresholds for residential development graded by location, and including indicative boundaries for city centre, inner and outer urban areas, this option would improve upon the current situation by establishing appropriate density levels of residential development across the city.

With minimum net densities sought by areas specified within the policy, it is likely that this Option would direct denser and more land-efficient residential growth towards more sustainable locations and therefore be in alignment with the Local Plan's Development Strategy. This Policy Option is considered to be linked and important to the implementation of UL1 with respect to residential development, and therefore comprises BCC's Selected Approach.

Grouped Policy Theme Recommendations

- Both UL1 and UL2 should make cross-references to policies which would seek to balance the need for density and the need mitigate the effects of higher densities. For example, reference should be made to ensuring sufficient open space, infrastructure and healthy living conditions.

- Consider the effects of other draft policies on average densities (for example, Policy E7 New workspace within mixed use development and Policy H5).
- Both policies should balance the drive for efficient use of land and intensive development with the need to protect the city's green space and biodiversity, and effect on townscape.
- 'Urban Living' allocations require lower car ownership to be effective. Therefore, it is recommended that policies include specific provisions or are linked to guidance in relation to parking.

Draft Policy UL1 Effective and efficient use of land

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to effective and efficient use of land						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	+/?	+/?	+/?	D	P	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	n/a
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	++	++	++	D	P	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	n/a
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	I	P	Local	R: Bristol's local economy; Bristol's transport network; AG: Local services; Bristol's population.	CR: Developer contribution policies.
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	D	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	CR: Retained and draft policies relating to high-quality design. Maintain reference to Areas of Growth and Regeneration.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	I	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	CR: Draft policies addressing air quality within new development. AM: Presumption against design / density that would create adverse impact on health and well-being.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	?	?	?	I	P	Local and City-wide.	R: Bristol's local economy; AG: Bristol's population; educational facilities.	CR: Developer contribution policies.
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	D	P	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	CR: Protection of existing strategic employment opportunities, office development, new workspace within mixed use development and Industry and Distribution Areas (IDAs) is directed by other draft Local Plan policies and guided by the employment strategy. MB: Reference to employment uses in the context of achieving efficient use of land, in alignment with paragraphs 117 – 123 of the NPPF. MB: Policy should make reference to appropriate densities for mixed uses (e.g. employment, including priority sectors).
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local and City-wide.	As above.	MB: Include reference to provision of retail facilities / services and/or supporting town, district and local centres as part of mixed-use development, in alignment with paragraphs 117-123 of the NPPF.
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide.	R: Cultural heritage; built environment; AG: Bristol's population.	CR: Existing and draft design and conservation policies, particularly including reference to good practice examples of higher density development (i.e. through reference to the Urban Living SPD).
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	Both	Local and City-wide.	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM/MB: Provision of biodiversity net gain in line with proposed policies and any GI guidance. AM: Ensure statutory and non-statutory ecological assets are conserved and enhanced.
Transport	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	I	Both	Local and City-wide.	As above.	CR: New Protection for Open Space and local green space policies.
	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	n/a
Climate, Energy and Waste	14. To maintain and improve the existing highway network	DMC30 DMC31	?	?	?	I	Both	Local; City-wide; Trans-boundary.	As above, plus R: Bristol's highway network.	n/a
	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	CR: Retained policies for flood risk and water management.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	CR: Climate change and health and well-being policies.
	17. Minimise air and noise pollution	DMC38	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: As above.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: As above.

Evaluation of Effects and Rank	<p>Rank Score: 1 – This Policy Option would form the Local Plan’s approach to the efficient use of land in terms of density and under-used land; and would set out guidance relating to sustainable locations to which more intensive development would be expected to be sited in the future.</p> <p>Scale of effects: The scale of effects would be site specific, local and city-wide. With more intensive development directed towards Bristol City Centre, Bristol Temple Quarter and St. Philip’s Marsh, alongside areas defined as Areas of Growth and Regeneration, this policy option would generate direct and concentrated effects in these locations, with cumulative effects experienced in the immediate and wider area in terms of visual and transport impacts, amongst others. As the option encourages efficient use of land across the city, this option is likely to generate synergistic and cumulative effects across the Plan Area, particularly in combination with other Housing and Employment policies.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This option could generate minor positive effects for SA Objective 1 through promoting Urban Living principles as a means to achieving a higher quantum of housing across the Plan Area. However, effects against this SA Objective are also partly unknown, particularly for: the delivery of affordable housing, the mix of housing types or methods of delivery, which would be dependent upon development proposals, including design and viability considerations. • As the core component of this option is to drive efficient use of land, this option is likely to generate significant positive benefits for SA Objective 2. By including the requirement for new development to maximise opportunities to re-use previously developed land and deliver higher density development, including more intensive forms in suitable and sustainable locations, this option could result in optimal use of brownfield land across the city. The presumption contained within the policy against developments which fail to make efficient use of land is also considered to reinforce the policy and thereby strengthen the potential for beneficial effects against this SA Objective. • This option could generate minor, indirect positive effects for SA Objective 3, as the policy defines suitable sites as those within or close to the city’s town and district which are likely to have a concentrated proportion of services or facilities. It is reasonable to consider that major development proposals could also enhance existing or provide further service development where this is evidenced, and where s106 or CIL funding includes requirements for such provisions. However, effects are partly unknown against this Objective and based on the scale and siting of proposals, amongst other considerations. • As this policy would include a requirement for development to deliver high quality and well-designed environments while maximising density, it is reasonable to consider that this option could generate direct minor positive effects for SA Objective 5. This option could support improvements to the built environment within Areas of Growth and Regeneration as well as town and district centres located in deprived areas. However, as the extent of improvement and/or regeneration is linked to scale and relies upon compliance with other relevant design policies, the effects of this option are partly unknown. • This option is considered to generate unknown indirect effects for SA Objective 6, as the policy contains general provisions to deliver high quality environments. This could enable contribution to positive well-being of future occupants through well-designed living conditions, however, this is specifically addressed by other draft policies within the Local Plan (Design and Conservation theme). By directing development towards locations considered most sustainable (i.e. well-connected to sustainable modes of transport and/or ‘walkable’ from the City Centre), the air quality baseline and associated health outcomes may improve when compared to the absence of such policy within the Local Plan. However, effects of this option are considered unknown overall, being dependent upon factors such as existing air quality, development siting with respect to sustainable modes of transport, and components of design proposals including car-dependency. • Similar to effects for SA Objective 1, this option could create minor positive effects for SA Objective 8 where Urban Living principles support development of mixed uses within buildings and on development sites. By directing more intensive development towards more sustainable locations it is also possible that there may be a reduced need to travel for employment opportunities as these would be in closer proximity to existing and/or proposed residential development. However, as the policy does not reference employment uses / sectors, the extent to which it supports employment sectors identified as ‘priority’ (within the Local Industrial Strategy) is unknown and dependent upon multiple factors associated with policy implementation of this and other policies. Moreover, it is unknown the extent to which this policy would favour residential over employment development or facilitate a balanced delivery of both uses, and therefore its effects cannot be identified in absolute terms. The protection of existing strategic employment opportunities is directed by other draft Local Plan policies and guided by the employment strategy. • The option could generate minor positive effects for SA Objective 9 where the policy includes provisions for development of mixed uses within or close to the city centre, town and district centres. By requiring more intensive development to be sited in such locations, this option could enhance local retail centres both in terms of their viability, where residential and commercial development could generate footfall and multiplier effects for the local economy to support existing or proposed retail development; and vitality, where mixed use development includes additional retail spaces that would seek to diversity existing centres. However, effects of this option are also unknown given site-specific and design proposal dependencies, alongside the future resilience of retail uses within centres. • The effects of this option against SA Objectives 10, 11 and 12 are considered to be unknown. Whilst this policy does not directly influence the protection and enhancement of the historic and/or natural environment, proposals for higher densities may be more likely to have effects on the historic and / or natural environment if these do not sympathetically respond to either the historic and / or landscape character or setting; or, do not conserve or enhance the nature environment. Whilst retained policies are in place to minimise impacts on sensitive ecological or historical receptors (i.e. BCS22, DM31, BCS9 and DM19), the effects are therefore currently unknown and are dependent on design proposals, site-specific considerations and the degree of mitigation proposed. • By directing more intensive development towards more sustainable locations of the city, including those close to major public transport routes and corridors, it is likely that this policy option could have minor indirect positive effects for SA Objective 13 and 14 where it encourages more sustainable travel patterns (i.e. active travel) including through reducing distances between employment and residential development, and intensifying development such that it is concentrated at key sustainable transport nodes. However, as the policy does not directly seek to improve access to sustainable transport modes or support delivery of new transport infrastructure, and transport improvements through developer contributions would be subject to implementation, effects are also partly unknown. • Effects of this option for SA Objective 15 are unknown as they remain dependent on the level of flood risk experienced at the site and surrounds, in addition to flood risk projections based on the latest future climate change scenarios; alongside the design and type of development / intensity of land use. It is assumed that site selection for development proposals would follow the Sequential Test to direct development away from areas of highest flood risk, which would be guided by retained policies BCS16 and BCAP5. • Against SA Objectives 16 and 18, effects of this option are unknown, as development proposals may have impacts on local and/or city-wide water resources, however, this is linked to the intensification of land use, the type and design of development, and the resilience of water supply across the Plan period. Whilst this policy supports the principle of high-quality design, the standard of sustainable design, energy efficiency and construction are unknown as it is directed by other draft policies; and may not be consistently applied across a site or building level due to factors such as viability or site constraints. • This option could generate minor negative indirect effects for air quality (SA Objective 17) through construction and operation stages. However, overall effects are unknown and dependent upon the end use and level of accessibility by active travel (i.e. walking and cycling) and fuel type utilised by public and private transport (i.e. electric or hydrogen), alongside site specific and design considerations. Tall buildings may have elevated localised impacts where they cause turbulent air flows and affect air pollution dispersal. It is considered potential negative effects could be sufficiently mitigated where this option is introduced in combination with proposed Health and Well-being Policies and Climate Change and Sustainability Policies.
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Draft Policy UL2 Residential densities

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to residential densities within the Local Plan							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/- / ?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	+/?	+/?	+/?	Both	P	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	AM: Define what constitutes a 'significant contribution to the creation of mixed and balanced communities' which would allow lower densities to be accepted. AM: Set out appropriate evidence: 'where market signals, local housing market trends and local housing needs demonstrate that higher density forms of development are not viable'.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	++/?	++/?	++/?	D	P	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	AM: Provide greater definition of 'suitable sites'. AM: Provide guidance in relation to conversion of office buildings to residential uses (B1 to C2-C4 Use Classes) and clarify whether density thresholds would apply to such development. MB: Reference exemplar designs of development proposals that accord with Urban Living principles, as set out within the Urban Living SPD.
Health and Inequalities	3. Ensure easy and affordable access to key services	DMC8	?	?	?	I	P	Local	R: Bristol's local economy; AG: Local services; Bristol's population.	CR: Developer contribution policies, Infrastructure Statement and Infrastructure Delivery Plan.
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	D	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	CR: Retained and draft policies relating to high-quality design. Maintain reference to Areas of Growth and Regeneration.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	I	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	CR: Maintain reference to draft policy in relation to liveability in residential development. MB: Suggest integration of higher density proposals with existing local green space designated sites and/or inclusion of new open space. Include accessibility thresholds of suitable sites within policy itself. AM: Presumption against design / density that would create adverse impact on health and well-being.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	?	?	?	I	P	Local and City-wide.	R: Bristol's local economy; AG: Bristol's population; educational facilities.	CR: Developer contribution policies, Infrastructure Statement and Infrastructure Delivery Plan.
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	I	Both	Local and City-wide.	R: Bristol's local economy; Bristol's population; AG: Local businesses.	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide.	R: Cultural heritage; built environment; AG: Bristol's population.	CR: Include reference to existing and draft design and conservation policies. AM: Provide addition definition of qualifying criteria for 'necessary to safeguard the special interest and character of the area' or 'essential to respect the character of the locality or protect the character and setting of heritage asset'.
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	Both	Local and City-wide.	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM/MB: Provision of biodiversity net gain in line with proposed policies and any GI guidance. AM: Include provision that density below the minimum may be acceptable where it would protect the character / setting of biodiversity or geodiversity assets.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	I	Both	Local and City-wide.	As above.	CR: Reference New Protection for Open Space and local green space policies.
	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	n/a
	14. To maintain and improve the existing highway network	DMC30 DMC31	?	?	?	I	Both	Local; City-wide; Trans-boundary.	As above, plus R: Bristol's highway network.	n/a
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	CR: Retained policies for flood risk and water management.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	CR: Climate change and health and well-being policies.
	17. Minimise air and noise pollution	DMC38	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: As above.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: As above.

Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would introduce minimum suggested densities for development proposals by area, while maintaining the current minimum net density of 50 dwellings per hectare for residential development (as set out within existing Policy BCS20 of the Core Strategy) within an area defined as the ‘outer urban area’. Under this option, higher net densities within major residential development (minimum 10 dwellings) would be sought in areas specified within Draft Policy UL1; for which the suitability of sites would be considered on a case-by-case and contextual basis. Proposals below the minimum density thresholds would only be permitted in specific circumstances.</p> <p>Scale of effects: The scale of effects would be predominantly localised and attributable to the individual site level and adjacent receptors. However, effects would also be cumulative across the city where residential development is maximised within the Plan period.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This option could both indirectly and directly create minor positive direct effects for SA Objective 1 by requiring minimum densities for delivering of homes across the City which will support the ability to meet and exceed the target of 33,00 homes (DMC2). In addition, the policy allowed for densities below the suggested minimum may be acceptable where proposals would ‘otherwise make a significant contribution to the creation of mixed and balanced communities’ (DMC4) or where market signals / trends indicate that higher densities are not possible (DMC4). • Requiring development to consider optimum densities and directing greater density towards the city centre and inner urban areas, would function to encourage brownfield land to be used most efficiently in more sustainable areas of the city (DMC5, DMC6). Effects are uncertain, as higher densities will only be expected on ‘suitable sites’ and subject to a number of qualifying criteria. • Major residential development could enable indirect local improvements to key services, social infrastructure and local centres through the benefits of density on the vitality of areas, and through the impact of concentrations of developer contributions on areas experiencing higher densities. However, effects would be uncertain: not only would these be subject to implementation; but density should also be balanced against the capacity of existing infrastructure to support levels of growth. Effects of this option for SA Objectives 3, 7 and 9 are unknown. • Where residential development is proposed within areas of existing deprivation, this option could create indirect minor positive effects for SA Objective 5, as there could be potential for regeneration or further investment in such areas. However, effects are also unknown as the extent to which the built environment is improved is dependent upon the design of development delivered. • By linking the policy to liveability and design standards and accessibility to services and facilities, it is considered that this option could ensure good living conditions within new residential development, to contribute to a positive well-being of future occupants and therefore produce minor positive effects for SA Objective 6. However, effects of this option against SA Objective 6 are unknown overall, being dependent on design, alongside public health considerations such as siting with respect to open space, healthy food environments and level of existing air quality. • Similar to the effects of UL1 above, by directing development towards locations considered most sustainable it is reasonable to consider that the air quality baseline and therefore health outcomes may improve compared to the absence of such policy within the Local Plan. However, effects of this option against SA Objective 17 are considered unknown overall, being dependent upon existing air quality, development siting with respect to sustainable modes of transport, and components of design proposals including car-dependency. • This option is considered to produce the same potential effects for SA Objectives 10 – 18 as Draft Policy UL1 Option 2, as set out above, and as such are not repeated here.
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Draft Policies H1 – H10: Assessment of effects of draft housing policies

Assessing the Effects of the Draft Housing Policies

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

Section 5 of the Interim Sustainability Appraisal Main Report considers the sustainability effects of implementing different strategic reasonable alternatives for housing need and distribution against the framework. The main sustainability issues for housing, overall quantum of housing numbers and the broad locations for new homes within Bristol have therefore already been considered.

The following section of the Interim Sustainability Appraisal assesses the likely sustainability effects of the remaining policies within the Housing chapter of the March 2019 Consultation Draft.

Additional sustainability issues related specifically to housing type have been identified as follows:

- Average house prices in Bristol have increased by £117,200 over the last ten years, an increase of 70%³¹. This compares with an increase of 41% for England and Wales over the same period. However, earnings in Bristol are comparable to the national average which results in a 'housing affordability ratio' of around 8.89 (above the national average of 7.83)³².
- Figures from November 2019 indicate a total of 98 people sleeping rough in Bristol³³, and there were at least 618 homeless households in March 2020 which the council has a statutory duty to house.
- Between 2006 and 2018, 4,029 gross affordable housing units were completed, which amounts to 60.6% of the affordable target set by the Core Strategy. Over half the supply of affordable units was in the Bristol North and Bristol South SHMA Zones, with far lower proportions in the Bristol North West, Bristol Inner West, Bristol Inner East and Bristol East. Section 106 receipts between 2017/18 for affordable housing totalled £385,918.94³⁴.
- Since the adoption of the Site Allocations and Development Management Policies and Bristol Central Area plan, a large proportion of sites have either been wholly completed, are under construction or benefit from planning permission however which are not yet constructed³⁵.
- Whilst the stock of HMOs is contributing to meeting housing needs, increased numbers of multiple occupancy properties are leading to harmful impacts where concentrations exist. Concentrations within neighbourhoods can also lead to imbalanced and unsustainable communities and can damage the residential amenity and character of surrounding areas.
- Just under half of University of Bristol students (44%) reported some depressive symptoms, with lower mental being and higher levels of depression in females, non-binary, students from minority ethnic backgrounds, overseas students and first generation HE students and disabled students³⁶.
- Over the last 5 years there has been an increase in university student numbers of 8,300 (18%), mainly due to an increase in full time students studying at University of Bristol³⁷. Bristol also has

³¹ ONS UK House Price Index (2020) from BCC State of Bristol: Key facts (June 2020)

³² ONS Affordability Ratio (2020) from BCC State of Bristol: Key facts (June 2020)

³³ <https://www.gov.uk/government/collections/homelessness-statistics#roughsleeping%2069>

³⁴ Bristol Development Monitoring Report 2018

³⁵ Bristol Development Monitoring Report 2018

³⁶ University of Bristol Mental Health and Wellbeing 'Student Strategy' (2018)

³⁷ State of Bristol Key Facts 2020

a high rate of hospital admissions for self-harm among 10-24 year olds at 618 per 100,000 compared to 421.2 per 100,000 for England³⁸.

- Bristol's healthy life expectancy (years living in good health) is 61.1 years for women and 60.8 years for men (significantly worse than the national average of 63.9 and 63.4 years respectively)³⁹. The population in older age groups in Bristol is projected to increase by almost 30% by 2036. Over a fifth of the overall population growth (78,900 people) between 2016 and 2036 will be aged 65 and over; this includes an extra 4,700 people aged 85 and over.
- Wider Bristol Strategic Housing Market Assessment has modelled the need for wheelchair adapted housing across all age groups within the housing market area. The modelling indicates some five thousand additional households needing wheelchair adapted housing by 2036.
- Bristol has a substantial Gypsy, Roma and Traveller (GRT) population; however, the exact population of these communities are unknown. Around 25% of the GRT population in the southwest reside in Bristol City Centre with only 5% residing in caravans. Bristol is part of a large and historical Traveller trade route and most of Bristol's GRT communities are housed (due to lack of site provision)⁴⁰.

Policies within the 'Housing' chapter of the Draft Local Plan are set out in Table 4 below. The grouped policies seek to ensure the delivery of new and affordable homes, whilst ensuring: the best use is made of existing development allocations; residential sites reserved for homes are not unnecessarily used for other purposes; and by managing the development of student housing to safeguard existing communities whilst supporting thriving universities. These policies also recognise that a mix of housing types and sizes is better able to meet the changing needs and aspirations of its residents and to adapt to future changes in household size and form. Delivering greater choice, better quality homes and better accessibility can contribute to housing mobility and allow flexibility over time.

As housing is a core theme within the Local Plan Review, these policies are therefore directly linked to several of the Local Plan Objectives:

- Establish a planning approach which sees development of new and affordable homes as a core objective in development decisions, significantly increasing the number of new and affordable homes;
- Allocate new sites for housing and mixed use development and highlight sites with potential for housing development and ensure that the best use is made of existing development allocations;
- Make sure residential sites are reserved for development of new and affordable homes and not unnecessarily used for other purposes;
- Encourage innovation in the design, construction and location of diverse housing solutions; diversify the housing offer, promoting new building types and tenures such as build for rent, housing for older people and self-build; and
- Manage the development of student housing to safeguard existing communities and support delivery of new homes whilst supporting thriving universities.

³⁸ Bristol City Council and NHS (2019 / 20) JSNA Health and Wellbeing Profile 2019/20

³⁹ State of Bristol Key Facts 2020, from ONS 2016-18, via PHOF 2020

⁴⁰ Bristol City Council and NHS (2019 / 20) JSNA Health and Wellbeing Profile: 2019/20 <https://www.bristol.gov.uk/documents/20182/3849453/JSNA+2019+-+Gypsy+Roma+Travellers+%28updated+Oct+2019%29.pdf/85405b07-f8ab-f704-92a0-84ab18f42a11>

Table 4 Retained and existing policies and evidence

Draft Policy	NPPF	Retained Policies	Evidence
Draft Policy H1	See Section 5 of the Interim SA		
Affordable Housing (BCS17 and DM3)	Para 20, 34, 61 64,	N/A	Joint Spatial Plan evidence on affordable housing, HMO SPD 2020
Draft Policy H2		Not proposed to retain Policy BCS5.	
Draft Policy H3	Paragraph 122, 123	Policy SA1 and retained Site Allocations ⁴¹	
Draft Policy H4	Paragraph 61 67	Not proposed to retain Policy BCS18.	
Draft Policy H5	Self-building and Custom Housebuilding Act, Paragraph 61	Retained Policies BCS12 'Community facilities' and DM5 'Protection of community facilities'	
Draft Policy H6	Paragraph 61, 91	Not proposed to retain Policy DM2	
Draft Policy H7	Paragraph 61	Not proposed to retain Policy DM2 or BCAP4	
Draft Policy H8	Paragraph 61	Not proposed to retain Policy DM2	
Draft Policy H9	Paragraph 127	Not proposed to retain Policy DM2 or DM4	
Draft Policy H10	Planning Policy for Traveller Sites (2015)	Not proposed to retain Policy BCS19	

Stage 2: Identify and describe realistic alternatives

Policy alternatives which would result in a reliance upon existing adopted Core Strategy / SADMP policy approaches are generally not considered to be reasonable alternative policy options, and are therefore not subject to assessment against the SA Framework. Taking this into consideration, alternatives for each of the draft policies under the 'Housing' Policy Theme are set out and elaborated in turn below.

Draft Policy H1: Delivery of new homes

Alternatives for this policy are presented in detail within the appraisal of strategic reasonable alternatives for housing need in Section 5 of the main Interim SA report and as such, are not discussed further here.

Providing Affordable Homes

Currently, Policy BCS17 within the Core Strategy refers to affordable housing percentage requirements by SHMA Zones for major housing sites of 15 dwellings or more. This requires 40% of affordable homes in the North West, Inner West and Inner East Bristol zones and 30% in all other locations. An indicative citywide tenure split of 77% social rented and 23% intermediate affordable housing is sought. Policy DM3 sets out the affordable housing requirement from smaller residential developments comprising between 10-14 dwellings.

⁴¹ <https://www.bristol.gov.uk/documents/20182/4854983/Local+Plan+Review+-+Retained+Policies+List.pdf/4ab63497-b4f7-1ed0-9f48-c6d15a29f4b0>

In April 2018, the Affordable Housing Practice Note⁴² was updated to incentivise the provision of more affordable homes, particularly within Bristol City's Inner West and Inner East zones under policy BCS17, and to achieve the Mayoral objective to build 800 affordable homes per year by 2020. For an interim period, applications that meet a 'threshold' of at least 20% affordable housing within these inner areas were not subject to viability testing.

As the NPPF deems policies relating to 'affordable housing' as strategic policies, the Joint Spatial Plan Policy 3 had set the planning policy approach to ensure that new development will provide more new affordable housing. To enable conformity with this strategic level plan, a draft policy was therefore not defined within the March 2019 Consultation Draft Plan. However, policies for growth and regeneration areas and proposed development allocations within the March 2019 draft will be expected to contribute to the provision of affordable housing in accordance with this policy context.

As the proposed policy approach to affordable housing was defined by the JSP at the time of the March 2019 Consultation draft, it is not for this Interim Sustainability Appraisal to re-test the significance of effects at this stage. Future versions of the Affordable Housing policy will need to be assessed within the next iteration of the SA.

Draft Policy H2: Preventing loss of residential accommodation

Option 1 No new policy in relation to preventing loss of residential accommodation within the Local Plan

The draft Policy H2 recognises similarities to draft Policy BCS5, which states that *'in order to maintain the net housing stock, existing homes will be retained unless they are unsuitable for residential uses, would be used for essential local community facilities or would be replaced'*. Given the draft Local Plan objectives and development strategy are strongly focused on the development of new and affordable homes, it is relevant to reiterate that residential homes are not unnecessarily lost to other uses subject to specific circumstances.

Therefore, this option was not considered to be a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to preventing loss of residential accommodation within the Local Plan

This option would expand upon the approach within Policy BCS5 to ensure the prevention of the loss of residential accommodation. Similar to BCS5, this option would seek to maintain the net housing stock and refuse planning applications which involved the loss of existing homes unless: the site is unsuitable for continued residential use or the home would be replaced. The key difference between BCS5 and draft Policy H2 is that planning permission will not be granted for a proposal involving the loss of an existing home unless: the *'loss of existing homes would be necessary to provide for essential infrastructure or local community facilities'*. This policy applies to all properties falling within Use Class C3 Dwellinghouses and Class C4 Houses of Multiple Occupation.

This option aligns with Paragraph 92 of the NPPF which seeks to guard against the unnecessary loss of valued facilities and services, whilst both significantly boosting and maintaining the supply of

⁴² Bristol City Council Affordable Housing Practice Note (April 2018)

homes to contribute towards meeting Bristol’s housing needs. This option was considered to represent a reasonable alternative for the Local Plan Review.

Reasonable Alternative	Yes
Rationale	This policy aligns with national objectives to significantly boost and maintain the supply of homes, and at a local level seeks to ensure the delivery of new and affordable homes whilst preventing the loss of existing stock to other uses.
Recommendations for Evidence Update	Up-to-date evidence in relation to definition of ‘essential infrastructure’.

Draft Policy H3: Making the best use of site allocations

Option 1 No new policy in relation to making the best use of site allocations within the Local Plan

There are a total of 75 sites allocated for housing in the Site Allocations and Development Management Policies (July 2014) with a net capacity of 7,715 dwellings. In addition, there are a further 35 allocated and key sites within the Bristol Central Area Plan (adopted March 2015) with a net capacity for 6,636 dwellings⁴³. Around 20 allocations from both plans have been wholly completed, whilst around 44 sites have commenced construction of units. More than 30 sites have planning permission however these have not yet been constructed.

The development strategy is focussed on ensuring the delivery of new and affordable housing as a primary objective in development decisions. To enable this objective to be met, there is a need to make the best use of all existing and proposed site allocations for residential development. A ‘policy-off’ alternative is not considered to be compliant with the changing current situation.

Option 2 Introduce new policy in relation to making the best use of site allocations within the Local Plan

This option would introduce a new policy requirement which seeks to ensure that new homes or mixed use allocations with housing should not be developed for other purposes unless there is an overriding need. This would require retained allocations to optimise the use of land for the delivery of housing in accordance with other policies in the local plan. Proposals should:

- Aim to exceed where appropriate any estimated capacity for the site stated in the Local Plan; and
- Be consistent with minimum density policies within the Local Plan.

Allocated residential sites may be only used for other uses for which there is an overriding need. The policy supporting text suggests that this could include needs for schools or essential community facilities which cannot be accommodated elsewhere. In these cases, the policy requires that development would still aim to make the most efficient use of land and to incorporate an element of housing if possible.

In relation to site capacity, the policy explains that an estimated number of homes for retained allocations is indicated but this is not intended as a cap. The capacity is given as an estimate based on achieving an efficient use of land; it is not a maximum number of homes. If the capacity indicated

⁴³ Bristol Development Monitoring Report (2018)

is not possible due to site considerations, a lower number of homes than the one stated would be appropriate.

Reasonable Alternative	Yes
Rationale	This policy aligns with national objectives to significantly boost and maintain the supply of homes, and Local Plan objectives to ensure the delivery of new and affordable housing as a primary objective.
Recommendations for Evidence Update	Up-to-date evidence of what constitutes 'overriding need'.

Draft Policy H4: Housing type and mix

Option 1 No new policy in relation to housing type and mix within the Local Plan

This option would essentially represent a 'no new policy' in relation to the provision of housing mix and a reliance on adopted policy BCS18. Policy BCS18 previously defined an appropriate tenure, type size, and mix, and required developments to respond to the requirements of a changing population, whilst employing imaginative design solutions.

Given the change in current situation, and the need to secure an efficient use of land and optimised density to meet housing need, retaining the current policy position was not considered to be a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to housing type and mix within the Local Plan

This option would see the introduction of a new policy which seeks to maintain, provide or contribute to a mix of housing to help support the creation of mixed and balanced, inclusive communities. Delivering a greater choice of homes can contribute to housing mobility, allow households to remain within their communities when circumstances change and allow for adaptation to future changes in household size.

Development proposals should contribute to an appropriate mix of housing by having regard to the following:

- Securing efficient use of land and optimising density;
- The existing housing profile of an area;
- Local housing requirements;
- The need to redress harmful housing imbalance that exists within an area; and
- The characteristics of the site, including its suitability for different housing types.

Within Growth and Regeneration Areas, an appropriate proportion of homes of various sizes will be sought in accordance with the provisions of these policies and relevant supplementary documents.

Reasonable Alternative	Yes
Rationale	Paragraph 67 of the NPPF requires that 'planning policies should identify a sufficient supply and mix of sites', and to assess the 'size, type and tenure of housing needed for different groups in the community' (Paragraph 61). The proposed draft policy H4 therefore sets out principles for securing an appropriate mix of housing.
Recommendations for Evidence Update	It is recommended that further information be provided on the types of evidence sources which can be used to inform the size, type and tenure of housing

	provided through an application. This may include providing an update to the SHMA to set out the current housing profile, and, mix and requirements across different Growth and Regeneration Areas. In accordance with NPPF Paragraph 61, this should ensure that housing is provided for different groups in the community, including those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, private renters and people wishing to build their own homes.
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Other alternatives could include specifically defining the appropriate level of type and mix based on SHMA sub-areas or within the Growth and Regeneration areas, or setting out exclusions for particular types of units in areas where there is already a concentration.

Draft Policy H5: Self-build and community-led housing

Option 1 No new policy in relation to self-build and community-led housing within the Local Plan

Self-building and community land trusts were considered to represent additional mechanisms to contribute to the housing target set within Core Strategy Policy BCS5. However, since the adoption of the Core Strategy, the Self-build and Custom Housebuilding Act 2015 was introduced which requires local authorities to keep a register of those seeking to acquire serviced plots for self-build or custom-housebuilding, and to give enough suitable development permissions to meet the identified demand.

Given the requirement in NPPF Paragraph 61 to providing the size, type and tenure of housing needed for different groups, including people wishing to commission or build their own homes, it is not considered to be a realistic alternative not to propose any new policies in relation to self-build or community-led housing.

Option 2 Introduce new policy in relation to self-build and community-led housing within the Local Plan

This option encourages the delivery of new homes through self-build, custom housebuilding and other community-led approaches, as a means of contributing to greater housing choice and providing lower cost options for households. Specifically, this policy option offers three approaches for delivering land for self-build, custom-housebuilding and community-led housing to help meet identified demand:

- Specific site allocations for self-build, custom-housebuilding and community-led housing;
- Provision of at least 5% of self-build, custom housebuilding and other community-led as part of new development on four Green Belt sites; and
- Delivery of a proportion of self-build / custom-build housing and / or community-led housing to be sought as part of the overall development of identified growth and regeneration areas.

Homes developed for self-build and custom housebuilding and/or community-led housing are not required to provide affordable housing.

Proposals for community-led housing may also be permitted through 'exception sites'. These must be at a scale appropriate to the location and to the level of local needs, however locations which may be permitted include:

- Redundant community facilities land or buildings (Retained Policy BCS12 and DM5);
- Underused land or sites within Industry and Distribution Areas (Draft Policy E4);

- Sites subject Draft Policy E7 New workspaces within mixed-use development; and
- Reserved Open Space (Draft Policy GI2 Reserved Open Space) provided that the proposal is demonstrably supported by the local community and no deficiency of open space will result.

Reasonable Alternative	Yes
Rationale	Since the adoption of the Core Strategy, the Self-build and Custom Housebuilding Act 2015 requires local authorities to keep a register of those seeking to acquire serviced plots for self-build or custom-housebuilding and to give enough suitable development permissions to meet the identified demand. In addition, the NPPF Paragraph 61 requires that the needs of different communities should be reflected in planning policies, including people wishing to commission or build their own homes.
Recommendations for Evidence Update	Evidence should be provided on the spatial profile of ‘identified demand’ for self-build and community-led housing. Guidance should also be provided for the delivery of self-build/custom-build housing and community-led housing as part of larger development sites.

Draft Policy H6: Homes in multiple occupation and other shared housing

Option 1 No new policy in relation to homes in multiple occupation and other shared housing within the Local Plan

This Option would essentially be a ‘no new policy’ option and would therefore be a continuation of existing adopted policy in relation to homes in multiple occupation (HMO) development (Policy DM2 of the SADMP). While this option would set out circumstances where development for HMO and other forms of shared housing would not be permitted, it does not include a quantitative approach to the identification of a ‘harmful concentration’ of such development.

Given the change to the current situation, and the introduction of a new SPD in relation to HMOs within the city, it is not considered a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to homes in multiple occupation and other shared housing within the Local Plan

This option would introduce a revised policy approach (‘March 2019 Consultation Option’) to address the impacts and issues related to the development of houses in multiple occupation (HMO) and other shared forms of housing.

The policy would form a material consideration for any development proposals for HMOs that require planning permission – which include all large HMOs in most areas and both small and large HMOs⁴⁴ in any areas covered by a relevant Article 4 Direction (A4D). It would not relate to conversion of existing residential housing stock (Use Class C3) to HMOs (C4) under permitted development rights (PDR) outside the city’s defined Article 4 Direction (A4D) areas.

The policy would set out city-wide criteria for the development or intensification of HMOs and other forms of shared housing, where there would be a presumption against development that would harm residential amenity or character of the locality by:

- Levels of activity that cause excessive noise and disturbance to residents; or

⁴⁴ ‘Small’ HMOs are defined as 3-6 persons (under Use Class C4, as defined by the Town and Country Planning (Use Classes) Order 1987 (as amended)); and large HMOs (‘sui generis’) are those with six or more persons.

- Levels of on-street parking that cannot be reasonably accommodated or regulated through parking control measures; or
- Cumulative detrimental impact of physical alterations to buildings and structures; or
- Inadequate storage for recycling/refuse and cycles.

Alongside accounting for the proximity to existing specialist student accommodation, the policy would require that applications be refused where they would create or contribute to a harmful concentration of HMOs or shared housing, due to any of the following reasons:

- Exacerbating existing harmful conditions including those listed above; or
- Any residential property being directly between two houses in multiple occupation; or
- Reducing the choice of homes in the area by changing the housing mix.

This policy would include a definition of a harmful concentration of HMOs, which are specified as more than 10% of the total dwelling stock being occupied by HMOs and/or purpose-built student accommodation. Under this option, proposals for the conversion of existing dwellings or new development of HMOs, and/or intensification of existing HMOs, will not be permitted where development would exceed this 10% threshold.

In addition, the policy would require HMOs and other shared housing to be developed to a good standard by being compliant with relevant standards relating to licensable accommodation; and relevant requirements set out in other development plan policies.

New HMOs and other relevant forms of shared housing will need to meet the BCC standards for licensed properties under Parts 2 and 3 of the Housing Act 2004 (May 2017)⁴⁵ or as otherwise amended or replaced.

Reasonable Alternative	Yes
Rationale	<p>This option would respond to the key sustainability issues set out in BCC HMO SPD, recognising the potential harmful effects existing HMO development has on existing communities within the city.</p> <p>It would also align with NPPF requirements for Local Plans to reflect the range of housing types and tenures needed by different groups in the community (para 61); and help achieve the creation of inclusive and safe places, which promote social interaction and enable healthy lifestyles (para 91). PPG also identifies the delivery of more dedicated student accommodation as a way of relieving pressure from the private rented sector and increasing the overall housing stock⁴⁶; this option would ensure that delivery of such accommodation would not cause harmful concentration within Bristol’s existing communities, in alignment with national policy guidance.</p>
Recommendations for Evidence Update	Evidence for the concentration threshold of 10%.

Other options could consider higher or lower thresholds for defining ‘harmful concentration’, based on the latest available evidence. Evidence will be needed to justify these thresholds before testing of reasonable alternatives is undertaken.

Draft Policy H7: Managing the development of purpose-built student accommodation

⁴⁵ <https://www.legislation.gov.uk/ukpga/2004/34/contents>

⁴⁶ Paragraph: 004 Reference ID: 67-004-20190722

Option 1 No new policy in relation to purpose-built student accommodation within the Local Plan

This Option would involve continuation of the policy approach set out within Policy DM2 of the SADMP and BCAP4 of the BCAP, where specialist student housing schemes are acceptable within the city centre; and other locations may be suitable subject to the general criteria outlined within the existing policy.

Given that this policy is not proposed to be retained and the change to the current situation, including projected university growth figures set out within the Draft Local Plan and the introduction of Growth and Regeneration Areas as part of the Development Strategy; this is not considered a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to purpose-built student accommodation housing within the Local Plan

This option ('March 2019 Consultation Option') would set out the Local Plan's approach to delivering a sustainable increase in purpose-built student accommodation (PBSA), by ensuring that development is limited to appropriate locations, avoids harmful impacts upon residential areas, promotes diversity of uses within commercial areas and balances the city's wider housing requirements.

General provisions for the provision of PBSA would be set out within the policy, requiring development to:

- Ensure that there will be no adverse impacts on surrounding communities and areas;
- Be subject to an appropriate management regime;
- Be car-free and deter occupants from the parking of cars elsewhere in the city;
- Make provision for disabled access and disabled parking for occupants and visitors;
- Include active frontages and incorporate active ground floor uses wherever possible and appropriate.

New locations for PBSA would be identified (Diagram 7.1 of the Draft Local Plan – March 2019 Consultation Version) which comprise both existing campuses and locations that would support the Development Strategy, to include:

- Up to 800 bed spaces within the existing University of Bristol precinct, up to 200 bed spaces within the existing Clifton residential campus and up to 1,000 bed spaces within the existing Stoke Bishop residential campus;
- At appropriate locations identified and demonstrably supported by local communities, including through Neighbourhood Development Plans;
- Up to 3,000 bed spaces at Bristol Temple Quarter (2,300) and St. Philip's Marsh (700);
- Up to 1,000 bed spaces within Bristol Shopping Quarter (Broadmead) and Frome Gateway;
- Up to 1,000 bed spaces within Central Bedminster; and
- Up to 500 bed spaces at Western Harbour.

The policy option would require that development within Bristol Temple Quarter, St. Philip's Marsh, Bristol Shopping Quarter, Frome Gateway, Central Bedminster and Western Harbour provide a proportion of affordable student housing to meet identified need.

In addition, the policy sets out that other locations for PBSA should only form part of mixed-use developments comprising a proportion of other residential uses; and should:

- Avoid areas with a primarily residential context;
- Not result in harmful impacts or a harmful concentration of purpose-built student accommodation within any commercial area;
- Not conflict with the delivery of other planning objectives for the area in which it is proposed;
- Where the development comprises self-contained (Use Class C3) accommodation provide a contribution towards general purpose affordable housing in line with Joint Spatial Plan Policy 3.

Reasonable Alternative	Yes
Rationale	<p>Bristol’s higher education establishments have seen significant growth in recent years; and are projected to increase numbers of students substantially over the next 10 years. The expansion in higher education has increasingly seen the development of PBSA, mostly within the city centre; of which has encouraged renewal, vitality and re-use of redundant office spaces. However, it is acknowledged that such development also introduces harmful impacts, including for residential amenity and local character.</p> <p>The NPPF requires local planning authorities to plan for a mix of housing needed for different groups, including students (para 61). Updated PPG sets out the requirement for strategic policy-making authorities to plan for sufficient student accommodation, including communal halls of residence or self-contained dwellings, both on and off campus⁴⁷. By setting out key locations where the principle of student accommodation is supported, alongside general provisions to ensure this development is delivered sustainably and to high-quality, this option is therefore in broad alignment with national policy.</p>
Recommendations for Evidence Update	<p>Evidence base data relating to higher educational establishments to understand current and future student accommodation requirements.</p> <p>Updated BCC Student Accommodation Topic Paper 2014.</p> <p>Updated requirement for the provision of affordable housing.</p>

Draft Policy H8: Older peoples’ and other specialist needs housing

Option 1 No new policy in relation to older peoples’ and other specialist needs housing within the Local Plan

This Option would essentially be a no new policy option that would therefore continue the existing policy approach as set out within Policy DM2 of the SADMP. Given that this policy is not proposed to be retained and the change to the current situation, including the key sustainability issues presented by an increased ageing population within the city; it is considered that an updated policy approach is required to ensure delivery of adequate housing for particular needs groups. As such, this option is not carried forward as a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to older peoples’ and other specialist needs housing within the Local Plan

This option (‘March 2019 Consultation Option’) would set out additional development requirements, including that:

- Specialist older people’s housing developments comprising 60 dwellings or more should provide a minimum of 10% affordable specialist older people’s housing delivered on-site;

⁴⁷ Paragraph: 004 Reference ID: 67-004-20190722

- Development be located close to shops, services, community facilities and open space appropriate to the needs of the intended occupiers or provided on-site;
- Development is located close to good public transport routes;
- At least 50% of dwellings are designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users (compliant with Building Regulations M4(3) Category 3: Wheelchair user dwellings); and
- All dwellings designed to be accessible and adaptable (compliant with Building Regulations M4(2) Category 2: Accessible and adaptable dwellings) except for those dwellings that are designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.

Reasonable Alternative	Yes
Rationale	<p>The population in older age groups in Bristol is projected to increase by almost 30% by 2036; while many of this demographic will chose to remain in their current homes, there is a clear need for appropriate housing that provides for greater accessibility needs to ensure independent living is maintained.</p> <p>This option would be in alignment with the NPPF, which outlines that LPAs should plan for a mix of housing needed for different groups, including older people and those with disabilities (paragraph 61). It would also accord with updated PPG⁴⁸, which sets out that Plan-making authorities should set clear policies to address the housing needs of groups with particular needs including older and disabled people. Policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require; provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.</p> <p>By requiring that a minimum 50% dwellings are designed to be wheelchair accessible, and all dwellings accessible and adaptable for remaining users, this option would also be compliant with Building Regulations M4(3) Category 3: Wheelchair user dwellings) and M4(2) Category 2: Accessible and adaptable dwellings.</p>
Recommendations for Evidence Update	<ul style="list-style-type: none"> • Evidence base data relating to current and future older persons / specialist housing needs. • Updated Wider Bristol HMA Strategic Housing Market Assessment (SHMA).

Other alternatives could consider lower thresholds for the requirement for on-site affordable housing; or require a higher percentage be delivered for proposals in excess of 60 dwellings (i.e. above 10%). Evidence will be needed to justify these thresholds before testing of reasonable alternatives is undertaken.

Draft Policy H9: Accessible homes

Option 1 No new policy in relation to accessible homes within the Local Plan

This option would maintain the existing Local Plan approach to accessibility, where development of older person’s housing schemes are required to have 20% units as wheelchair accessible (as per Policy DM2 of the SADMP); and 2% of new housing within residential developments of 50 dwellings or more should be designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users (as per Policy DM4 of the SADMP).

⁴⁸ Paragraph: 006 Reference ID: 63-006-20190626

Given that these policies are not proposed to be retained and the change to the current situation, including the key sustainability issues presented by an increased ageing population and the need for adaptive housing⁴⁹ within the city; it is considered that an updated policy approach is required to ensure delivery of adequate housing for particular needs groups. As such, this option is not carried forward as a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to accessible homes within the Local Plan

This option (‘March 2019 Consultation Option’) would introduce an updated approach to the delivery of accessible residential development within the new Local Plan; this would seek to supplement proposed Policy H8 which addresses the needs of older and disabled people.

This policy provides an approach to securing these standards from new residential development using the national optional technical standard for access introduced in March 2015. The standards are implemented through Building Regulations Approved Document M.

The policy would set additional requirements for residential development, to include the following:

- At least 10% of new build housing in proposals of 50 dwellings or more designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users (compliant with Building Regulations M4(3) Category 3: Wheelchair user dwellings); and
- All new build housing designed to be accessible and adaptable (compliant with Building Regulations M4(2) Category 2: Accessible and adaptable dwellings) except for those dwellings that are designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.

The policy would specify that, where for reasons of topography or other specific factors a site or individual plot is less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable, alternative provision to ensure the dwelling achieves an appropriate level of accessibility will be sought.

Reasonable Alternative	Yes
Rationale	<p>To help address the needs of older and disabled people and to ensure delivery of inclusive growth, it is important that sufficient new homes are designed to provide higher levels of accessibility. With increasing numbers of older people, the incidence of disability increasing with age and with general population growth, more new homes will need to be delivered within Bristol that incorporate features to assist a range of occupiers.</p> <p>Updated PPG⁵⁰ outlines that where an identified need exists, plans are expected to make use of the optional technical housing standards (footnote 46 of the NPPF) to help bring forward an adequate supply of accessible housing. This option would align with national guidance, including where it sets out the proportion of new housing that will be delivered to the following standards:</p> <ul style="list-style-type: none"> • M4(2) Category 2: Accessible and adaptable dwellings • M4(3) Category 3: Wheelchair user dwellings
Recommendations for Evidence Update	<ul style="list-style-type: none"> • Evidence base for / viability of optional technical standards.

⁴⁹ The Wider Bristol HMA Strategic Housing Market Assessment (2015) modelling indicates approx. 5000 additional households requiring wheelchair-adapted housing by 2036.

⁵⁰ Paragraph: 009 Reference ID: 63-009-20190626

- Updated Wider Bristol HMA Strategic Market Assessment.

Other alternatives could consider lower thresholds for the requirement for wheelchair accessible dwellings (e.g. 40 dwellings) or require a higher percentage be delivered for proposals in excess of 50 dwellings (i.e. above 10%). Evidence will be needed to justify these thresholds before testing of reasonable alternatives is undertaken.

Draft Policy H10: Planning for traveller sites

Option 1 No new policy in relation to traveller sites within the Local Plan

This option would effectively be a no new policy option that would rely on existing Local Plan approach with regards to gypsies, travellers and travelling showpeople (Policy BCS19 of the Core Strategy).

Given the change to the current situation, including the need to address additional elements of national policy guidance published since adoption of the current Local Plan (updated Planning Policy for Traveller Sites⁵¹ and NPPF⁵²), this option is not considered a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to traveller sites within the Local Plan

This option ('March 2019 Consultation Option') would set out the approach to the location of proposals for residential sites for travellers and travelling showpeople.

The policy specifies the requirements for proposals for residential pitches for travellers or plots for travelling showpeople, which should be located and designed in order to:

- Provide acceptable living conditions for the future occupiers of the site;
- Enable to access local services and facilities;
- Ensure there is no demonstrable harm to the living conditions of settled community;
- Be sympathetic to the character and appearance of the surrounding area;
- Include appropriate access to the primary route network;
- Provide safe pedestrian, cycle and vehicular access onto the site;
- Enable adequate provision for parking, turning and servicing of the site having regard to the specific needs of people with a travelling lifestyle; and
- In the case of sites for Travelling Showpeople, include adequate provision for storage and maintenance.

In addition, the policy would set out that proposals will be considered having regard to:

- The existing level of local provision and need for sites;
- The availability of alternative accommodation for the applicants; and
- Other personal circumstances of the applicant.

⁵¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

⁵² The NPPF was revised and updated in July 2018, with some further minor amendment in February 2019. The update added Travellers who do not meet the definition within the Planning Policy for Traveller Sites to the list of those groups whose need for homes should be identified.

A key difference between the existing policy and this draft policy option is the requirement to ensure there is no demonstrable harm to the living conditions of settled community. This option would not include provisions in respect of development in the Green Belt nor Flood Zones 2, 3a or 3b (as set out within Policy BCS19), in line with Paragraphs 16 and 17 of Planning Policy for Traveller Sites⁵³.

Reasonable Alternative	Yes
Rationale	<p>This option would accord with national Government’s overarching aim to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life while respecting the interests of the settled community.</p> <p>While there are no nationally set Government targets for the number of traveller pitches / plots that a local authority must provide, LPAs are encouraged to calculate the provision needed in their own areas⁵⁴. Planning Policy for Traveller Sites encourages LPAs to formulate their own evidence base for Gypsy and Traveller needs in their area and then to use this to set their own pitch targets in the Local Plan (para 10 (a) – (b)).</p> <p>By setting out specific provisions for the development of playing pitches for travellers or plots for travelling showpeople, this option would ensure delivery of sustainable housing development that promotes integration with the site and the local community; and would be in alignment with national Planning Policy for Traveller Sites⁵⁵ (para 13); and the recent briefing for Gypsy and Traveller site provision⁵⁶.</p>
Recommendations for Evidence Update	<ul style="list-style-type: none"> • Gypsies & Travellers and Travelling Showpeople Sites Local Plan document⁵⁷. • Refreshed Gypsy and Traveller Accommodation Assessment (GTAA), which was prepared for the West of England sub-region for the period 2006-2011. • Assessment of supply of deliverable and developable sites for travellers and a supply of specific, developable sites.

Stage 3: Assessment and evaluation of effects

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

- No reasonable alternatives were proposed within the March 2019 consultation version. The assessment of reasonable alternatives undertaken is therefore considered to be broad and requiring update as new and emerging guidance becomes available.
- Terms referred to within individual policies require further definition and evidence, including: ‘essential infrastructure’ (H2), ‘overriding need’ (H3), ‘identified demand’ (H5) etc.
- Alongside evidence to support the assessment of H1 (addressed further in Section 5, and includes a Strategic Housing Land Availability Assessment, Urban Potential update etc) a number of evidence base documents require updates to understand effects; including:
 - Strategic Housing Market Assessment: Evidence to inform the required size, type and tenure of housing provided through an application. This would also set out requirements

⁵³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

⁵⁴ House of Commons Library Briefing Paper No. 07005, 19 December 2019.

<http://researchbriefings.files.parliament.uk/documents/SN07005/SN07005.pdf>

⁵⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

⁵⁶ House of Commons Library Briefing Paper No. 07005, 19 December 2019.

<http://researchbriefings.files.parliament.uk/documents/SN07005/SN07005.pdf>

⁵⁷ Referenced in the SADMP.

for the provision of affordable housing need, including in relation to affordable student properties.

- Self-build register: This would enable an assessment of the spatial profile of 'identified demand' for self-build and community-led housing.
- Homes in multiple occupation and other shared housing: Evidence to inform the concentration threshold of 10%.
- Evidence for optional technical standards, including a requirement for a minimum 50% dwellings are designed to be wheelchair accessible.
- Evidence in relation to Gypsy and Traveller need, and assessment of deliverable and developable sites for provision.

Summary of assessment findings

Selected Approach for H2 Policy

The assessment below explores the effects of the implementation of Policy H2 as set out in the March 2019 Consultation draft. Whilst this option may have relatively localised effects at a site-specific level, when this is replicated across the city, this option should ensure that the existing stock of homes is not diminished unless specific circumstances prevail. Further definition of 'essential infrastructure or local community facilities' will be necessary to ensure that these specific circumstances are clearly articulated to inform future applications.

Selected Approach for H3 Policy

The assessment below explores the effects of the implementation of Policy H3 as set out in the March 2019 Consultation draft. The scale of effects of this option are not likely to be significant or longer term overall, as a large number of the retained allocations have either been fully built out, are under construction or benefit from planning permission. This Option is also reliant on the extent to which additional units on retained allocations are achievable based on site considerations.

Effects are likely to be minor positive when assessed against Objective 1 on the basis that this could increase a source of supply of homes to contribute towards housing need, however effects for a number of Objectives are unknown as this is based on the type of sites which are allocated.

Retaining reference to 'optimising the use of land for delivery of housing in accordance with other policies', and the option for the capacity to be lower based on site considerations, could provide a level of appropriate mitigation. The definition of 'overriding need' and those uses which may be considered acceptable as 'other purposes' should be set out.

Selected Approach for H4 Policy

The assessment below sets out the effects of the implementation of Policy H4 as set out within the March 2019 Consultation draft. The scale of effects could be city-wide and longer term in seeking to help support the creation of mixed communities (Objective 1 DMC3), whilst creating some indirect, minor positive effects for increasing the range of households that may be able to access local services, particularly where more efficient use of land is achieved.

Suggested additions could include providing a breakdown of the current mix of communities in Growth and Regeneration areas, possibly through an updated SHMA; alongside guidance for the

principles of delivering housing mix on site (i.e. 'pepper-potting', dispersal or clustering) to ensure that lower value units are not delivered in poorer parts of a development site.

Selected Approach for H5 Policy

The assessment below sets out the effects of the implementation of Policy H5 as set out within the March 2019 Consultation draft. This Option could have significant, longer term benefits for enabling alternative methods of delivery, including community-led and self-build (Objective 1,DMC4).

However, without appropriate mitigation or further guidance, this could be at the expense of redundant community facilities, underused land within IDAs, sites supporting new workspace within mixed use development and Reserved Open Spaces. Further guidance and clarity of definitions is therefore required in relation to: 'scale appropriate to the location'; the 'level of local need identified' which may deem the loss of ROS acceptable; definition of 'redundant community facilities'; and, 'underused' within an Industry and Distribution Area. Detailed guidance should be set out on the delivery of self-build/custom-build housing and community-led housing as part of larger development sites, Growth and Regeneration areas and for sites subject to Draft Policy E7 'New workspace within mixed use development'.

Further evidence should be provided into exceptions for affordable housing, to prevent schemes (particularly for serviced plots or higher value schemes) which may contribute less overall to affordable homes provision than typical market homes.

Selected Approach for H6 Policy

The assessment below sets out the effects of the implementation of Policy H6 as set out within the March 2019 Consultation draft.

This policy option could have minor positive effects for SA Objective 1 as it seeks to enable sustainable delivery of HMOs and other shared housing. Specifically, by introducing a threshold, this would seek to achieve a balance in the concentration of permitted HMOs and an appropriate mix of housing types to meet the needs of communities. Effects are not significant however, particularly against Objective 1 DMC2, as this is a restrictive policy for a more affordable housing type.

Although this policy may have a positive effect on good living conditions by reducing the harmful effects of concentrations, effects are also uncertain in relation to healthy living as they are reliant upon the implementation of other draft policies to deliver high-quality design that meets liveable space standards. Effects in relation to a number of SA Objectives are uncertain and dependent on implementation (for example sustainability standards, effect on natural environment).

Selected Approach for H7 Policy

The assessment below sets out the effects of the implementation of Policy H7 as set out within the March 2019 Consultation draft.

This policy option could generate a minor positive effect as it seeks to enable the sustainable delivery of PBSA, which could specifically respond to the needs of the growing student community within Bristol and provide a level of affordable student accommodation or affordable housing. This

option could have uncertain indirect effects on maximising the re-use or regeneration of previously developed land, the provision of key services to support student populations and healthy lifestyles.

Further consideration should be given to: the extent to which this Option would support provision of accommodation for all higher education establishments in the city; whether additional references should be made to provision of supporting infrastructure for students (including mental health support infrastructure) and to ensure cross-referencing of other policies in the plan so there are no adverse impacts of PBSA on surrounding communities, historic or ecological assets.

Selected Approach for H8 Policy

The assessment below sets out the effects of the implementation of Policy H8 as set out within the March 2019 Consultation draft.

This option could generate minor positive effects for SA Objective 1 as it seeks to enable the sustainable delivery of older peoples' and other specialist needs housing. As this option encourages development proposals to be sited close to shops, services and community facilities appropriate to the needs of the intended occupiers, this option could also have benefits for Objectives 3, 9 and 13. Further consideration could be given to the need for inclusive design to extend beyond internal configuration to the whole plot and relationship with adjacent uses.

Similar to H7, cross-referencing to other policies in the plan is necessary to ensure implementation of development does not result in harmful effects of development on designated assets.

Selected Approach for H9 Policy

The assessment below sets out the effects of the implementation of Policy H9 as set out within the March 2019 Consultation draft.

By setting out accessibility thresholds that would require development to ensure safe accessibility according to Building Regulations, this policy option could support the delivery of an appropriate mix of types and accessibilities of housing to meet the identified needs of all communities within the city. Whilst this option would also have benefits for the liveability standards (Objective 6), further consideration is needed to ensure that the policy also provides high standards and quality of design, higher level of open space and amenity space and inclusive design within the wider building plot to ensure well-being benefits for all future occupiers.

Selected Approach for H10 Policy

The assessment below sets out the effects of the implementation of Policy H10 as set out within the March 2019 Consultation draft. This option could generate minor positive benefit effects for SA Objective 1 as it sets out an approach to the development of residential pitches and/or plots to meet the needs of the travellers or travelling showpeople within Bristol. Whilst this policy could generate minor positive effects for Objective 3 in terms of accessibility to key services, until a stage when sites are defined, other effects are unknown.

Draft Policy H2 Preventing loss of residential accommodation

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	+	+	+	D	P	City-wide	R and AG: Bristol's population and households.	n/a
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7 DMC8	+/?	+/?	+/?	I	P	City-wide	R: Previously developed land AG: As above.	n/a
	3. Ensure easy and affordable access to key services	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	4. Increase participation in cultural and community activities	DMC10 DMC11	0/?	0/?	0/?	I	P	Local and City-wide	AG: Bristol's population.	AM: Local community facilities and essential infrastructure, within the context of this policy, should be defined to ensure the circumstances by which homes could be lost is clearly understood.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC12 DMC13 DMC14	+/?	+/?	+/?	Both	P	Local and City-wide	R: Built environment. AG: Bristol's population.	AM: Local community facilities and essential infrastructure, within the context of this policy, should be defined to ensure the circumstances by which homes could be lost is clearly understood.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC15 DMC16	0/?	0/?	0/?	I	P	Local and City-wide	R: Bristol's population. AG: All groups.	AM: Local community facilities and essential infrastructure, within the context of this policy, should be defined to ensure the circumstances by which homes could be lost is clearly understood.
Economy and Employment	7. Ensure access to education and learning for all sections of society	DMC17 DMC18 DMC19 DMC20 DMC21 DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	8. To support the economy and ensure that there are suitable opportunities for employment	DMC24 DMC25 DMC26 DMC27	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Townscape and Landscape	9. Ensure access to a range of shopping facilities for all sections of society	DMC28 DMC29 DMC30 DMC31	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	10. To ensure the protection and enhancement of the historic environment and its setting	DMC32 DMC33 DMC34 DMC35 DMC36 DMC37	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Transport	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC38	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a open space and recreation	DMC39 DMC40 DMC41 DMC42	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Climate, Energy and Waste	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC32 DMC33	0/?	0/?	0/?	I	P	Local and City-wide	R: Public health; AG: Bristol's population.	AM: Local community facilities and essential infrastructure, within the context of this policy, should be defined to ensure the circumstances by which homes could be lost is clearly understood.
	14. To maintain and improve the existing highway network	DMC34 DMC35 DMC36 DMC37	0/?	0/?	0/?	I	P	Local and City-wide	R: Bristol's highway network; public health; Bristol's population.	AM: Local community facilities and essential infrastructure, within the context of this policy, should be defined to ensure the circumstances by which homes could be lost is clearly understood.
Evaluation of Effects	15. To reduce the risk of flooding from all sources	DMC38 DMC39	0/?	0/?	0/?	I	P	Local and City-wide	R: Natural environment (water); AG: Bristol's population; local wildlife.	AM: Local community facilities and essential infrastructure, within the context of this policy, should be defined to ensure the circumstances by which homes could be lost is clearly understood.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC40 DMC41 DMC42	0/?	0/?	0/?	D	P	City wide	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	AM: Local community facilities and essential infrastructure, within the context of this policy, should be defined to ensure the circumstances by which homes could be lost is clearly understood.
Evaluation of Effects	17. Minimise air and noise pollution	DMC43 DMC44	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC45 DMC46 DMC47 DMC48	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<p>Rank Score: 1 – To support draft local plan objectives and development strategy principles which focus on ensuring the delivery of new homes, it is necessary to prevent the loss of existing housing stock, unless specific circumstances prevail. This option would therefore have positive effects for ensuring an adequate and diverse supply of housing, or either increasing participation in community activities or enabling the necessary provision of essential infrastructure.</p> <p>Scale of effects: Whilst the effects of keeping homes in use and preventing loss, subject to specific circumstances, may only have locally beneficial effects at a site level, the replication of these instances across the city could have more profound and city-wide effects.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> This option would help support the development strategy and draft Local Plan objectives which seek to ensure the delivery of new homes, by preventing the existing stock of homes from being diminished. This would therefore have a positive, city-wide effect in seeking to ensure the provision of sufficient housing to meet the needs of communities within the City (Objective 1). However, whilst this option could result in replacement of existing stock, in isolation it is unlikely to significantly contribute to the provision of market or affordable housing. By allowing for the loss of residential uses on sites which are no-longer suitable for continued residential use, this may indirectly result in provision of safer and better quality housing. By maintaining existing homes, or replacing these homes subject to specific circumstances, there is a policy presumption in favour of reusing previously developed land (Objective 2). Whilst the policy may not directly create opportunities for the provision of homes at higher densities within sustainable locations, this may be an indirect outcome if a home is to be replaced. 'Essential infrastructure' is not defined within the policy or supporting text. Therefore whilst there could be minor indirect positive effects by enabling the provision of infrastructure to support Objective 4 (participation in cultural and community activities), Objective 5 (offer potential for regeneration or investment in deprived areas), Objective 6 (reducing health inequalities), Objective 7 (ensuring access to education and learning), Objective 13 and 14 (offering and opportunity to improve access to sustainable transport modes and reducing levels of traffic) and Objective 15 (supporting sustainable and resilient flood management) this is uncertain. By providing better quality housing or conversely losing homes on sites no longer suitable for continued residential use, could also have indirect minor positive effects on Objective 6 by enabling development to take place which would contribute to good living standards. In accordance with the waste hierarchy, prevention and preparing for re-use are the two first steps which prevent waste from being generated. By ensuring existing homes are not lost, this option could therefore have direct positive benefits for reducing waste (Objective 16). 										

Draft Policy H3 Making best use of site allocations

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to making the best use of allocations						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/- / ?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	+/?	+/?	?	D	P	Local and city-wide	R: Local Housing Market and Bristol's population; AG: Bristol's population and households.	CR: Policies on housing mix and affordable homes. AM: Set out the definition of the 'overriding need' and those uses which may be considered acceptable.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	+/?	+/?	?	D	P	Local and city-wide	R and AG: Bristol's population and households	n/a
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	?	I	P	City-wide	R and AG: Bristol's population and households, and local businesses	n/a
	4. Increase participation in cultural and community activities	DMC9	?	?	?	I	P	Local		AM: Definition of 'overriding need' should be made explicitly clear to understand if this is likely to improve participation in cultural and community activities.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	?	I	P	City-wide	R and AG: Bristol's population and household within deprived areas.	n/a
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	+/?	+/?	?	I	P	City-wide	R and AG: Bristol's population and household within poor health areas.	AM: Retain reference to 'optimising the use of land for delivery of housing in accordance with other policies' to ensure that the benefits of density are judged against other spatial contributions (i.e. open space requirements). Consider the effect of higher densities on mental health and wellbeing.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	?	?	?	I	P	City-wide	R: Bristol's schools and educational establishments. AG: Bristol's population	AM: Definition of 'overriding need' should be made explicitly clear to understand if this is likely to result in a net gain of adequate educational facilities.
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	?	?	?	I	P	City-wide	R: Bristol's employees and employers. AG: As above, and Bristol businesses.	AM: Provide consideration of former employment uses that may have established since the adoption of SADMP or BCAP.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	?	Indirect	P	City-wide	R and AG: Bristol's population and households, and local businesses.	n/a
	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	Both	P	Local and City-wide	R: Cultural heritage; historic environment. AG: Bristol's population.	CR: Policies which ensure historic environment and townscapes are conserved and enhanced.
Townscape and Landscape	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	Both	P	Local and City-wide	R: Local wildlife and biodiversity; natural environment. AG: Bristol's population; wildlife.	CR: Policies which conserve and enhance the natural environment.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	Both	P	Local and City-wide	R: Local wildlife and biodiversity; natural environment. AG: Bristol's population; wildlife.	CR: Policies which conserve and enhance the natural environment.
Transport and Movement	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	?	?	?	Both	P	Local and City-wide	R: Bristol's population and natural environment. AG: Commuters and businesses.	AM / CR: Provide updated guidance on levels of parking provision, particularly for retained allocations beyond easy walking distance of services.
	14. To maintain and improve the existing highway network	DMC30 DMC31	?	?	?	Both	P	Local and City-wide	R: Bristol's population and natural environment. AG: Commuters and businesses.	n/a
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	Both	P	Local and City-wide	R: Natural environment (water); AG: Bristol's population; local wildlife.	n/a
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	17. Minimise air and noise pollution	DMC38	?	?	?	Both	P	Local and City-wide	R: Bristol's population and natural environment. AG: Commuters and businesses.	AM / CR: Provide updated guidance on levels of parking provision, particularly for retained allocations beyond easy walking distance of services.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Evaluation of Effects	<p>Rank Score: 1 – In seeking to make the best use of site allocations, this Option aims to ensure that retained allocations optimise the use of land for the delivery of housing in accordance with other policies in the Plan. Proposals should aim to exceed, where appropriate, any estimated capacity for the site stated in the Local Plan; and be consistent with minimum density policies within the Local Plan.</p> <p>Scale of effects: Whilst the scale of effects will be limited to the those retained allocations which have not been fully built out, are not under construction or do not already benefit from planning permission, effects are likely to be felt city-wide.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This option could have a minor positive effect on increasing the number of homes delivered to meet objectively assessed housing need (Objective 1). However this Option is reliant on the extent to which additional units on retained allocations are achievable based on site considerations. In addition, a large number of the retained allocations have either been fully built out, are under construction or benefit from planning permission, and therefore the effect of this option is not likely to be significant or longer term overall. Whilst this option does not prescribe the type of housing to meet identified need, exceeding estimated capacities could have indirect benefits of contributing to affordable housing and a mix of units. • This Option could have minor positive effects for directly encouraging development at a higher density on retained allocations (Objective 2, DMC5). The effects are uncertain however, as the extent to which this option would encourage the re-use or regeneration of previously developed land, or maintain greenfield or Green Belt land is dependent on the allocation itself. Site specific considerations may also mean that a higher capacity is not achievable, and again, longer term effects are uncertain. • For SA Objective 3 (DMC8), SA Objective 7 (DCM16) and SA Objective 9 (DMC22 and DMC23), this option could indirectly increase the number of homes within easy and affordable access to key services and community facilities. However, some retained allocations are beyond ‘easy walking distance’ of key services and therefore the assessment of this effect is therefore likely to be minor positive, however uncertain. • This Option allows allocations for new homes or mixed use allocations to be developed for other purposes where there is an overriding need, for which the supporting text suggests that this could include ‘essential community facilities’. It is therefore unclear at this stage whether this Option could indirectly support the delivery of schools or community facilities as the definition of ‘overriding need’ has not been established (Objective 4, Objective 7). • For SA Objective 5, the effect of this option will depend on the location of retained site allocations and the ability to exceed site capacity where possible with other site considerations. Where allocations are located within more deprived areas, aiming to exceed capacities could result in greater investment. The overall effects are likely to be minor positive, but uncertain. • For SA Objective 6, increasing the number of homes could indirectly improve healthy lifestyles and reduce health inequalities when compared to homelessness and overcrowding. Therefore, increasing capacities on sites could have minor beneficial effects at a city-wide level, however this should be balanced against the effects of higher densities on mental health and achieving other spatial contributions (including open space provision). Requiring proposals to optimise the use of land for delivery of housing in accordance with other policies will provide a level of appropriate mitigation, however the effect of higher densities on mental health and wellbeing should be considered. • This Option is unlikely to have an effect on supporting the economy and ensuring that there are suitable opportunities for employment use. If a former employment use that was allocated for residential uses has re-established since the adoption of SADMP or BCAAP, which is likely to be in a limited number of cases, this could prevent further development. In addition, reference within the supporting text to a draft allocation states that a lower capacity may be acceptable where a mix of uses is proposed. The overall effect is unknown; however this is likely to be neutral with appropriate mitigation measures set out. • For SA Objective 10, Objective 11 and 12, the effects of this Option will be dependent on the extent to which exceeding capacity: can sympathetically respond to either the historic and/or landscape character or setting; can be balanced against a need to deliver net gain in biodiversity; or ensure sufficient spatial consideration for multifunctional green infrastructure. Although retained policies are in place to minimise impacts, the overall effect is generally uncertain: in some instances, this will be mitigatable by balancing the conservation and enhancement of the historic environment, delivering sufficient net gain or multi-functional green space, however, in other instances the effect may be negative. • For SA Objective 13, 14 and 17 aiming to exceed densities of the retained allocations and optimising the use of land for the delivery of housing could have complex effects. By increasing the number of homes on retained allocations that are within easy walking distance of both services and public transport, this could indirectly reduce the need to travel by private car and therefore have minor positive effects on DM30. However, increasing the number of homes in locations that are beyond easy walking distance of these features, or increasing the number of car-parking spaces to reflect higher numbers of units, could indirectly increase movements and have an overall negative effect on these objectives. This would need to be considered during implementation / application stage. • For SA Objective 15, the effects of this Option are uncertain and are dependent on the location of the retained site allocation. Increasing the number of homes on retained allocations which are subject to flood risk could have direct negative effects when assessed against DMC32. However, as the supporting policy text requires ‘sites retained from the existing local plan to optimise the use of land for delivery of housing in accordance with other policies in the local plan’, development would be expected to be supported by site-specific flood mitigation and therefore the effects may be neutral.
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Draft Policy H4 Housing type and mix

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to housing type and mix						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/- / ?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	++/?	++/?	++/?	Direct	P	City-wide	R and AG: Bristol households and population.	AM: Define 'mixed, balanced and inclusive communities' and 'appropriate mix of housing' through area-based or Growth and Regeneration Area based housing profiles and proposed housing mix ratios. AM: Ensure additional up-to-date guidance on the current mix of housing in communities or Growth and Regeneration Areas is available. CR: Consider adding reference to 'in accordance with other policies in the Local Plan' in relation to criteria for delivering an appropriate mix of housing on site.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	+/?	+/?	+/?	Direct	P	City-wide	R: Various (urban and greenfield sites). AG: Bristol's population and households.	n/a
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	Indirect	P	City-wide	R: Bristol's population and households. AG: As above, and Bristol businesses.	n/a
Health and Inequalities	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	Indirect	P	Local and City-wide	R: Bristol's population and household within deprived areas. AG: As above.	MB: Additional information in required on the level of mix and the principles for delivering the type of mix (i.e. 'pepper-potting', dispersal or clustering) to ensure that lower value units are not delivered in poorer parts of a development site.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	+/?	+/?	+/?	Indirect	P	Local and City-wide	R: Bristol's population and household within poor health areas. AG: As above.	See above.
Economy and Employment	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	+/?	+/?	+/?	Indirect	P	City-wide	R: Bristol's population and households. AG: As above, and Bristol businesses.	n/a
	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Indirect	P	City-wide	R: Bristol's population and household within poor health areas. AG: As above.	n/a
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	Indirect	P	City-wide	R and AG: Bristol's population and households, and local businesses.	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	0/?	0/?	0/?	Indirect	P	Local	R: Cultural heritage; historic environment; AG: Bristol's population.	CR: Policies which ensure historic environment and townscapes are conserved and enhanced.
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Transport and Movement	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	?	?	?	Indirect	P	Local and City-wide	R: Bristol's population and natural environment. AG: Commuters and businesses.	AM / CR: Provide updated guidance on levels of parking provision, particularly for retained allocations beyond easy walking distance of services.
	14. To maintain and improve the existing highway network	DMC30 DMC31	?	?	?	Indirect	P	Local and City-wide	R: Bristol's population and natural environment. AG: Commuters and businesses.	n/a
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	17. Minimise air and noise pollution	DMC38	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Evaluation of Effects	<p>Rank Score: 1 – This Option would ensure that all residential development should maintain, provide and contribute to a mix of housing to help support the creation of mixed, balanced and inclusive communities. By expecting development proposals to contribute to a mix of uses whilst securing an efficient use of land and optimising densities, this option would have direct positive effects in achieving Objective 1 and 2.</p> <p>Scale of effects: This Option could have city-wide effects on maintaining, providing or contributing to a mix of housing units to help support the creation of mixed, balanced and inclusive communities.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This Option could have a significantly beneficial effect on providing an appropriate mix of types of housing to meet the identified needs or all communities within the City, whilst seeking to redress any harmful housing imbalance that exists in an area (Objective 1, DMC3). However without additional up-to-date guidance on the current mix of housing in communities or Growth and Regeneration Areas, and therefore what mix is to be maintained or contributed to, it is currently unclear whether this policy could meet the identified needs of all communities within the city (Objective 1, DMC2). • This Option could directly have a minor beneficial effect on Objective 2 by seeking to secure ‘efficient use of land’ and ‘optimised densities’ whilst contributing to a mix of housing (Objective 2, DMC6). This effect would not be significant however, as this policy option in isolation, would not have significant benefits for the reuse or regeneration of previously developed land, or maintenance of greenfield land. • Whilst this policy option could positively increase the range of households that can access key services (Objective 3), education (Objective 7), employment (Objective 8) and retail services (Objective 9), particularly in relation to securing efficient use of land and optimising density, this effect would be indirect and minor positive. The scale of effect would also be reliant on both the location of the development proposal and walkability to these services, alongside the ability to secure efficient use of land and optimised density. • The assessment of effects could be positive for Objective 4 and Objective 6 as increasing the mix of homes in areas could enable both social mobility and the ability for households to remain in their community when circumstances change, which could in turn have indirect benefits for mental health, community / social cohesion and wellbeing. Effects are uncertain, however, as this will be dependent on the location of the development proposals within the city, the level of mix required and the principles for delivering mix on-site (i.e. ‘pepper-potting’, dispersal or clustering) to ensure that lower value units are not delivered in poorer parts of a development site. • Depending on the extent to which mix effects the overall design of a development and the ability to sympathetically respond to either the historic and/or landscape character or setting, this Option could have an effect on this Objective. However, reference to appropriate mix of housing ‘where the characteristics of the site including its suitability for different housing types’ could allow for appropriate consideration of heritage assets. • For SA Objective 13 and 14 aiming to deliver housing mix whilst securing efficient use of land and optimising density could have complex effects. By achieving mix, securing efficient use of land and optimising density on sites that are within easy walking distance of both services and public transport, this could indirectly reduce the need to travel by private car and therefore have minor positive effects on DM30. However, optimising density in locations that are beyond easy walking distance of these features, or increasing the number of car-parking spaces to reflect higher numbers of units, could indirectly increase movements and have an overall negative effect on these objectives.
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Draft Policy H5 Self-build and community-led housing

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to					Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/- / ?)									
			Short	Med	Long							
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	+/?	+/?	+/?	D	P	City-wide	R and AG: Bristol's households and population.	AM: Consider whether exception to provision of affordable homes is based on development value compared to market homes. AM: Set out whether the proposed level of provision to meet demands on the self-build register. AM: Provide detailed guidance on the delivery of self-build/custom-build housing and community-led housing as part of larger development sites, Growth and Regeneration areas and for sites subject to Draft Policy E7 'New workspace within mixed use development'.		
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	-/?	-/?	-/?	D	P	Local and City-wide	R: ROS and other sites. AG: Bristol's population and households.	AM: Consider prescribing target densities for self-build and community-led sites, or reference other draft policies within the Plan. AM: Set out the 'scale appropriate to the location' and 'level of need identified' which would deem loss of ROS acceptable.		
	3. Ensure easy and affordable access to key services	DMC8	?	?	?	I	P	City-wide	R: Bristol's population and households. AG: As above, and Bristol businesses.	n/a		
	4. Increase participation in cultural and community activities	DMC9	0/?	0/?	0/?	D	P	City-wide		AM: Confirm the definition of 'redundant community facilities' and guidance for how applicants and proposals would need to demonstrate or mitigate this.		
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	?	?	?	I	P	Local	R: Bristol's population and household within deprived areas. AG: As above.	n/a		
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	I	P	Local	R: Bristol's population and household within poor health areas. AG: As above.	n/a		
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	?	?	?	I	P	Local	R and AG: Bristol's population and households.	n/a		
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	-/?	-/?	-/?	D	P	City-wide	R and AG: Bristol's businesses.	AM: Provide greater definition or criteria which demonstrates land is 'underused' within an Industry and Distribution Area. AM: Provide greater definition about the circumstances where it could be acceptable for community-led housing to be permitted at sites subject to 'new workspace within mixed use development'.		
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	?	?	?	I	P	Local	R and AG: Bristol's population and households, and local businesses.	n/a		
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	D	P	Local and City-wide	R and AG: Cultural heritage; historic environment.	AM: Consider including being 'in accordance with other policies in the local plan' or providing additional requirements for design codes or heritage-led masterplans to mitigate any negative effects on historic environment or setting.		
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	-/?	-/?	-/?	D	P	Local and City-wide	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; local wildlife.	AM: Provide a requirement for a net gain in biodiversity; CR: Policies to conserve and enhance the natural environment.		
Transport and Movement	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	-/?	-/?	-/?	D	P	Local and City-wide	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; local wildlife.	AM: The 'scale appropriate to the location' and the 'level of local need identified' should be defined so it is clear what would deem the loss of ROS acceptable.		
	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	?	?	?	I	P	Local and City-wide	R: Bristol's population and natural environment. AG: Commuters and businesses.	AM / CR: Provide updated guidance on levels of parking provision, particularly for retained allocations beyond easy walking distance of services.		
	14. To maintain and improve the existing highway network	DMC30 DMC31	?	?	?	I	P	Local and City-wide	R: Bristol's population and natural environment. AG: Commuters and businesses.	n/a		
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	I	P	Local and City-wide	R and AG: Bristol's households and population.	n/a		
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		
	17. Minimise air and noise pollution	DMC38	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		

Evaluation of Effects	<p>Rank Score: 1 – This Option could have significant, longer term benefits for enabling alternative methods of delivery, including community-led and self-build (Objective 1, DMC4). However, without appropriate mitigation or further guidance, this could be at the expense of redundant community facilities, underused land within IDAs, sites supporting new workspace within mixed use development and Reserved Open Spaces.</p> <p>Scale of effects: Given the policy option targets specific site allocations, a proportion of larger schemes and a proportion of the Growth and Regeneration areas, the positive effects of this policy could be felt both locally and city-wide. However, minor negative effects may also be felt where community-led and self-build is permitted on redundant community facilities, underused land within IDAs, sites supporting new workspace within mixed use development and Reserved Open Spaces.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This Option could have longer term positive effects for enabling alternative methods of delivery, including community-led and self-build (Objective 1, DMC4). Whilst self-build and community-led schemes can often be more affordable than the cost of a market home, as these typically do not include ‘developer profit’ in the same way that traditional-build viability does, there is no policy-requirement to ensure these types of schemes or provision of service plots are affordable. Indeed, providing exceptions for the provision of affordable homes could result in these schemes contributing less overall to affordable homes provision. It is therefore recommended that the exception to provision of affordable homes is based on development value compared to market homes. • Whilst the overarching emphasis of this Option is not directed towards the reuse or regeneration of land, by not prescribing target densities and encouraging community-led exception sites on Reserved Open Spaces, this could directly reduce opportunities for the re-use or regeneration of previously developed land and an increase in density. Alongside adding reference to ‘in accordance with other policies in the Local Plan’, the ‘scale appropriate to the location’ and the ‘level of local need identified’ should be defined so it is clear what would deem the loss of ROS acceptable. • For a number of Objectives, namely Objective 3 DMC8 (access to key services), Objective 5 DMC10 and 11 (reducing inequality in areas of concentrated disadvantage), Objective 6 DMC14 (encouraging walking and cycling), Objectives 7 DMC16 (educational services) and Objective 9 DMC22 and DMC23 (access to retail services) the effects will depend on the location of the proposed sites within the City. • Community-led housing could result in a gain of community facilities (Objective 9) and therefore result in minor beneficial effects. However, as this option allows for the re-use of ‘redundant community facilities’ for homes, the option may not result in an overall net gain. Subject to the definition of ‘redundant community facilities’ the overall effect could be neutral. • Whilst the option may generate employment opportunities for small and medium enterprise house-builders (DMC18 and DMC19), this option could result in the loss of underused land or sites within Industry and Distribution Areas or sites which could benefit from ‘new workspace within mixed use development’. This may have a direct overall negative impact when assessed against Objective 8, DMC17. • Assessment against Objective 10 is uncertain at this stage, and will be based both on the site characteristics and the ability for self-build and community-led schemes to sympathetically respond to either the historic and/or landscape character. Appropriate mitigation may include being ‘in accordance with other policies in the local plan’ or providing additional requirements for design codes or heritage-led masterplans. • The effect of this Option on Objective 11 and 12 could be potentially directly negative as community-led housing or self-build homes may be permitted on Reserved Open Space designations provided the proposal is demonstrably supported by the local community and no deficiency of open space will result. As Reserved Open Space could include allotments, educational sites, sports pitches, townscape features and churchyards, this could result in a loss of green infrastructure and therefore an overall minor negative effect when assessed against these objectives. Addition of a requirement to provide a net gain in biodiversity may deliver some appropriate mitigation. • The effect on Objective 13 and 14 is likely to be unclear, and dependent on the location of the proposed site and effects on parking. Cross-reference should be made to levels of parking for self-build or community-led housing. • For SA Objective 15, the effects of this Option are uncertain and are dependent on the location of the proposal. Appropriate mitigation may include being ‘in accordance with other policies in the local plan’.
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Draft Policy H6 Homes in multiple occupation and other shared housing

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to homes in multiple occupation and other shared housing						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	+/?	+/?	+/?	D	P	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	AM: Set out evidence to support the justification for 10% of the housing stock representing a 'harmful concentration' and this option meets the needs of all communities within the City.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	?	?	?	I	P	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	n/a
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	Both	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	MB/CR: Health and Wellbeing; and Design and Conservation policies, to ensure delivery of high-quality spaces and liveable environments. This could include a broader reference to the definition of 'healthy place' within the context of this type of development, as set out in updated PPG and the National Design Guide (Guidance under 'H1 Healthy, comfortable and safe internal and external environment').
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	+/?	+/?	+/?	I	P	Local and City-wide.	R: Cultural heritage; built environment; AG: Bristol's population.	n/a
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	Both	Local and City-wide.	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	n/a
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	D	Both	Local and City-wide.	As above.	n/a
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	I	Both	Local; City-wide.	As above, plus R: Bristol's highway network.	n/a
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	CR: Flood risk policies.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	CR: Climate Change Policies in relation to the requirements for a waste strategy.
	17. Minimise air and noise pollution	DMC38	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	n/a
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	n/a

Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would set out additional criteria for the development of houses in multiple occupation (HMO) and other shared housing. It would incorporate a new quantitative definition of ‘harmful concentration’ based on spatial threshold applied to proposed development sites. Under this policy option, development proposals for both new and intensified HMOs will not be permitted where development would result in over 10% of the total dwelling stock within approximately 100 metres of the site (including the proposal) being classified HMO or other shared housing.</p> <p>Scale of effects: The policy would form a material consideration for any development proposals for HMOs that require planning permission – which include all large HMOs in most areas and both small and large HMOs⁵⁸ in any areas covered by a relevant Article 4 Direction (A4D). It would not relate to conversion of existing residential housing stock (Use Class C3) to HMOs (C4) under permitted development rights (PDR) outside the city’s defined Article 4 Direction (A4D) areas, including the wards of Ashley, Cabot, Clifton West, Clifton East, Cotham, Lawrence Hill and Redland; and recently, within areas of Avonmouth Village, North Bristol, South Bristol and East Bristol⁵⁹.</p> <p>Effects of this policy are therefore likely to be site-specific (including existing HMOs and other forms of shared housing) and localised, being attributable to the immediate street or defined neighbourhood. However, this would also generate city-wide effects where the development of HMOs and other shared housing is undertaken as set out above.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This policy option could generate minor positive effects for SA Objective 1 (DMC1) as it seeks to enable the sustainable delivery of HMOs and other shared housing, which would respond to needs of different communities within Bristol (such as students and young professionals). In addition, by setting out city-wide criteria for development proposals which address residential amenity and local character, this option is considered to support balanced delivery of an appropriate mix of housing types, without resulting in significant harm to existing communities or restricting housing choice of other needs groups (DMC3). Whilst HMOs do form an important part of affordable housing supply, and as this policy is restrictive, the degree to which this policy option would contribute to provision of affordable housing (DMC2) is unknown and not significant. • This option relates to avoiding harmful impacts of concentrations of HMOs and other shared housing; however, it does not identify specific locations for such development. While the option includes a new threshold to prevent more development in already concentrated areas of existing HMOs, the degree to which it would support ‘Urban Living’ principles including the reuse of land, higher density development and avoiding development on greenfield land is based on the location and design. Therefore, the effects against SA Objective 2 are unknown overall. • Effects against SA Objective 6 are overall unknown and are considered to be somewhat reliant upon the implementation of other draft policies to deliver high-quality design that meets liveable space standards. However, this option could indirectly support positive well-being and good living conditions, by seeking to manage perceived issues associated with these forms of accommodation (DMC13). It is unclear how the implementation of this policy would affect local air quality or active travel (DMC12 and DMC14). • Effects on service provision (i.e. Objective 3 and 9) are not assessed further here. Whilst concentrations of HMOs could perceptibly have effects on local services, this is both indirect and uncertain. Positive effects could include revitalising of centres through concentrations of different age groups (such as students), whilst negative effects could include over-concentrations of specific types of service. As HMOs provide an important part of affordable supply for <u>all</u> communities, effects are potentially indirect, uncertain and non-applicable. • Proposals for new HMO development may have effects on the historic environment if they do not sympathetically respond to either: listed features at a building level (i.e. internal alterations); the historic and/or landscape character or setting. By including the general requirement that development proposals do not harm the character of the locality, and by including specific reference to ‘cumulative detrimental impact of physical alterations’, this option could protect the existing built environment and bring minor positive benefit for SA Objective 10. However, effects are dependent on implementation, so are also partly unknown. • Proposals for new HMO development may have effects on the natural environment, particularly where proposals do not conserve or enhance features of biological or geological value. Although retained policies are in place to minimise impacts on sensitive ecological receptors, the effects of this option for SA Objectives 11 and 12 are currently unknown and are dependent on implementation. • By setting out that development proposals would not be permitted where they would harm the reasonable accommodation of on-street parking or its regulation through parking control measures, it is considered that this option could enable minor positive effects for the existing local highway network (DMC30 and DMC31) and indirectly influence issues such as traffic management (DMC30). As with the wider impacts on built environment, the degree of effect is based upon design proposals and site-specific considerations, so is therefore partly unknown. • Effects of this option for SA Objective 15 are unknown as they remain dependent on the level of flood risk affecting the site and surrounds; flood risk projections based on the latest future climate change scenarios; and the design of development and outdoor space. Retained policies BCS16 and BCAP5 will continue to provide guidance to direct development away from areas of highest flood risk. • Against SA Objectives 16 and 18, effects of this option are also unknown, as development proposals may have wider impacts on local and/or city-wide water resources (DMC34) and localised waste production (DMC36). However, this is linked to factors including the intensification of development and its design (including water efficiency), the resilience of water supply across the Plan period, and waste management measures. The standard of sustainable design, energy efficiency and construction (DMC36; DMC39; DMC42) are unknown, as these are driven by other retained and draft plan policies. • This option could generate minor negative indirect effects for air quality (SA Objective 17 DMC38) through construction and operation stages, dependent upon the scale of development proposed and the siting of development. Overall effects are unknown and dependent upon the level of accessibility by active travel (i.e. walking and cycling) and public transport options, alongside other design considerations.
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⁵⁸ ‘Small’ HMOs are defined as 3-6 persons (under Use Class C4, as defined by the Town and Country Planning (Use Classes) Order 1987 (as amended)); and large HMOs (‘sui generis’) are those with six or more persons.

⁵⁹ Following public consultation on newly proposed A4Ds within the areas of Avonmouth Village, North Bristol, South Bristol and East Bristol, these were ratified by BCC and formal notice of the newly made A4Ds given on 3 July 2019. These new A4Ds are proposed to be enacted from June 2020.

Draft Policy H7 Managing the development of purpose-built student accommodation

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to purpose-built student accommodation						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	+/?	+/?	+/?	D	P	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	AM: Define 'proportion of affordable student housing' to meet need, and explicitly state the requirement for 'contribution to general purpose affordable housing' in line with the now withdrawn JSP Policy 3. MB: Consider whether 'defined locations' should make specific reference to include need arising from, accommodation provision for, all higher education establishments.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	+/?	+/?	+/?	D	P	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	AM: Revise mapping within Policy H7 so that this reflects 'defined locations' and 'other locations'.
	3. Ensure easy and affordable access to key services	DMC8	?	?	?	I	P	City-wide	R: Bristol's population and households. AG: As above, and Bristol businesses.	AM: Consider updating Infrastructure Delivery Plan setting out service requirements explicitly needed to accommodate uplift in student populations. MB: Consider a prescribed mix of uses on these sites (as part of 'active frontages') to ensure that there is less indirect effects on the range of local service provision.
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	Both	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	MB: Requirement for access to high-quality public or private outdoor space. MB: Given recent mental health issues associated with the city's higher education establishments, consider if further provisions could be made which safeguard or enhance positive well-being of future occupants (e.g. access to mental health infrastructure and inclusion of support services on-site or access to high-quality open, green space). Include a broader reference to the definition of 'healthy place' within the context of this type of development, as set out in updated PPG and the National Design Guide.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	?	?	?	I	P	City-wide	R and AG: Bristol's population and households.	n/a
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	n/a	n/a	n/a	n/a	n/a	n/a	n/a	AM: Proposed requirement for PBSA proposals sited within other locations to not result in harmful impact to commercial areas.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	?	?	?	I	P	Local	R and AG: Bristol's population and households, and local businesses	AM: Consider setting out prescribed quantum for a mix of use on PBSA sites.
	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide.	R: Cultural heritage; built environment; AG: Bristol's population.	CR: Include reference to existing and draft design and conservation policies.
Townscape and Landscape	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	Both	Local and City-wide.	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	CR: Reference need to conserve and enhance ecological networks.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	I	Both	Local and City-wide.	As above.	MB: Requirement for access to high-quality public or private outdoor space.
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	n/a
	14. To maintain and improve the existing highway network	DMC30 DMC31	n/a	n/a	n/a	n/a	n/a	n/a	n/a	AM: Requirement for proposals to have a clear parking management plan in agreement with the universities to reduce impact on local highways. AM: Modelling impact of proposed developments.
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	n/a
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	CR: Climate Change Policies in relation to the requirements for a waste strategy.
	17. Minimise air and noise pollution	DMC38	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	n/a
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	n/a

Evaluation of Effects	<p>Rank Score: 1 – This Option would set out additional development management principles in respect of PBSA to ensure growth of such development is both consistent with the anticipated growth of the student population within the city and other planning policies seeking to avoid adverse impacts on existing residential communities. The option would introduce defined locations for PBSA development, including within Growth and Regeneration Areas (GRA), and would specify maximum indicative capacities for total bed spaces. It would also set out general requirements and provisions for PBSA proposed elsewhere to ensure a good standard of accommodation in accordance with other policies in the plan.</p> <p>Scale of effects: Effects of this policy are likely to be site-specific and localised, being attributable to the immediate neighbourhood or wider Growth and Regeneration Area. However, by encouraging PBSA development to come forward in appropriate locations would have dual city-wide benefits of encouraging students to study in Bristol whilst preventing harmful impacts on residential areas.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This option could generate a minor positive effect for SA Objective 1 (DMC1) as it seeks to enable the sustainable delivery of PBSA, which would specifically respond to the needs of the growing student community within Bristol. By setting out city-wide criteria for development proposals that address residential amenity, this policy could safeguard existing residential communities from the effects of growth of student populations while expanding city-wide provision of student accommodation (DMC3). In addition, by requiring that development proposals in ‘other locations’ be mixed-use residential, this could further ensure delivery of sustainable, mixed communities. Whilst it is a requirement for developments within the defined locations to provide a proportion of affordable student housing and for Use Class C3 proposals sited within ‘other locations’ to contribute to affordable housing, in absence of JSP policies for affordable housing or in-text references to ‘proportion’ of affordable housing, assessment of this policy against DMC2 is uncertain. • By including ‘defined’ and ‘other locations’ for PBSA, this option is considered to produce minor positive effects for SA Objective 2 (DMC5) as it could help unlock brownfield land and deliver higher densities within the urban area (DMC7). This policy could also therefore direct growth towards more sustainable locations (DMC6). Capacities are, however, upper limits rather than lower thresholds and therefore the final density would be based upon site specific considerations. • For Objective 3 (DMC8) and Objective 9 (DM23), this option may have uncertain but complex effects. Concentrations of PBSA could change the service and retail offer within an area, as these require services which are predominantly targeted at students. By targeting defined locations for PBSA within the city or requiring these uses to form part of mixed-use development with active ground floor uses where appropriate, this option does seek to preserve a diversity of uses within commercial areas. However, as there is no prescribed quantum for mix of uses, concentrations of student accommodation could locally change the service or infrastructure offer. • Health-related effects of this policy option are largely unknown; however, this option may introduce potential benefits for local air quality (SA Objective 6, DMC12) through the requirement for PBSA to be car-free, alongside management measures to deter future occupants from parking cars elsewhere in the city. Other public health effects of this option, including the well-being of future occupiers related to the standards / quality of accommodation and access to green or open amenity space (DMC13), would remain uncertain and based on implementation, alongside site-specific considerations. • By locating defined sites for PBSA within the City Centre and in close proximity to existing University of Bristol facilities, this option could have indirect, minor positive effects for Objective 7 (DMC16) in that it could ensure that higher education is located within relatively easy walking distances of accommodation. The extent to which the option will benefit University of West of England students (with a campus in South Gloucestershire) is unclear, however general provisions require PBSA development to be car-free and deter occupants from the parking of cars elsewhere in the city. Effects are therefore overall unclear. • Proposals for new development may have effects on the historic environment if these do not sympathetically respond to or conserve either: listed features at a building level or the historic and/or landscape character or setting. Whilst retained policies are in place to minimise impacts on sensitive historical receptors (i.e. BCS22, DM31), the effects against SA Objective 10 are therefore currently unknown and are dependent on site-specific considerations and the degree of mitigation proposed. • Defined locations for PBSA are considered to be those that would encourage sustainable transport and active travel, which could produce positive effects for SA Objective 13 (DMC28); however, this effect would vary on a site-by-site basis for other locations based on existing accessibility, design and other site considerations. Effects against this Objective are therefore also partly unknown. • As set out above, this policy option could generate unknown, minor potential benefits for air quality (SA Objective 17). This option could generate minor negative indirect effects for air quality (SA Objective 17 DMC38) through construction and operation stages, dependent upon the scale of development proposed and the siting of development. • Effects are considered to be the same as Draft Policy H6 for SA Objectives 11-12, 15 and 18, and as such, are not repeated further in this section.
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Draft Policy H8 Older peoples' and other specialist needs housing

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to older peoples' and other specialist needs housing							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	+/?	+/?	+/?	D	P	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	AM: Provide evidence for the '60 dwelling' requirements, the requirement to provide a minimum of 10% affordable housing, and where the minimum level of dwellings to be wheelchair accessible.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	?	?	?	I	P	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	n/a
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	D	P	Local	R: Bristol's local economy; Bristol's transport network; AG: Local services; Bristol's population.	MB: Requirement for proposals to be located within easy walking distance of development (e.g. 400m).
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage 6. To reduce health inequalities and promote healthy lifestyles across the city	DMC10 DMC11	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
		DMC12 DMC13 DMC14	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	MB: Ensure requirement for proximity to accessible public/private green spaces, alongside extending accessibility requirement to any provision of private outdoor amenity space and/or wheelchair parking or cycle storage. MB: Updated PPG ⁶⁰ sets out that inclusive design should not only be specific to the building, but also include the setting of the building in the wider built environment, for example, the location of the building on the plot; the gradient of the plot; the relationship of adjoining buildings. Include a broader reference to the definition of 'healthy place' within the context of this type of development, as set out in updated PPG and the National Design Guide.
		DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Economy and Employment	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local and City-wide.	As above.	n/a
	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide.	R: Cultural heritage; built environment; AG: Bristol's population.	n/a
Townscape and Landscape	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	Both	Local and City-wide.	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	n/a
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	I	Both	Local and City-wide.	As above.	n/a
	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	n/a
Climate, Energy and Waste	14. To maintain and improve the existing highway network	DMC30 DMC31	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	n/a
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	n/a
	17. Minimise air and noise pollution	DMC38	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	n/a
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	n/a

⁶⁰ Paragraph: 017 Reference ID: 63-017-20190626 and Paragraph: 018 Reference ID: 63-018-20190626

Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would introduce updated policy in relation to the delivery of a range of older people’s and specialist needs housing options across the Plan area. It sets new requirements for provision of on-site affordable housing, where proposals for 60 dwellings or more should provide a minimum of 10% affordable specialist older people’s housing. Specific criteria are outlined for development to abide by, addressing the site accessibility. Thresholds for dwelling compliance with Building Regulations M4(3) and M4(2) is also sought by the policy.</p> <p>Scale of effects: Effects of this policy are likely to be site-specific and localised, being attributable to the immediate street or neighbourhood; however, these would also generate city-wide effects where the development of older peoples’ and specialist needs housing is undertaken across Bristol.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This option could generate minor positive effects for SA Objective 1 as it seeks to enable the sustainable delivery of older people’s and other specialist needs housing, which would specifically respond to the needs of these particular groups within Bristol (DMC1; DMC3). By requiring that specialist older people’s housing developments comprising 60 dwellings or more should provide a minimum of 10% affordable specialist older people’s housing delivered on-site, it is considered that this option could produce minor positive benefits for DMC2; however, the degree of affordable housing unlocked via this policy clearly remains dependent upon proposals being above this capacity threshold, and therefore, effects are also unknown. • As this policy option does not specifically set out the location of residential development under these categories, effects against SA Objective 2 are unknown overall. It is assumed that development proposals (particularly where proposed within the GRAs) would be informed in part by the ‘Urban Living’ approach set out in the Draft Local Plan, which would encourage reuse of brownfield land over development of greenfield sites. However, effects of this policy against SA Objective 2 are unknown at this stage. • Given that this policy option seeks primarily to deliver specialist older people’s housing that includes a range of care and support services, it is considered that effects against SA Objective 6 would likely be minor positive, as it could improve both the quantity and quality of existing provision of care within the city. As this option includes aims for development to be well-located with respect to local services and open space, it could contribute to maintaining healthy lifestyles and positive well-being of occupants (DMC13; DMC14). Other public health effects of this option, including for future occupier well-being related to the standards / quality of accommodation and the specific level of access to green or open amenity space (DMC13) would remain uncertain and based on delivered design, alongside site-specific considerations, and therefore, effects are also partly unknown. • This policy option could generate minor positive effects for SA Objectives 3 and 9, as it encourages development proposals to be sited close to shops, services and community facilities appropriate to the needs of the intended occupiers (DMC8; DMC23). This option could therefore support the wider vitality and viability of local / retail centres (DMC22). By development proposals required to be sited close to shops, this could also encourage a demonstrable modal shift towards more inclusive accessibility (Objective 13). • Effects are considered to be the same as Draft Policy H7 for SA Objectives 10-12, 15-18, and as such, are not repeated further in this section. • This option could generate minor negative indirect effects for air quality (SA Objective 17 DMC38) through construction and operation stages, dependent upon the scale of development proposed and the siting of development. Overall effects are unknown and dependent upon the level of accessibility by active travel (i.e. walking and cycling) and public transport options, alongside other design considerations.
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Draft Policy H9 Accessible homes

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to accessible homes							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	+/?	+/?	+/?	D	P	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	AM: Provide evidence for optional technical standards, including the proportion of at least 10% of new-build housing in proposals.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	CR: Updated PPG in relation to securing inclusive design.
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	Both	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	CR: Updated PPG in relation to securing inclusive design. MB: Updated PPG ⁶¹ sets out that inclusive design should not only be specific to the building, but also include the setting of the building in the wider built environment. Therefore, this should include: location of the building on the plot; the gradient; relationship of adjoining buildings; and transport infrastructure.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a – as this policy relates to internal and minor external building regulations, delivered as part of wider design, which is directed by other policies.
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26 DMC27	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a – as above. MB: Extend accessibility requirement to any provision of private outdoor amenity space and/or wheelchair parking or cycle storage.
Transport	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC28 DMC29 DMC30 DMC31	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC32 DMC33	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a – siting of development proposed would be in accordance with retained policy BCAP.
Climate, Energy and Waste	14. To maintain and improve the existing highway network	DMC34 DMC35 DMC36 DMC37	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a – as this policy relates to internal and minor external building regulations, delivered as part of wider design, which is directed by other policies.
	15. To reduce the risk of flooding from all sources	DMC38 DMC39 DMC40 DMC41 DMC42	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC38 DMC39 DMC40 DMC41 DMC42	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Climate, Energy and Waste	17. Minimise air and noise pollution	DMC38 DMC39 DMC40 DMC41 DMC42	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC38 DMC39 DMC40 DMC41 DMC42	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

⁶¹ Paragraph: 017 Reference ID: 63-017-20190626 and Paragraph: 018 Reference ID: 63-018-20190626

Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would set out new accessibility criteria for all new residential development and would accord with Building Regulations M4(2) and Building Regulations M4(3).</p> <p>Scale of effects: Effects of this policy option would be limited to the building and site in which development is located. While this option forms part of the Local Plans’ aims to secure a fairer, more inclusive city, it is unlikely that this option in and of itself would produce significant city-wide effects.</p> <p>Social, economic and environmental effects: As set out above, the effects of this option are likely to be relatively limited in scope, and this is reflected in the assessment matrix above. Where potential effects against SA Objective are identified, these are set out below:</p> <ul style="list-style-type: none"> • By setting out accessibility thresholds that would require development to ensure safe accessibility in accordance with Building Regulations, this policy option could support the delivery of an appropriate mix of types of housing to meet the identified needs of all communities within the city, including disabled persons (DMC1; DMC3). However, inclusion of these standards may introduce viability concerns for some development sites or proposals, which may have implications for capacity and delivery of affordable housing units (DMC2). It is also unclear how this policy could impact the ability to deliver housing through alternative methods, including community-led and self-build (DMC14). • This option seeks to ensure safe and inclusive access, which could enhance the liveability standard of development for specific needs groups. However, the public health effects of this option, including the well-being of future occupiers related to the standards / quality of accommodation and the specific level of access to green or open amenity space (DMC13) would remain uncertain and based on delivered design, alongside site-specific considerations. Therefore, effects against SA Objective 6 are unknown overall. • SA Objectives 2-5 and 7-18 are not considered applicable to this policy option, as criteria under these objectives relates to the development design to which the accessibility standards would be applied and the operation of other draft policies.
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Draft Policy H10 Planning for traveller sites

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to planning for traveller sites						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/- / ?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	+/?	+/?	+/?	D	P	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	AM: Set out a supply of gypsy, traveller and travelling showpeople sites and sufficient sites for a settled community. MB: Identify sites that could provide mixed-residential and business uses (Policy F, Planning Policy for Traveller Sites).
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	?	?	?	I	P	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	CR: Include NPPF provisions in relation to maintaining openness of the Green Belt (paras 143-147). CR: Policy E: Traveller sites in Green Belt of Planning Policy for Traveller Sites (paras 16, 17). MB: Include criteria for effective use of previously developed (brownfield) or derelict land within development management (para 26, Planning Policy for Traveller Sites).
	3. Ensure easy and affordable access to key services	DMC8	+	+	+	D	P	Local	R: Bristol's local economy; Bristol's transport network; AG: Local services; Bristol's population.	AM: Ensure access to appropriate health services and education for this defined community group.
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	MB: Whilst this option would not likely deliver a net gain in community or service facilities (SA Objective 4, DMC9), the role of travelling showpeople for local culture could be acknowledged.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	n/a	n/a	n/a	n/a	n/a	n/a	n/a	AM: Ensure access to appropriate health services and education for this defined community group.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	Both	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	MB: Promoting opportunities for healthy lifestyles, including adequate landscaping and play areas for children (para 26, Planning Policy for Traveller Sites).
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	AM: Ensure access to appropriate health services and education for this defined community group.
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide.	R: Cultural heritage; built environment; AG: Bristol's population.	n/a
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	Both	Both	Local and City-wide.	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	n/a
Transport	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	D	Both	Local and City-wide.	As above.	AM: Requirement for sites to be soft landscaped to positively enhance the environment and increase its openness (para 26, Planning Policy for Traveller Sites).
	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Climate, Energy and Waste	14. To maintain and improve the existing highway network	DMC30 DMC31	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	AM: Ensure that such sites are not located in areas at high risk of flooding, given the high vulnerability of caravans.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	n/a
	17. Minimise air and noise pollution	DMC38	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	n/a
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	n/a

Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would set out a revised approach to the delivery of development related to traveller sites, in line with updated national policy guidance and definitions. While an assessment to determine the locally specific needs for traveller sites is pending, the draft policy sets out provisions for proposals for residential pitches for travellers or plots for travelling showpeople. These include accessibility and acceptability of living conditions, alongside additional requirements that proposals will need to regard, such as availability of alternative accommodation for applicants.</p> <p>Scale of effects: Effects of this policy are likely to be site-specific and localised, being attributable to the immediate area within which residential pitches or plots are sited; however, there is potential for city-wide cumulative effects where additional sites for travellers are identified and delivered.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This option could generate minor positive benefit effects for SA Objective 1 (DMC1) as it sets out an approach to the development of residential pitches and/or plots to meet the needs of the travellers or travelling showpeople within Bristol. By setting out city-wide criteria for development proposals that address residential amenity; and requiring that development provides no ‘demonstrable harm’ to the living conditions of the settled community, this policy could safeguard existing residential communities while ensuring inclusivity (DMC3). • Effects of this policy option against SA Objective 2 are largely unknown, as it is currently unclear of the extent to which this policy would safeguard greenfield sites across the city. While inappropriate development within the Green Belt is addressed within national policy (the NPPF and Planning Policy for Traveller Sites), it is unclear at this stage where development will be located. • The policy option could generate minor positive effects for SA Objective 3 (DMC8), as while accessibility distances are not defined, the policy includes the requirement for proposals to be located and designed in order to enable access to local services and facilities e.g. GP, post office, community centres. • By requiring that development proposals provide acceptable living conditions for the future occupiers of the site, alongside safe pedestrian and cycle access, it is considered that this option could generate minor positive benefits for SA Objective 6 (DMC13 and DMC14). It remains unclear the degree to which this policy option would ensure positive well-being and healthy lifestyles of this community group, although this would be partly addressed by ensuring access to community services and facilities (interlinking with SA Objective 3); therefore, effects are uncertain overall. • Effects are considered to be broadly the same as earlier policies for Objectives 10 - 18, are not repeated further in this section. The policy should ensure consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers.
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Draft Policies E1 – E8: Assessment of effects of draft employment policies

Economy

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

Based on the SA Scoping Report 2018 and Update Note, key current sustainability issues identified prior to the Covid-19 pandemic are identified as:

- Pressure on city centre land to meet the needs of commercial and residential space.
- 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 year⁶².
- Bristol has the highest employment rate of the Core Cities, and productivity was also higher than other Core Cities. The employment rate has been broadly increasing for the last 12 years, from 72% in 2004/05 to 77% in 2016/17⁶³. Bristol is known for innovation (ranking first out of the Core Cities for number of patent applications per capita⁶⁵), high tech industries and the arts.
- However, the Inclusive and Sustainable Economic Growth Strategy (2018) identifies that there are a number of challenges to address, including persistent concentrations of deprivation and earnings inequalities, which are reflected in the city's relative underperformance in education and skills, together with other factors creating pay gaps. As an example, parts of Avonmouth Village increased from the top 40% most deprived to the 30% most deprived between 2015 and 2019; this indicated that Health Deprivation and Disability decreased in the northern portion of the village area, whilst Living Environment decreased in the southern portion⁶⁶.
- Perception amongst employers interviewed within the Business West Skills and Training Survey 2018 and Avonmouth & Severnside Enterprise Area Survey 2017, that lower skilled jobs in the logistics sector are becoming increasingly hard to fill⁶⁷.
- The West of England EDNA (2016)⁶⁸ set out the implications of recent trends on supply. This is covered in detail within the assessment of Strategic Reasonable alternatives, and includes: 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. Reflecting the content of the Strategic Economic Plan prepared by West of England LEP, the employment strategy within the JSP saw strategic employment growth focussed on promoting the growth of existing employment centres (including the Enterprise Zone and Enterprise Area), making best use of land and intensifying economic activity.
- Bristol City Centre, the Temple Quarter Enterprise Zone, Avonmouth Severnside Enterprise Area and Bristol Port were identified as strategic employment growth locations.

⁶² ONS data, within the Inclusive and Sustainable Economic Growth Strategy (2018)

⁶³ Bristol Economic Briefing 2019:

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

⁶⁴ Inclusive and Sustainable Economic Growth Strategy (September 2018):

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

⁶⁵ Centre for Cities from PATSTAT; Intellectual Property Office, Patent published by postcode, detailed within the Inclusive and Sustainable Economic Growth Strategy (September 2018)

⁶⁶ Indices of Deprivation: 2019 and 2015, from: http://dclgapps.communities.gov.uk/imd/iod_index.html#

⁶⁷ https://www.businesswest.co.uk/sites/default/files/distribution_lss_2019_final_for_web.pdf and

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

⁶⁸ SD15B West of England Economic Development Needs Assessment (EDNA) (2016)

- McKinsey & Co with the Centre for Cities found Bristol as having the only fast growing, globally-significant technology cluster in the UK (outside London)⁶⁹. However, Ofcom's Connection Nations Report from 2018⁷⁰ identified pockets of poor superfast broadband availability across the city centre, with particular shortfalls around St Philips Marsh, Barton Hill, Upper Easton, Fishponds, St George, Bedminster, Brislington, Westbury on Trym and Shirehampton.

A detailed review of sustainability issues and change in national policy context is set out within the assessment of strategic reasonable alternatives for employment land.

Policies under 'Economy' of the Draft Local Plan are set out in Table 5. The grouped policies under 'Economy' seek to directly meet the requirements of the following Local Plan Objective: 'Enable growth of our economy for everyone, with modern workplaces and digital infrastructure fit for the future'. The Draft Local Plan makes it clear that the rationale for the introduction of new Economy policies are broadly as follows:

- Support delivery of employment land strategy and Local Plan aims for sustainable and inclusive economic growth across the city;
- Support development of new workspace alongside retention of core industrial land; and
- Increase digital connectivity to enable access to employment opportunities, meet the requirements of modern business needs and attract investment into Bristol.

In the Draft Local Plan, new policies proposed would replace the existing policies in relation to the economy and employment, specifically Policy BCS8 of the Core Strategy and Policies DM12 and DM13 of the SADMP, which guide development proposals affecting employment land outside of and within the city's PIWAs.

Table 5 Relationship with other relevant plans and programmes

Draft Policy	NPPF	Other Legislation / Guidance	Retained Policies	Evidence
Draft Policy E1: Inclusive economic development	Paras 80 – 82; Paras 103, 104 (a).	Planning (Listed Building and Conservation Areas) Act 1990.	<ul style="list-style-type: none"> • Policy BCAP6: Delivery of employment space in Bristol City Centre • Policy BCAP12: Vacant sites and temporary uses • Policy BCAP8: Maritime industries 	Economic Development Needs Assessment (2015) ⁷¹ .
Draft Policy E2: Employment land strategy				
Draft Policy E3: Location of office development				
Draft Policy E4: Industry and Distribution Areas				
Draft Policy E5: Avonmouth Industrial Area and Bristol Port				
Draft Policy E6: Protecting living conditions in Avonmouth village				
Draft Policy E7: New workspace within mixed use development				
Draft Policy E8: Digital connectivity and inclusion	Paras 112-116			

⁶⁹ McKinsey & Co with the Centre for Cities, explored further within Inclusive and Sustainable Economic Growth Strategy (September 2018)

⁷⁰ https://www.ofcom.org.uk/__data/assets/pdf_file/0017/113543/Connected-Nations-update-Spring-2018.pdf

⁷¹ <https://www.bristol.gov.uk/documents/20182/33167/Economic+Development+Needs+Assessment/8f752a6b-84a3-9be4-2ae4-aea41710ee99>

Stage 2: Identify and describe realistic alternatives

In light of the above discussion, alternatives considered for each of the draft policies under the 'Economy' Policy Theme are set out and elaborated in turn below. Where appropriate, these also draw on conclusions made for the assessment of strategic reasonable alternatives.

Draft Policy E1: Inclusive economic development

Option 1 No new policy in relation to E1

This option is effectively a 'policy off' alternative. However, as this as Draft Policy E1 introduces a new policy concept, the principles of this draft policy would only be achieved loosely through the Retained Policy BCAP6 Delivery of Employment Space and the council's Supplementary Planning Document on planning obligations.

Since the current development plan was adopted, there has been a change in overarching strategic direction towards achieving more inclusive growth within Bristol. This is reflected within the Inclusive and Sustainable Economic Growth Strategy (2018) that seeks to ensure 'productivity-driven growth together with the fair distribution of economic contributions and benefits'⁷². Given the sustainability issues set out within the introduction and the principles established within the Inclusive and Sustainable Economic Growth Strategy, a 'policy off' option without an aligned retained policy was not considered a reasonable alternative.

Option 2 Introduce new policy in relation to Inclusive Economic Development

This option would introduce a new policy in relation to supporting growth which is inclusive and offers opportunity to all. This option requires development proposals to contribute to enabling access to employment and removing barriers to employment for local residents, facilitating skills development and supporting employment initiatives in three circumstances:

- New homes are developed on sites previously used for business development; or,
- New workspace and other commercial development is created; or,
- Other major development arises which would generate new employment including during the construction phase.

This option would apply to development sites involving the development or redevelopment of sites within 1,000m² of commercial or other employment generating floorspace. It is also applicable to residential developments of 100 homes or more.

The overarching purpose of this policy is to ensure that, where workspace is redeveloped, new business development is constructed or major development generate employment requirements, that the policy facilitates access to new jobs created and enables skills matching to take place. This assists in mitigating development impacts on the community and ensures that the benefits of economic development are available to the communities in which it is located.

⁷² Inclusive and Sustainable Economic Growth Strategy (2018)

Reasonable Alternative	Yes
Rationale	Recent pre-pandemic trends indicate that whilst economic growth has been strong within Bristol, in terms of the employment rate and productivity, the effects have not been consistently felt. Indeed, there areas of deprivation, demographics and sectors which have actually decreased during this period of growth.
Recommendations for Evidence Update	<ul style="list-style-type: none"> • Published Employment Strategy, as set out within the Inclusive Growth Strategy. • The EDNA (2016) and job forecasts and employment land requirements will need to be updated in light of Brexit, the new Local Industrial Strategy and COVID-19.

Alternatives could also relate to thresholds of amounts of employment generating floorspace or scales of residential developments.

Draft Policy E2: Employment land strategy

As this policy represents the employment land strategy and distribution of employment growth within the city, this has been assessed within the reasonable alternatives (within the main report Section 5) and therefore it is not necessary to repeat the assessment here.

Draft Policy E3: Location of office development

Option 1 No new policy in relation to E3

This option would effectively represent a ‘policy off’ alternative, whereby there would be a reliance on Policy BCS8 ‘Delivering a Thriving Economy’. This policy is not proposed to be retained within the new Local Plan Review.

The EDNA (2016) identified that in the 10-year period 2006/7-2015/16, 191,292sq m of new B1a office floorspace was completed in the city centre. In the same period, there was also a loss of 174,131sq m of city centre office floorspace, predominantly in second-hand stock for conversion to residential accommodation. In addition, reflecting the content of the Strategic Economic Plan prepared by West of England LEP, the employment strategy within the JSP saw strategic employment growth focussed on promoting the growth of existing employment centres (including Enterprise Zone and Enterprise Area), making best use of land and intensifying economic activity. Bristol City Centre and the Temple Quarter Enterprise Zone, amongst other locations, were identified as strategic employment growth locations.

Given the change in current situation, a policy-off alternative was not considered to be a realistic alternative.

Option 2 New policy is relation to office development

Recognising that Bristol is the core commercial centre in the south west region, this draft policy option would result in the development of office stock within major focusses at Bristol Temple Quarter, Harbourside and Redcliffe, with smaller clusters across the City Centre.

The draft policy identifies that developments will be appropriate in principle at:

- Bristol City Centre, including Bristol Temple Quarter (Draft Policy DS2 ‘Bristol Temple Quarter’) and at appropriate locations in St. Philip’s Marsh (Draft Policy DS3 ‘St. Philip’s Marsh’);
- Town and district centres and on the edge of these centres (Retained Policy BCS7 ‘Centres and retailing’);
- Areas of growth and regeneration as part of mixed used developments;
- Areas identified as suitable for office development in other policies in the plan.

In addition to the above, smaller scale development for offices/flexible workspace will be appropriate as part of mixed use redevelopment of former business, industrial and distribution sites.

Reasonable Alternative	Yes
Rationale	To ensure conformity with the strategic policy direction of March 2019, the employment strategy within the JSP saw strategic employment growth focussed on promoting the growth of existing employment centres (including Enterprise Zones and Enterprise Area), making best use of land and intensifying economic activity. Bristol City Centre and the Temple Quarter Enterprise Zone, amongst other locations, were identified as focuses for employment.
Recommendations for Evidence Update	<ul style="list-style-type: none"> • Published Employment Strategy, as set out within the Inclusive Growth strategy. • The EDNA (2016)and job forecasts and employment land requirements (by sector) will need to be updated in light of Brexit, the new Local Industrial Strategy and COVID-19.

Draft Policy E4: Industry and Distribution Areas

Option 1 No new policy in relation to E4

This option would effectively represent a ‘policy off’ alternative, whereby there would be a reliance on Policy BCS8 ‘Delivering a Thriving Economy’. This policy is not proposed to be retained within the new Local Plan Review.

A recognised sustainability issue that has been exacerbated since the adoption of the Core Strategy and Site Allocations and Development Management Policies Plan, is an increasing pressure on city centre land to meet the needs of commercial and residential space.

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

‘The clear priority for the development of brownfield land in the urban areas of the West of England will provide the opportunity for increased homes and employment using vacant or underused land. Key sites available for an increase in employment activity or for the release to housing land from employment use within Bristol City, the urban edge of Bristol within South Gloucestershire, and within Weston–super-Mare and Bath will be identified through the new the Local Plans’⁷³.

⁷³ SD1A West of England Joint Spatial Plan Publication Document (November 2017)

This direction was informed by the Economic Development Needs Assessment (EDNA) (2016)⁷⁴. To ensure conformity with the JSP, the strategy within the March 2019 Consultation draft reflected this approach. A policy-off alternative specifically in relation to the location and amount of Industrial and Distribution Areas is therefore not considered at an individual policy level.

Option 2 Introduce new policy in relation to Industry and Distribution areas

This option would see the introduction of Draft Policy E4 'Industry and Distribution Area' which reserves 234 hectares of core industrial estates and areas exclusively for those uses. The vast majority of these sites are within South Bristol, where there are around 150 hectares allocated, and in East Bristol. Due to the strategic economic importance, this policy would ensure these sites are reserved for industrial and distribution uses to support a diverse and inclusive economy.

Most of these areas are of strategic scale and cater for the requirements of all sizes of businesses. In order to maintain opportunities for small and medium sized industrial and distribution businesses (B1b and c, B2 and B8 or similar activities which are sui generis), a number of small industrial estates with smaller scale units have also been identified. Developments for new forms of workspace, start-ups, micro businesses and space for social enterprises will also be encouraged within Industry and Distribution Areas, where they fall within Use Classes B1b B1c B2 B8.

A number of other uses are likely to be acceptable on Industry and Distribution Areas, subject to other relevant development plan policies. These include:

- Industrial or commercial training facilities;
- Community facilities;
- Specialised leisure uses which cannot be accommodated in centres because of their scale and / or operational impacts;
- Essential public utilities development; and
- Ancillary facilities and services which support the functioning of the Industry and Distribution Area including childcare facilities, small-scale retail uses, sandwich shops and cafés.

The other uses that the policy permits in these areas include uses which would support the functioning of the Industry and Distribution Area as well as uses which have particular locational requirements due to their larger size or operational needs and impacts. Such proposals would be subject to the sequential approach set out in Retained Policy DM7 'Town Centre Uses'.

Development involving the loss of industrial and distribution floorspace / land within the Industrial and Distribution Areas will not be permitted unless: it is one of the uses referred to above, or, uses are compatible with the character of the areas and would not adversely impact on the viability and continued operation of existing industrial uses.

The assessment of individual Industry and Distribution Areas is undertaken within Section XX of the Interim Sustainability Appraisal.

⁷⁴ Economic Development Needs Assessment (Atkins, 2015)

Reasonable Alternative	Yes
Rationale	To ensure conformity with the strategic policy direction of March 2019, the employment strategy within the JSP saw strategic employment growth focussed on promoting the growth of existing employment centres (including Enterprise Zones and Enterprise Area), making best use of land and intensifying economic activity. NPPF Paragraph 121 encourages authorities to support the use of retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the viability and vitality of local centre.
Recommendations for Evidence Update	Published Employment Strategy, as set out within the Inclusive Growth strategy. The EDNA (2016)and job forecasts and employment land requirements (by sector) will need to be updated in light of Brexit, the new Local Industrial Strategy and COVID-19.

Draft Policy E5: Avonmouth Industrial Area and Bristol Port

Option 1 No new policy in relation to E5

This option is effectively a ‘policy off’ alternative. Policy BCS4 Avonmouth and Bristol Port did identify the area as a priority area for industrial and warehousing development, however, this is not proposed to be retained within the Local Plan Review.

Since the adoption of this policy, there has been a significant change in the baseline situation at Avonmouth, with Avonmouth Severnside Flood Defences under-construction and proposals for wetland habitat creation for ecological mitigation. In addition, the employment and economic growth importance of the area has been recognised through the Strategic Economic Plan and subsequent Local Industrial Strategy. As a result of this change in baseline situation, a ‘policy off’ option was not considered a reasonable alternative.

Option 2 Introduce new policy in relation to the Avonmouth Industrial Area and Bristol Port

The Avonmouth / Severnside Enterprise Area was identified as an Enterprise Area by the West of England Local Enterprise Partnership in 2012, with ambitions to enable economic growth alongside other designated areas in the sub-region (the Temple Quarter Enterprise Zone and the Filton Enterprise Area). This area continues to be recognised within the West of England Local Industrial Strategy (2019) as a priority growth location which will play a major role in creating the right conditions for development of warehousing and storage, large scale distribution and environmental technologies⁷⁵. In addition, Bristol Port which is located within this area has consent for the construction of a deep sea container terminal.

Since the Core Strategy and Site Allocations and Development Management Policies development plan documents were adopted, works have also significantly progressed on the Avonmouth Severnside Enterprise Area ecological mitigation and flood defences projects. In 2019, a scheme was

⁷⁵https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/818989/1907_VERSION_West_of_England_Interactive_SINGLE_PAGES.pdf

approved to support the creation of 17km sea defences and at least 80 hectares of wetland areas for ecological mitigation, which includes creation of new wetland habitat at Hallen Marsh to help protect the internationally important bird species that live on the estuary.

The draft policy option would therefore allow for the retention, development and redevelopment of existing industrial land for industrial, distribution and energy and port related uses. Around 60 hectares of greenfield land adjacent to the existing industrial areas will also provide allocations for the development of industrial and distribution uses. This includes Land at Kings Weston Lane (north and southern areas); Land East of Chittinging Road; Land East of Packgate Road; and, Land south of Seabank Power Station. Allocating new sites which are currently undeveloped will help support continued growth within the area. The effects of each individual allocation is assessed within Section 5 of the Interim Sustainability Appraisal.

The area will also continue to provide a suitable location in principle for the development of large scale wind turbines.

Given the sensitive and constrained nature of this area, development will require appropriate mitigation to ensure that risks of flooding are appropriately addressed and does not increase flood risk elsewhere. In addition, development will be required to contribute appropriately towards the habitat mitigation measures proposed for Hallen Marsh. The draft policy seeks to ensure that land at Hallen Marsh will be reserved for habitat mitigation.

Detailed development considerations for these sites, including the approach to transport and access, will be included in a future version of this local plan.

Reasonable Alternative	Yes
Rationale	This policy option would respond to the NPPF requirement to have regard to the Local Industrial Strategy, encourage sustainable economic growth where businesses can invest and expand, and to address specific locational requirements of different sectors (such as port-uses, energy uses and distribution).
Recommendations for Evidence Update	<ul style="list-style-type: none"> • Provide additional detail on transport and access to support the draft policy, including transport modelling of the proposed allocations. • Subject to the completion of construction of the ASEA flood defences, set out the appropriate mitigation required to ensure that the risk of flooding is appropriately addressed and does not add to flood risk elsewhere. • Undertake Habitats Regulation Assessment screening to determine effect of this policy and its allocations on international ecological designations associated with the River Severn and Avon. • Provide additional details for how development should contribute appropriate towards the habitat mitigation measure proposed for the Hallen Marsh area. • Provide detailed development considerations for these sites, including the approach to transport and access, will be included in a future version of this local plan.

Draft Policy E6: Protecting living conditions in Avonmouth village

Option 1 No new policy in relation to protecting living conditions in Avonmouth village

This option is effectively a ‘policy off’ alternative, which would rely on proposed retained policies such as DM35 *Noise Mitigation* and DM14 *The Health Impacts of Development*.

Given recent complaints of industrial nuisance and the worsening situation within the Indices of Multiple Deprivation, which set out that the Health Deprivation and Disability index decreased in the northern portion of the village area, whilst Living Environment index decreased in the southern portion, it was considered that a standalone policy which targeted the impact of development on the village of Avonmouth was considered necessary. A ‘policy off’ option was therefore not considered to be a reasonable alternative.

Option 2 Introduce new policy in relation to protecting living conditions in Avonmouth village

This policy option would see the introduction of a specific policy in relation to living conditions in Avonmouth. Residents have reported incidents relating to industrial and waste management uses operating within the area.

Events such as these illustrate the need for new development within the area to ensure that living conditions in the residential areas are carefully considered and appropriately protected when new development is proposed. Proposals for industrial, energy or related forms of development within a defined ‘impact mitigation zone’ will be assessed for their individual and cumulative impacts on nearby residential areas. Development will be expected to demonstrate proposed means of mitigating any harmful impacts.

Development which would be likely to have harmful effects on residential areas, and which cannot be appropriately mitigated, will not be permitted.

Reasonable Alternative	Yes
Rationale	NPPF Paragraph 180 requires planning policies to ensure that new development is appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.
Recommendations for Evidence Update	Provide additional definition of ‘related forms’ of development, and evidence of the ‘impact mitigation zone’ and what this is based on.

Draft Policy E7: New workspace within mixed use development

Option 1 No new policy in relation to new workspace within mixed use development

This option is effectively the “policy off” alternative, which would result in a reliance upon the retained BCAP policy approaches for the City Centre only (detailed within Policies BCAP6 and BCAP12). Given the assessment of strategic reasonable alternatives for employment and sustainability issues, particularly in relation to pressure on city centre land to meet the needs of commercial and residential space, this is not considered a reasonable alternative for the Local Plan, and as such, is not considered further.

Option 2 Include new policy in relation to new workspace within mixed use development

This option would introduce new policy with regards to new workspace within development (the ‘March 2019 Consultation Option’). It would require mixed use development proposed on brownfield sites currently or recently used for business, industry or distribution – however, not allocated specifically for development – to include provision of new workspace, to ensure that opportunities for business and employment are maintained or enhanced.

The option would be applicable to sites of 0.1 hectares or above and within Use Classes B1 (b or c), B2 and B8, or similar sui generis uses. It should be noted that since the publication of this option as part of the draft Local Plan that as part of the regulation changes to Planning Use Classes under The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, the B1 Use Class has since been replaced with Class E(g), while Uses B2 and B8 remain valid.

The policy would require mixed use development proposals in such areas to:

- Include workspace element that is proportionate to the wider proposal’s scale and location;
- Have regard to the employment intensity of the most recent use; and
- Consider design, siting and potential occupancy of the workspace element to ensure compatibility with surrounding residential development.

In addition, under this option, workspace provided or retained within redevelopment proposals can include flexible small workspace for enterprise (e.g. for SMEs), mixing B1a/b/c uses, virtual office, desk and co-working space and community-oriented facilities.

Reasonable Alternative	Yes
Rationale	This policy option would respond to NPPF requirement to be flexible enough to accommodate employment and economic needs not anticipated in the Local Plan; allow for new and flexible working practices; and to enable a rapid response to changes in economic circumstances (para 81 (d)).
Recommendations for Evidence Update	<ul style="list-style-type: none"> • Published Employment Strategy, as set out within the Inclusive and Sustainable Growth Strategy. • The EDNA (2016)and job forecasts and employment land requirements will need to be updated in light of Brexit, the new Local Industrial Strategy and Covid-19. • Provide additional detail to clarify definition of: ‘proportionate to the proposal’s scale and location’ and ‘recent employment intensity’.

Draft Policy E8: Digital connectivity and inclusion

Option 1 No new policy in relation to digital connectivity and inclusion within the Local Plan

This option is effectively the “policy off” alternative, which would result in a reliance upon the retained policy approaches for telecommunications (detailed within Policy DM28). Given the strategic objectives and sustainability issues associated with the need to increase digital connectivity across the city, this is not considered a reasonable alternative for the Local Plan, and as such, is not considered further.

Option 2 Introduce new policy in relation to digital connectivity and inclusion within the Local Plan

This option would introduce new policy with regards to digital connectivity within development (the ‘March 2019 Consultation Option’). It would require all development proposals to provide superfast broadband as a minimum, and full fibre connections where available. It would operate in addition to retained Policy DM36, which specifically addresses telecommunications development.

The policy text states that in locations where superfast broadband or full fibre connectivity is already available, development will be expected to include the infrastructure to connect to these services and make them available to occupiers. For the purposes of the policy, ‘available’ is defined as being where the necessary infrastructure exists at, or within close proximity to, the application site.

The policy text also sets out specific provisions for development proposed within locations where superfast broadband and full fibre is not already accessible, where the following requirements would apply:

- Applications will be required to demonstrate that discussions have been held with a range of providers to upgrade infrastructure to deliver superfast broadband or, where possible, full fibre connections;
- Where one or more providers have agreed to provide superfast broadband or full fibre, the development should be designed to connect to this service to enable availability for future occupiers; and
- Where evidence of no agreement has been reached to secure superfast broadband or full fibre connectivity, the development will be expected to incorporate additional dedicated telecommunications ducting to enable the provision of superfast broadband or full fibre connectivity in future.

In addition, the policy option requires that development proposals should demonstrate how it will meet the requirements of the policy through Connectivity Statements, to be submitted with planning applications. This Statement is required to include evidence of the connectivity at the site using connectivity assessments from a minimum of two broadband providers. It is noted that within this option costs of any developer contribution required for additional works could be incorporated within a development viability assessment.

Reasonable Alternative	Yes
Rationale	This policy option would respond to NPPF requirement to support provision of high-quality digital communications through the planning system (paras 112-116).
Recommendations for Evidence Update	BCC to maintain up-to-date technical guidance setting out the present industry standard and references to superfast broadband. As required by the Planning Practice Guidance, prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies (such as this one) is not of a scale that will make the plan undeliverable.

Stage 3: Assessment and evaluation of effects

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

General difficulties of assessing employment policies within an Interim Sustainability Appraisal are as follows:

- The approach to employment within the March 2019 Consultation was guided by the JSP, and therefore draft Local Plan Review policies are made to be in conformity with this strategic-level policy, context and evidence base. Given the withdrawal of the JSP and the progress of the emerging Spatial Development Strategy, all identified sustainability issues, assessments of reasonable alternatives and assessments of effects will need to be updated in line with new evidence and new policy directions.
- Since the March 2019 Consultation draft was published for consultation, and the JSP was withdrawn, the economy has been significantly impacted by the Covid-19 pandemic and associated 'lockdown' periods, alongside the new regulations within the EU-UK Trade Agreement ('Brexit'). As the Interim Sustainability Appraisal was in progress during the 2020 and early 2021, the baseline does not account for these emerging changes which were constantly changing. Future iterations of the Interim SA will need a significant review of the scoping report to understand the impact of these macro-economic shocks on demand for and supply of employment spaces will change.
- Evidence will need to be updated to reflect the changing context. Specifically, this will require an update of the Employment Strategy and Study, the Economic Development Needs Assessment and Employment Land Review. Traffic modelling and the updated Strategic Flood Risk Assessment will need to be updated to reflect any changes in proposals.
- It is not possible at this stage to assess some effects for specific policies with any level of certainty; for example, Policy E3 Office Development and E7 in relation to the provision of new workspace, where the effects are not generally attributable to specific site-boundaries at this stage.
- Industry and Distribution Areas ('IDA') and the Avonmouth Employment Allocations ('ASA') were also tested against constraints criteria using GIS (see Section 5 SA Framework), the purpose of which was to broadly assess the extent of constraints across these areas.

Summary of assessment findings

Selected Approach for E1 Policy

This Policy Option would result in a requirement for development proposals on land previously used for business uses, new workspace or commercial development and other major development that would generate new employment. Whilst there is already a requirement within the council's Supplementary Planning Document on planning obligations, ensuring this obligation is enshrined in policy will offer this requirement additional planning weight.

Whilst the effects would be location specific, cumulatively this policy could have citywide effects for ensuring access to, and removing barriers for, employment for local residents particularly where there are persistent levels of employment deprivation. Effects are likely to be complex: where existing workspace is redeveloped, positive effects may be achieved against Objective 8 DMC19 by balancing the effects of changes to business premises against facilitating enhanced access to employment. However, as this draft policy option is founded on development of sites previously used for employment uses, effects are overall complex for DMC19.

Selected Approach for E2 Policy

As this policy represents the employment land strategy and distribution of employment growth within the city, this has been assessed within the reasonable alternatives (within the main report Section 5) and therefore it is not necessary to repeat the assessment here.

Selected Approach for E3 Policy

This Policy Option identified core areas for future office development and the approach to the provision of smaller scale office development as part of mixed-use developments. Whilst a large proportion of effects will be subject to implementation of this policy, the draft policy could have beneficial effects for promoting the conservation and wise use of land. In addition, as the majority of GRAs are located within relatively deprived areas, the draft policy could result in beneficial effects for Objective 5 and 8.

Effects against Objective 8 are complex. The draft policy could support provision of a range of high-quality employment spaces to support the needs of communities and employers within the city and in some deprived areas (DMC17, DMC19), and re-provision of offices lost through permitted change of use from office to residential. By allowing office development within Bristol Temple Quarter (DMC20), this could support key sectors within a strategic employment location, whilst allowing offices as part of smaller scale developments could support SMEs and smaller-scale employers. However, as there is no defined quantum of offices required and no protection against permitted development rights, effects against this Objective also remain uncertain. To ensure office development on former business, industrial and distribution sites does not result in neutral effects against Objective 8, consider requiring 'no net loss' of jobs within mixed use proposals.

Selected Approach for E4 Policy

This Policy Option would result in the reservation of Industrial and Distribution Areas for the continued use, development of or redevelopment of industrial and distribution premises. This would result in generally positive effects in relation to the city's economy through provision of efficiently-used floorspace for strategic and local businesses with industrial or distribution needs, alongside several smaller industrial IDA sites identified for small – medium sized industrial and distribution businesses (Objective 8, DMC17). In addition, concentrating industrial and distribution uses within these core allocations, and requiring all proposals for development to make efficient use of land, the draft policy would also have significant positive effects for Objective 2.

However, overall the scale of positive effects against Objective 8 is not considered to be overall significant. Indeed, by allowing other uses such as community, leisure, training and utilities uses on these sites subject to specific circumstances, the effects are also uncertain. Safeguards could be introduced to ensure that industrial and businesses uses in these locations remain priority.

Several effects are uncertain and will be subject to implementation and individual IDA constraints. As the vast majority of IDAs are within AQMAs, and are at risk of flooding, effects are generally considered to be minor negative.

Selected Approach for E5 Policy

This Policy Option would result: in the retention, development and redevelopment of existing land within the Avonmouth Industrial Area for industrial, distribution, energy and port related uses; four

greenfield allocations for additional employment development; support for the continued development of large scale wind-turbines; and, an area of habitat mitigation at Hallen Marsh. This would allow for positive effects for Objective 5 and 8, by enabling suitable opportunities for employment within an area that generally has higher unemployment rates.

Whilst there is a potential for significant negative effects in relation to: proximity to international ecological designations associated with the River Severn and River Avon and the extent to which this policy would promote development in very high areas of flood risk, provision of further evidence to demonstrate the effects of ASEA flood mitigation and habitat creation could result in these effects being reduced. A Habitats Regulation Assessment screening should be undertaken to determine effect of this policy, and the cumulative effects of these allocations, on international ecological designations associated with the River Severn and Avon.

Mitigation will also be required to ensure that impacts on the Scheduled Monuments within the area are minimised.

Negative effects are also generated for Objective 2 through the development of greenfield land, however at a plan-level this could enable more effective development of brownfield land elsewhere within the City Council area.

Accessibility of Avonmouth does require further consideration within the next iteration of the SA, and this will be dependent on the implementation of major transport proposals within LTP4.

Selected Approach for E6 Policy

This draft policy option would require development in the Avonmouth Industrial Area to ensure that it does not have adverse impacts on living conditions in Avonmouth Village.

Positive effects are therefore likely for the health and wellbeing of Avonmouth residents, and where the living environment is improved, this could reduce noted health and built environment inequalities. Effects are likely to be felt at a local scale, specific to residents of Avonmouth village; however effects on proposals for development of industrial, energy or related forms may also be felt, if this results in viability implications for proposals.

Selected Approach for E7 Policy

This draft policy option would require mixed use development to include provision of new workspace where such proposals are located on brownfield sites, and are currently or recently used for business, industry or distribution but not allocated for development. The Option sets out that new workspace should be proportionate to the proposal's scale and location and have regard to the employment intensity of the most recent use. It requires proposals to consider design, siting and potential occupancy of the future workspace to ensure congruency with the surrounding development uses. The draft policy option also states that retained workspace can include flexible small workspace for SMEs.

The focus of this policy is to mitigate the effects of the Local Plan seeking to bring forward more brownfield land for housing by promoting the redevelopment of vacant and underused office space. This draft policy would therefore have indirect, significant positive effects for encouraging new

development to be space-efficient and by promoting the conservation and wise use of land. Benefits are likely to be accrued for Objective 8 (DMC17), however, this draft policy could also see a reduction in availability of employment spaces for B2 and B8 uses, as these are less likely to be adapted to workspace-types of development. Encouraging more localised development of employment spaces may reduce the need to travel, and may result in additional benefits as the effects of the pandemic on employee behaviour become clearer, however effects against the remainder of DMC21 are likely to be site-specific and subject to implementation.

Selected Approach for E8 Policy

This draft policy option would introduce new policy in respect of inclusive digital connectivity within the Local Plan and set specific requirements for new development proposals to ensure adequate level of connectivity for future occupants. It would also set a requirement for a Connectivity Statement that addresses the issue of digital and inclusive connectivity within all new development proposals.

Alongside having direct, cumulative benefits for Objective 8, by requiring development to provide enabling infrastructure for digital connectivity, this option could support better online access to key services, community facilities and employment opportunities (Objectives 3, 4 and 5) in areas which may not already benefit from full fibre connectivity. The effects on viability of this draft policy should be tested at a plan-level.

Draft Policy E1 Inclusive Economic Development

SEA Theme	SA Framework Objective	D-M Criteria	Assessment of Sustainability Effects							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	?	?	?	I	Both	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	AM: As required by the Planning Practice Guidance, prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies (such as this one) is not of a scale that will make the plan (and ambitions to exceed 33,500 homes) undeliverable.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	?	?	?	I	Both	Local	As above, plus: R: Brownfield sites and previously developed sites; AG: Local businesses.	AM: As required by the Planning Practice Guidance, prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies (such as this one) is not of a scale that will make the plan's ambitions undeliverable.
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	++	+/?	+/?	Both	Both	Local and City-wide.	R: Built environment. AG: Bristol's population and skills base.	MB: Require all new developments of homes or workspace, above the size threshold, to contribute to employment initiatives and skills development during the construction phase.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	++	+/?	+/?	I	Both	Local and City-wide	R: Bristol's population. AG: All groups.	AM: Define what is meant by 'local employment'. MB: Consider requiring all new developments of homes or workspace, above the size threshold, to contribute to employment initiatives and skills development during the construction phase. MB: Ensure sufficient capacity within existing educational facilities within the city to support longer-term formalised learning of construction skills.
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	MB: Define 'local' to ensure that skills development and employment initiatives are located within easy access to reduce the need to travel for learning / employment. AM: Quantify the number of jobs to be accessible for employees and the number / duration of employment initiatives required where development proposals include the redevelopment of business use sites, or workspace / commercial development is created, or a major development that involves new employment arises. AM: Provide evidence of the size thresholds that the draft policy applies to (i.e. 1000m ² of floorspace or over 100 homes).
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	?	?	?	I	Both	City-wide	R: Public health; AG: Bristol's population.	MB: Ensure skills development and employment initiatives are located within easy access to reduce the need to travel for learning / employment.
	14. To maintain and improve the existing highway network	DMC30 DMC31	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	17. Minimise air and noise pollution	DMC38	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	I	Both	City-wide	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Ensure skills development and employment initiatives are local to reduce the need to travel for learning / employment.
Evaluation of Effects	<p>Rank / Summary: This Policy Option would result in a requirement for development proposals on land previously used for business uses, new workspace or commercial development and other major development that would generate new employment. Whilst there is already a requirement within the council's supplementary planning document on planning obligations, ensuring this obligation is enshrined in policies will offer this requirement additional planning weight.</p> <p>Scale of effects: The effects would be location specific, cumulatively this policy could have citywide effects for ensuring access to employment and removing barriers to employment for local residents particularly where there are persistent levels of employment deprivation. Effects are likely to be complex: where existing workspace is redeveloped, positive effects may be achieved against Objective 8 DMC19 by balancing the effects of changes to business premises against facilitating enhanced access to employment. However, this draft policy option is founded on development of sites previously used for employment uses, which could have equally negative effects for DMC19.</p> <p>Assessment of Effects: As this option relates to the removal of barriers to employment, and facilitating skills development, effects predominantly relate to Objective 5, 7 and 8:</p>									

- Requiring residential development on previously developed business sites to enable access to employment and remove barriers to employment for local residents could result in the addition of a planning obligation, which may have impacts on the deliverability of development. Whilst effects would be indirect, and potentially neutralised as removing barriers to employment is already a requirement of the Planning Obligations SPD (2012), the impact on viability of schemes should be assessed (Objective 1, DMC1, DMC2; Objective 2, DMC5).
- Recognising that persistent and multiple socio-economic deprivation is found in parts of the city, the draft policy is focussed on the principle of supporting economic growth which is inclusive and offers opportunity to all. Whilst effects would be location-specific, this option could result in potential for investment in deprived areas (Objective 5, DMC11; Objective 7). Effects are likely to be significant positive in the short term, as the policy requires contribution to the provision of training and removal of barriers to employment for local residents particularly during the construction phase of major developments. It is unclear at this stage whether this requirement will be extended to construction of all new developments above the size threshold on sites previously used for business development. Additionally, it is unclear whether long term there is sufficient capacity within existing educational facilities (i.e. construction and skills colleges) to ensure longer-term formalised learning in these employment sectors (Objective 7).
- The draft policy option would not result in the provision of physical employment space, it would instead enable access to employment and seek to remove barriers to employment for local residents. Effects are likely to be complex: where existing workspace is redeveloped, positive effects may be achieved against Objective 8 DMC19 by balancing the effects of changes to business premises against facilitating enhanced access to employment. However, this draft policy option is founded on development of sites previously used for employment uses, which could have equally negative effects for DMC19.
- Uncertain, and possibly neutral, effects are likely to be recorded for Objective 8 DMC21 as this could result in similar 'travel to work' times. Ensuring skills development and employment initiatives are within easy access could help reduce the need to travel or reduce use of private vehicles (Objective 13, Objective 18).

Draft Policy E3 Location of Office Development

SEA Theme	SA Framework Objective	D-M Criteria	Assessment of Sustainability Effects							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
Short	Med	Long								
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	+/?	+/?	+/?	Both	P	Local and City-wide.	R: Brownfield sites and previously developed sites; AG: Local businesses.	AM: Consider requiring office uses to only be on brownfield or previously developed land. MB: Set out appropriate densities for development which incorporates offices (as part of mixed use developments).
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Bristol's local economy; Bristol's population AG: Local businesses.	n/a
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Built environment. AG: Bristol's population and skills base.	MB: Require all new developments of offices to contribute to employment initiatives and skills development during the construction phase (see draft Policy E1).
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	Both	Both	Local and City-wide	R: Public health; AG: Bristol's population and employees.	CR: Draft policies relating to air quality and mitigation requirements. CR: Policies which improve the walking and cycling environment to employment locations (including well-lit cycleways and bike storage on-site). MB: Consider opportunities for landscaping to provide attractive open spaces and pleasant surroundings for employees.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	MB: Require all new developments of offices to contribute to employment initiatives and skills development during the construction phase (see draft Policy E1).
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	AM: Provide a defined quantum of office spaces to be delivered within Bristol Temple Quarter, St Philips Marsh and as part of mixed use development within the GRAs. This should contribute to a strategic quantum established across the city. Consider requiring 'no net loss' of jobs within mixed use proposals on of former business, industrial and distribution sites. CR: Make reference to requiring employment spaces to move towards zero carbon development (CCS1-3).
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Bristol's local economy; Bristol's population; AG: Local businesses.	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	Both	P	Local	R: Cultural heritage; built environment; and Conservation Areas; AG: Population.	CR: Requirement for proposals to be compliant with other Local Plan policies that address the historic environment (including Draft Policy DC3).
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	Both	Both	Local and City-wide	R: Local wildlife and biodiversity; natural environment. AG: Bristol's population; employees; wildlife.	CR: Requirement for proposals to conserve and enhance ecological designations, and require a net gain in biodiversity.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	Both	Both	Local and City-wide	As above.	MB: Consider opportunities to maximise multifunctional green infrastructure, particularly where this might overlap with areas of blue infrastructure.
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	?	?	?	Both	Both	City-wide	R: Public health; AG: Bristol's population.	AM: Require appropriate walking and cycling provision to enable this to be made an attractive and routine method of transport, particularly those GRAs which are less well served by public transport.
	14. To maintain and improve the existing highway network	DMC30 DMC31	?	?	?	Both	Both	City-wide	R and AG: Bristol's highway network; public health; Bristol's population.	AM: Set out the impact of development proposals on the local highway network.
Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	Both	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Businesses.	AM: Publish updated evidence in relation to the Strategic Flood Risk Assessment.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	Both	Both	Local; City-wide; trans-boundary	R: Natural environment (water and land); AG: Businesses.	CR: Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management.
	17. Minimise air and noise pollution	DMC38	?	?	?	Both	Both	Local; City-wide; trans-boundary	R: Localised air quality; biodiversity; public health; built environment; AG: employees; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	Both	Both	Local; City-wide; trans-boundary	R: Natural environment; AG: Bristol's population; local wildlife.	CR: Draft Policy CCS2
Evaluation of Effects	<p>Summary: This Policy Option identified core areas for future office development and the approach to the provision of smaller scale office development as part of mixed-use developments. Whilst a large proportion of effects will be subject to implementation of this policy, the draft policy could have beneficial effects for promoting the conservation and wise use of land. In addition, as the majority of GRAs are located within relatively deprived areas, the draft policy could result in beneficial effects for Objective 5 and 8.</p>									
	<p>Effects against Objective 8 are complex; whilst the draft policy could support provision of a range of high-quality employment spaces to support the needs of communities and employers within the city and in some deprived areas (DMC17, DMC19), and re-provision of offices lost through permitted change of use from office to residential. By allowing office development within Bristol Temple Quarter (DMC20), this could support key sectors within a strategic employment location, whilst allowing offices as part of smaller scale developments could support SMEs and smaller-scale employers. However, as there is no defined quantum of offices required and no protection against permitted development rights, effects against this Objective remain uncertain. In addition, as smaller scale development for offices / flexible workspace is considered to be appropriate as part of mixed use redevelopment of former business, industrial and distribution sites, positive effects would be neutralised at these locations.</p>									

Scale of effects: The effects would be both site specific and city-wide. Cumulatively, this policy could have citywide effects for delivering office development across the city, however effects remain uncertain without a target for levels of employment uses.

Assessment of Effects:

- The focus of the draft policy is the location of office development. As the draft policy requires the development of offices as part of mixed use developments within the Growth and Regeneration areas, or as part of other smaller scale office developments, effects of this policy against Objective 1 (the ability deliver sufficient housing in the city) is therefore fairly limited.
- The effects of this draft policy against Objective 2 is overall uncertain, but likely to be positive. Given the predominantly urban and brownfield nature of DS2 and DS3, where more intensive development is proposed, office developments within these areas is likely to generate significant positive effects against Objective 2 (DMC5 and DMC7). However, as the policy allows for development of offices within any areas of growth and regeneration, effects may be less positive where these areas of green space or less intensive densities. Effects are uncertain for town and district centres and edge of centre developments.
- The draft policy would encourage the development of offices within areas of growth and regeneration as part of mixed use developments, within Bristol Temple Quarter and St Philip's Marsh as B1 only uses, and within or on the edge of town and district centres. Whilst some areas of growth and regeneration are better served than others, the draft policy would generally have a positive effect in ensuring that development would be within walking distance of key services and local retail centres (Objective 3, Objective 9 DMC23). Effects of smaller scale office development against this Objective is uncertain.
- The vast majority of the areas of growth and regeneration overlap with areas that are considered to be more deprived. Permitting office developments in locations which are considered to be more deprived could offer greater potential for regeneration or investment, and potentially the creation of jobs (DMC11). Effects are also uncertain and will be subject to implementation (DMC10), particularly as smaller scale development of offices and flexible workspace could be appropriate anywhere within the city.
- Effects of this draft policy against Objective 6 are unknown, and subject to implementation and siting of development. The majority of areas of growth and regeneration have an overlap with AQMA and cumulative impact zones. New development proposed within such areas may have negative repercussions for health unless impacts can be adequately mitigated through design or wider public health infrastructure improvements. Recommendations are therefore made above for enhancing mitigation and/or maximising the benefits of this option.
- Effects against Objective 8 are complex. The policy could support provision of a range of high-quality employment spaces to support the needs of communities and employers within the city and in some deprived areas (DMC17, DMC19), and re-provision of offices lost through permitted change of use from office to residential. In addition, by allowing office development within Bristol Temple Quarter (DMC20), this could support key sectors within a strategic employment location, whilst allowing offices as part of smaller scale developments could support SMEs and smaller-scale employers. However, as there is no defined quantum of offices required and no protection against permitted development rights, effects against this Objective remain uncertain. In addition, as smaller scale development for offices / flexible workspace is considered to be appropriate as part of mixed use redevelopment of former business, industrial and distribution sites, positive effects would be neutralised at these locations. The extent to which it would deliver low carbon or carbon natural employment spaces (DMC21) – both through sustainable access and/or low or zero carbon design – is unknown at this stage.
- Effects against Objective 10 – 12 will be subject to implementation, and the siting and design of the overall development. The same is the case for Objective 15, where effects will be subject to implementation too. As offices are considered to be a 'less vulnerable use', these uses are typically considered to be acceptable in all but areas of Flood Risk Zone 3b. Sequential layout of sites could be considered to avoid areas of greatest risk.
- Again, some areas of growth and regeneration are better served than others in terms of public transport. Proposed improvements to public transport accessibility or active travel are set out within the assessment of DS policies, and therefore the effects against Objective 13 and 14 are largely unknown and subject to implementation. The impact of proposals would need to be supported by updated modelling to test the effects of development within the wider GRA on highway network, although effects are likely to be lessened by the fact these sites are already operational (DMC30 and DMC31).
- Against SA Objectives 16 and 18, effects of this option are also unknown, as development proposals may enable opportunities to maximise site-level adaptations. However, this is also linked to the intensification of land use / development and the design of the wider scheme within which new workspace is proposed; and the extent to which other mitigation measures (within Policy CCS2) are enabled. The standard of sustainable design, energy efficiency and construction are unknown; and may not be consistently applied across a site or building level due to factors such as viability or site constraints.

Draft Policy E4 Industrial and Distribution Areas

SEA Theme	SA Framework Objective	D-M Criteria	Assessment of Sustainability Effects							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	+/?	+/?	+/?	Both	Both	City-wide	R: Bristol's economy; brownfield and previously developed land; AG: Local businesses.	AM: Set out traffic modelling for the allocation of the IDA, to further test the degree to which this is a sustainable location, and look to consider opportunities to strengthen active transport (walking and cycling) routes including for 'last mile' journeys.
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	D	P	Local	R: Local economy; AG: Local businesses and employees.	MB: Cross reference to relevant policies for the provision of retail, and add further definition to a threshold for 'small scale retail uses'.
	4. Increase participation in cultural and community activities	DMC9	+/?	+/?	+/?	D	P	Local	AG: Local employees.	MB: Encourage use of community facilities by both local employees, and by local residential communities.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Built environment; employees; AG: Bristol's population, employees and skills base.	MB: Within areas of higher deprivation, ensure that there is 'no net loss' of jobs where proposed are made for the development of or redevelopment for industrial and distribution premises. CR: Make reference to Draft Policy E1 Inclusive Economic Development
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	Both	Both	Local and City-wider	R: Public health. AG: Bristol's employees and population.	CR: Make reference to Draft Policy HW2 Air Quality AM: Require appropriate walking and cycling provision where the site is relatively poorly accessed, to enable this to be made an attractive and routine method of transport. CR: Policies which improve walking and cycling environment to employment locations (including well-lit cycleways and bike storage on-site). MB: Consider opportunities for landscaping to provide attractive open spaces and pleasant surroundings for employees.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	+/?	+/?	+/?	D	P	Local	AG: Local employees.	MB: Consider whether Draft Policy E1 could also be expanded to relate to redevelopment of existing business uses (not just new homes or new workspaces on sites previously used for employment uses).
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy and environmental; AG: Local businesses, Bristol's population.	AM: Strengthen draft policy to ensure reference is made to Local Industrial Strategy priority sectors. AM: Where other uses are proposed, specifically 'leisure uses' and 'essential public utilities', set out principle or a sequential test for situations where this may be acceptable. CR: Draft policies on towards zero-carbon development and adaptation to a changing climate.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	D	P	Local	AG: Local employees.	MB: Cross reference to relevant policies for the provision of retail, and add further definition to a threshold for 'small scale retail uses'.
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	Both	P	Local	R: Cultural heritage; built environment; and Conservation Areas; AG: Population.	CR: Requirement for proposals to be compliant with other Local Plan policies that address the historic environment (including Draft Policy DC3).
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	Both	Both	Local and City-wide	R: Local wildlife and biodiversity; natural environment. AG: Bristol's population; employees; wildlife.	CR: Requirement for proposals for development or redevelopment of IDAs to conserve and enhance ecological designations, and require a net gain in biodiversity.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	Both	Both	Local and City-wide	As above.	MB: Consider opportunities to maximise multifunctional green infrastructure, particularly where this might overlap with areas of blue infrastructure.
	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	Both	Both	City-wide	R: Public health; AG: Bristol's population.	AM: Require appropriate walking and cycling provision to enable this to be made an attractive and routine method of transport, particularly those sites outside accepted walking distances.
Transport	14. To maintain and improve the existing highway network	DMC30 DMC31	?	?	?	Both	Both	City-wide	R and AG: Bristol's highway network; public health; Bristol's population.	AM: Set out the impact of development proposals on the local highway network.
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	-/?	-/?	-/?	Both	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Businesses; utilities infrastructure; local wildlife.	AM: Publish updated evidence in relation to the Strategic Flood Risk Assessment. AM: Consider removing areas of sites within Flood Risk Zone 3b, or require sequential layout to avoid any new development within these areas. Community and training uses are considered to be 'more vulnerable' and therefore should not be permitted within Flood Zone 3b, and require an exception test in areas of Flood Risk Zone 3a. Energy uses are considered to be 'essential infrastructure' and therefore require an exception test in 3a and 3b.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management.
	17. Minimise air and noise pollution	DMC38	-/?	-/?	-/?	I	Both	Local; City-wide; trans-boundary	R: Localised air quality; biodiversity; public health; built environment; AG: population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2. AM / CR: Agent of change principles / noise mitigation in relation to where other uses are proposed on site.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	D	Both	Local; City-wide; trans-boundary	R: Natural environment; AG: Bristol's population; local wildlife.	MB: Consider positively supporting low carbon and renewable sources for utilities (energy) infrastructure.

Rank 1 / Summary: This Policy Option would result in the reservation of Industrial and Distribution Areas for the continued use, development of or redevelopment of industrial and distribution premises. This would result in generally positive effects in relation to the city's economy through provision of floorspace for strategic and local businesses with industrial or distribution needs, with several smaller industrial IDA sites identified for small – medium sized industrial and distribution businesses (DMC17). By concentrating industrial and distribution uses within these core allocations, and requiring all proposals for development to make efficient use of land, the draft policy would also have significant positive effects for Objective 2. However, overall the scale of positive effects against Objective 8 is not considered to be overall significant. Indeed, by allowing other uses such as community, leisure, training and utilities uses on these sites subject to specific circumstances, the effects are also uncertain. Safeguards could be introduced to ensure that industrial and businesses uses in these locations remain priority. Several effects are uncertain and will be subject to implementation and individual IDA constraints. As the vast majority of IDAs are within AQMAs, and are at risk of flooding, effects are generally considered to be minor negative.

Scale of effects: The effects are likely to be felt most acutely at a local level in relation to individual IDAs. However, by allowing other uses on IDAs which are already considered to be a concentration of industrial and distribution space, then this could have uncertain effects at a city-wide level.

Assessment of Effects:

- All Industry and Distribution Areas (IDAs) are located on predominantly brownfield land, which is currently in employment use and therefore the effects against Objective 2 DMC5 are likely be positive. In addition, some IDA boundaries explicitly exclude areas of greenfield land (IDA013). As there is a focus on encouraging efficient use of land both through allocation Industry and Distribution areas, and areas no longer allocated, there are proposed IDAs which no longer include underused adjacent brownfield land (including IDA019, IDA021, IDA028, IDA031, IDA036). Positive effects are likely to be achieved for DMC6 as IDAs generally hold high levels of accessibility with several sites being located adjacent or close to train stations, multiple bus routes and strategic or local cycleways; this is not the case for the sites at Avonmouth, however the assessment of this is covered against Draft Policy E5. For some IDAs, there are opportunities to strengthen active transport (walking and cycling) routes including for 'last mile' journeys, which could form an additional recommendation for Draft Policy E4.
- By allowing a proportion of the IDA to be occupied by community facilities, training facilities and ancillary facilities and services which support its overall function, in accordance with other relevant development plan policies, this draft policy could have positive effects for Objective 3 (DMC8), Objective 4 (DMC9), Objective 7 (DMC15) and Objective 9 (DMC23). Four IDAs (IDA015, IDA021, IDA023 and IDA028) fall outside accepted walking distances (800m) of a Local Centre, District Centre, Town Centre or City Centre. Often the market has delivered on-site retail uses and sandwich shops, however in some areas (particularly two IDAs adjacent to Hartcliffe Way) these sites do have a poor ancillary offer. Effects are uncertain, as these will be subject to implementation.
- By encouraging the continued use, development of or redevelopment for industrial and distribution premises, IDAs located within areas of high deprivation are considered to generate positive sustainability effects under DMC10 (using the Indices of Multiple Deprivation Index 2019 data, where the top 30% most deprived Lower Super Output Areas). This draft policy could generate some cumulative benefits for the built environment where site allocations are concentrated in wards which generally have higher levels of deprivation, including Brislington and Hartcliffe. It is unclear of the extent to which this draft policy could generate positive effects for DMC11, particularly in relation to the provision of 'new jobs' as many of these areas are already established and the policy allows IDAs to be reserved for the continued use for industrial and development purposes. Where redevelopment is proposed, the draft policy could be expanded to ensure that there is 'no net loss' of jobs within deprived areas and ensure cross-references are made to draft policy E1. Overall effects are subject to implementation.
- Effects against Objective 6 are complex. The majority of IDAs (18 of 35) are within AQMAs or cumulative impact areas. As such, these are considered to have potential for minor negative effects for employee and local resident health (DMC12), without appropriate mitigation. The majority of IDAs generally perform relatively well across DMC14 as the majority of sites are proposed within locations that are within acceptable distances of walking, cycling routes or bus stops, as set by the SA Framework. For those sites which are considered to have poorer levels of accessibility (including IDA007, IDA030, IDA031 and IDA032), improvements to walking and cycling provision may be required through contributions.
- Effects against Objective 8 are complex. Indeed, the strategic principles of concentrating employment uses onto IDA allocations, and requiring the effective use of land within these, is set out within the Reasonable Alternatives section of the Interim Report. At a draft policy level, the IDAs are considered to generate positive effects for the city's economy through provision of floorspace for strategic and local businesses with industrial or distribution needs, with several smaller industrial IDA sites identified for small – medium sized industrial and distribution businesses (DMC17). However as other uses are allowed on these sites in specific circumstances, the effects are also uncertain and not considered to be significantly positive. Draft Policy E4 does not specify the types of priority sectors which are desirable, or how sites align with these sectors. Priority sectors are identified within the Local Industrial Strategy (LIS): advanced engineering, including aerospace; creative, cultural and digital industries; and financial, business and legal 'tech' services. Therefore effects against DMC18 and DMC20 are likely to be positive, however draft policy E4 could be strengthened to reference these priority sectors. As IDAs are predominantly proposed within South and East Bristol, with almost 50% of the city-wide total IDA land area in South Bristol, development of such sites could secure and deliver further employment opportunities in areas of the city that continue to experience relatively higher rates of unemployment (based on IMD data for 2019) (DMC19). It is unclear at this stage of the extent to which the IDAs would support delivery of carbon neutral employment (DMC21), which would be largely subject to implementation.
- A limited number of IDAs are considered to have potential for negative, unknown sustainability effects for the historic environment (DMC24) where they are located within (IDA018, IDA019, IDA024, IDA025, IDA028) or on the boundary of a Conservation Area (IDA001, IDA006, IDA008, IDA010). While the potential impact of site development upon the affected Conservation Areas is not possible to determine at this stage, the requirement for proposals to be compliant with other Local Plan policies that address the historic environment (including Draft Policy DC3) would ensure the appropriate safeguarding of Conservation Areas and is therefore sufficient mitigation for IDAs. Effects could be considered to be minor negative and uncertain in absence of this cross-reference.
- The vast majority of IDAs are located outside of designated ecological areas, however, most are adjacent to either a wildlife corridor and/or a SNCI. One IDA (IDA028) includes a partial overlap of a Site of Nature Conservation Interest (SNCI), located on a small area of greenfield land to the west. IDA014, IDA015, IDA021 and IDA023 include a partial overlap with a wildlife corridor, although this overlap is limited in extent. Several sites are adjacent to wildlife corridors or on the boundary of a SNCI, including the River Avon SNCI and Easton-Staple Hill Disused Railway SNCI. Further development or redevelopment of IDAs in these locations could therefore introduce cumulative negative effects for existing ecology and habitat areas in the absence of appropriate mitigation (Objective 11) and there could be opportunities through development or redevelopment proposals for off-site enhancement and/or provision of on-site green or blue infrastructure (Objective 12).
- Overall, the majority of draft IDAs are generally considered to have potential to generate positive effects against DMC28, which would encourage access to sustainable modes of transport (i.e. walking, cycling and public transport), albeit there are a small number which are located beyond accepted walking distances (set out against Objective 6, DMC14). The impact of these allocations would need to be supported by updated modelling to test the effects on highway network, although effects are likely to be lessened by the fact these sites are already operational (DMC30 and DMC31).
- Effects associated with flood risk are complex. Several IDAs have small areas within Flood Risk Zone 3b (IDA001; DIA002; IDA003; IDA012; IDA019; IDA021; IDA024; IDA025; IDA032). Whilst 'less vulnerable' development is proposed on these sites, the Flood Risk Vulnerability Classification considers that this type development should not be permitted in areas of Flood Risk Zone 3b. Secondly, there are several IDAs proposed within Flood Risk Zone 3a or 3 with variable surface water levels. Proposals for 'less vulnerable uses' on these sites could represent effective use of city centre land that is at risk of flooding, subject to appropriate mitigation. Finally, in addition, community and training uses are other uses which are proposed through the draft policy; as these are considered to be 'more vulnerable' uses, these should not be permitted within Flood Risk Zone 3b, and should be subject to an 'exception test' where proposed within areas of Flood Risk Zone 3a. There are considered to be several IDAs include areas of high or medium surface water flood risk and therefore development proposals at the site will be required to account for current and projected risks at planning application stage, in accordance with Retained Policies BCS16 and BCAP5. On balance the effect is therefore negative, but not significantly negative at a city-wide level.
- All draft IDAs are considered to be unknown in their sustainability effects for several decision-making criteria under SA Objective 16 (DMC35 and DMC36), based on the fact the extent to which development would reach minimise resource use and waste production, while increasing energy efficiency of development, is dependent upon implementation and compliance with other Local Plan policies. In addition, as there are no groundwater protection zones identified within the Plan area based upon latest available Defra mapping, however several IDAs (IDA012; IDA019; IDA024; IDA025; IDA030; IDA031; IDA032) are located adjacent to a vulnerable water body (the River Avon), which is classified by the EA as 'moderate' in quality. It is considered that the site allocations have a limited potential to improve water quality baseline directly on the basis of current policy text; and could create negative and cumulative impacts for water quality of the River Avon, subject to the type of development proposed and any on/off site mitigation. Retained Local Plan policies would ensure that flood risk and water management is accounted for within new development.
- A significant proportion of IDAs are proposed within AQMAs or their cumulative air quality impact zones. As such, these sites are considered to have potential for minor negative effects for SA Objective 17 in relation to minimising exposure to pollution (DMC38), without either appropriate mitigation. For IDAs located in AQMAs or cumulative air quality impact zones, development or redevelopment of industrial use premises, or other uses deemed acceptable by Draft Policy E4, would be required to be delivered with appropriate mitigation in line with Draft Policy HW2.
- All draft IDAs and the draft policy is considered to be unknown in their sustainability effects for several decision-making criteria under SA Objective 18 (DMC39, DMC40 and DMC42), based on the extent to which development would reach energy efficiency targets, climate resilient design and/or use of renewable energy is dependent upon final detailed design / operation, directed by other Local Plan policies. Under DMC41, several IDAs are likely to generate minor positive effects as they are located in an existing Heat Priority Network Areas (Central Bristol or Hartcliffe Campus), which resultantly means that such sites are able to access low-carbon heat energy sources for any future development.

Draft Policy E5 Avonmouth Industrial Area and Bristol Port

SEA Theme	SA Framework Objective	D-M Criteria	Assessment of Sustainability Effects						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
Short	Med	Long								
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	-	-/?	-/?	D	Both	Local	R: Bristol's economy; greenfield sites; AG: Local businesses.	MB: Provide additional details for how development should contribute appropriate towards the habitat mitigation measure proposed for the Hallen Marsh area. AM: Provide additional evidence of the impacts of the Metrowest and the new M49 junction on the overall accessibility of this location.
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	AM: Consider reference to non-employment land exceptions for ancillary uses that directly support the main function of the site (i.e. on-site hot food provision and creches) for proposed uses that are beyond walking distance of Avonmouth.
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Built environment; AG: Bristol's population and skills base.	MB: Consider whether Draft Policy E1 could also be expanded to relate to redevelopment of existing business uses (not just new homes or new workspaces on sites previously used for employment uses).
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	Both	Both	Local and City-wider	R: Public health. AG: Bristol's population.	AM: Require appropriate walking and cycling provision to enable this to be made an attractive and routine method of transport. CR: Policies which improve the walking and cycling environment to employment locations (including well-lit cycleways and bike storage on-site). MB: Consider opportunities for landscaping to provide attractive open spaces and pleasant surroundings for employees.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	MB: Consider whether Draft Policy E1 could also be expanded to relate to redevelopment of existing business uses (not just new homes or new workspaces on sites previously used for employment uses).
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	++/?	++/?	++/?	Both	Both	Local and City-wide.	R: Bristol's local economy and environmental; AG: Local businesses, Bristol's population.	CR: Draft policies on towards zero-carbon development and adaptation to a changing climate.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	AM: Consider reference to non-employment land exceptions for ancillary uses that directly support the main function of the site (i.e. on-site hot food provision and creches) for proposed uses that are beyond walking distance of Avonmouth.
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	-/?	-/?	-/?	D	P	Local	R: Cultural heritage; built environment; and Scheduled Monuments; AG: Bristol's population.	AM: Require appropriate mitigation to minimise any impacts on the Scheduled Monuments within area (at Land north of King Weston Lane and the Historic Gun Battery site).
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	--/?	--/?	--/?	Both	Both	Trans-boundary (?)	R: Local wildlife and biodiversity including international statutory designations; natural environment. AG: Bristol's population; wildlife.	AM: Undertake Habitats Regulation Assessment screening to determine effect of this policy and its allocations on international and national ecological designations associated with the River Severn and Avon. AM: Provide greater detail on the means by which 'development should contribute appropriately towards the habitat mitigation measures' proposed.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	D	Both	Local	As above.	AM: Provide greater detail on the means by which 'development should contribute appropriately towards the habitat mitigation measures' proposed. AM: Provide appropriate evidence that the green infrastructure benefits provided by the four greenfield allocations can be mitigated through the Hallen Marsh mitigation area.
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	-/?	?	?	Both	Both	City-wide	R: Public health and economy; AG: Bristol's population.	AM: Set out the effects of Metrowest Phase 1a on provision at Avonmouth and the St Andrews station on accessibility and costs of travel (particularly for lower paid employees). AM: Require appropriate walking and cycling provision to enable this to be made an attractive and routine method of transport.
	14. To maintain and improve the existing highway network	DMC30 DMC31	?	?	?	Both	Both	City-wide	R and AG: Bristol's highway network; public health; Bristol's population.	AM: Set out the impact of development proposals on the local highway network, including the new junction on the M49 for vehicular accessibility.
	15. To reduce the risk of flooding from all sources	DMC32 DMC33	--/?	--/?	--/?	Both	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; businesses; essential infrastructure; local wildlife.	AM: Require 'exceptions' test to be undertaken where energy uses, and essential infrastructure, is proposed. AM: Assess the effects of the ASEA Flood mitigation scheme within the next SA iteration. AM: Publish updated evidence in relation to the Strategic Flood Risk Assessment.
Climate, Energy and Waste	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management.
	17. Minimise air and noise pollution	DMC38	0/?	0/?	0/?	I	Both	Local; City-wide; trans-boundary	R: Localised air quality; biodiversity; public health; built environment; AG: population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2. AM / CR: Agent of change principles / noise mitigation in relation to proposed uses within the area, and residential development at Avonmouth (Draft Policy E6).
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+/?	+/?	+/?	D	Both	Local; City-wide; trans-boundary	R: Natural environment; AG: Bristol's population; local wildlife.	MB: Positively support energy from low carbon and renewable sources by expanding definition of 'energy uses' to include this.

Evaluation of Effects	<p>Rank / Summary: This Policy Option would result: in the retention, development and redevelopment of existing land within the Avonmouth Industrial Area for industrial, distribution, energy and port related uses; four greenfield allocations for additional employment development; support for the continued development of large scale wind-turbines; and, an area of habitat mitigation at Hallen Marsh. This would allow for positive effects for Objective 5 and 8, by enabling suitable opportunities for employment within an area that generally has higher unemployment rates. Whilst there is a potential for significant negative effects in relation to: the international ecological designations associated with the River Severn and River Avon and the extent to which this policy would promote development in areas of higher flood risk, provision of further evidence to demonstrate the effects of ASEA flood mitigation and habitat creation could result in these effects being reduced. Negative effects are also generated for Objective 2 through the development of greenfield land, however at a plan-level this could enable more effective development of brownfield land elsewhere within the City Council area. Mitigation will be required to ensure that impacts on the Scheduled Monuments within the area are minimised. Accessibility of Avonmouth does require further consideration within the next iteration of the SA, and this will be dependent on the implementation of major transport proposals within LTP4.</p> <p>Scale of effects: The effects are likely to be felt at a range of scales. Retention, development and redevelopment of existing land within the Avonmouth Industrial Area, alongside the additional four allocations within the Enterprise Area may have city-wide effects for employment. Subject to further evidence and assessment of effects, responding to flood risk and effects on ecological designations could also have local, city-wide and larger than local effects. There will also be site-specific effects in relation to constraints and proposed mitigation.</p> <p>Assessment of Effects: Whilst effect of this policy have the potential to be broad-ranging, effects are not strongly applicable to Objective 1, 4, 7 and 9 although there is potential for indirect interdependencies for these topics. Effects of this draft policy option are summarised as follows:</p> <ul style="list-style-type: none"> • Effects against Objective 2 are complex. Whilst the draft policy would seek to enable the continuation of growth within an existing industrial area (DMC5), this would also result in the allocation of 60 hectares of greenfield land within the Enterprise Area (DMC5 and DMC7). The area is adjacent to junction 18 of the M5 and a new junction on the M49 further north, and is therefore the area is accessible by vehicular traffic. However, public transport provision within the area is poor and decreases away from Avonmouth Road and the two railway stations, where the current service is poor. Whilst the extent to which this area is considered to be a sustainable location should change with the introduction of MetroWest Phase 1a, this project is in the early phases of the delivery process and therefore is unlikely to have any effects in the short term. The overall effect of the policy is therefore negative, however potentially changing in the medium and longer term. • The proposed allocations and existing Avonmouth Industrial Area is located within an area of high deprivation (areas ranging between decile 2 – 4 of the proportion of the working-age population in an area involuntarily excluded from the labour market). It is considered that allocation for employment in these areas could offer potential for regeneration or investment in employment an any supporting infrastructure (e.g. delivered via s106 agreements). Therefore effects against Objective 5 DMC11 are likely to be positive overall. However, it remains unknown the extent to which development brought forward in such locations would be an improvement to the built environment (DMC10), as this would be subject to final detailed design amongst other considerations. • The Avonmouth Industrial Area nor the proposed allocations are within an AQMA or cumulative impact area. Therefore, the effects against Objective 6 DMC 12 are likely to be neutral, but dependent on the type and nature of development proposed. Although there are several leisure (Severn Beach Loop), long-distance (NCN41) and Sustrans cycle networks (Avon Cycleway) through the area, the walking and cycling environment is relatively poor (for example, there is no footpath along lengths of Kings Weston Lane) and there is fairly poor connectivity from the station. • The proposed approach in Avonmouth Industrial Area would maintain an existing employment area of the city (DMC20), whilst allocating new, currently undeveloped sites to support continued growth within the Enterprise Area. It is likely that development would provide additional high quality employment spaces for industrial uses (DMC17). The draft policy E5 does set out the types of uses that will be acceptable (industrial, distribution, energy and port-related uses); although these are broader than the priority sectors, the Enterprise Area itself is identified within the Local Industrial Strategy and will therefore contribute to wider ambitions for growth (DMC20). As the area is considered to experience relatively higher rates of unemployment (based on IMD data for 2019), the draft policy could have beneficial effects for DMC19 alongside draft policy E1. Whilst the extent to which the draft policy achieves DMC21 will be subject to detailed design, proposals for wind turbines and renewable energy uses will be a have some positive effects on this criterion. Effects are uncertain however, as increasing employment land provision here may increase the need to travel for employment from elsewhere in the city. • Land north of King Weston Lane overlaps with the ‘Mere Bank and Flanking Ditches’ Scheduled Monument, and the Historic gun battery site within the Avonmouth Industrial Area overlaps with the ‘Heavy Anti-aircraft battery 520m east of Holes Mouth’ Scheduled Monument. St Brendan’s Way site within the Avonmouth Industrial Area overlaps with the Grade II listed Bristol Tramways Company Avonmouth Depot on Avonmouth Road. Whilst the majority of the area will likely have a neutral effect when assessed against Objective 10, there are areas with designated heritage assets of the highest significance. The overall effect is likely to be negative, with areas which may be of significant negative effects subject to proposals for appropriate mitigation. • The Avonmouth Industrial Area, specifically Victoria Road and Port operations areas, directly overlap with the SSSI, SPA, SAC and RAMSAR ecological designations associated with the River Severn. These areas are also adjacent to Lamplighters Marsh Local Nature Reserve. In addition, large portions of the Industrial Area overlap with SNCI and Wildlife Corridors. The combination of allocation of four greenfield areas within the wider industrial area, identification of the area for large scale wind turbine development and the continued retention, development and redevelopment of industrial land could have an effect on these receptors. The next iteration of the Sustainability Appraisal will be supported by a Habitat Regulation Assessment, which will explore the effects of the draft policy on ecological designations and ability to provide mitigation. Until this stage, the effects against Objective 11 have the potential to be significant adverse, but this is uncertain. • Effects against Objective 12 are uncertain and complex. Whilst the draft policy could have positive effects against this Objective by requiring the reservation of Land at Hallen Marsh for habitat mitigation, through proposing allocations on areas of greenfield land that are currently designated as Wildlife Corridors and to a lesser degree, Sites of Nature Conservation Interest, effects could be negative. Further evidence and assessment work needs to be undertaken to establish whether the loss of these designations can be sufficiently mitigated through the Hallen Marsh mitigation area. • As set out against Objective 2 (DMC6) and Objective 6 (DMC14), the area is currently relatively poorly served by public transport, however there is some limited walking and cycling provision (DMC28) . This includes the Number 3 and 10 bus services along the A403, and the number 10 and 11 service along Avonmouth Road; services are typically every 30 minutes and do not serve the areas to the north (such as Land at Chittening Lane or Land at Seabank Power station). In addition, trains are on average every 40 minutes from Bristol Temple Meads to the Severn Beach Line, which is likely to improve with the implementation of MetroWest Phase 1a. The draft policy requires additional work to be undertaken with regard to development considerations for transport and access, and therefore the effects are largely uncertain at this stage for Objective 13 and 14. • A total of 72ha of the entire Avonmouth Industrial Area is within Flood Risk Zone 3b (equating to around 10%), and around 574ha, or around 81% is within Flood Risk Zone 2. The vast majority of the Land at King Weston Lane proposed allocation is within Flood Risk Zone 3b, whilst the remaining three allocations are almost entirely within Flood Risk Zone 3a. Effects against Objective 15 are therefore complex. The draft policy would not positively direct development towards areas of lower flood risk at present (DMC32) and could result in ‘essential infrastructure’ (such as energy uses) being proposed in areas of higher flood risk. Conversely, where industrial, distribution and port uses are proposed (‘less vulnerable uses’), this policy could encourage the location of land uses which are less susceptible to flood risk in areas which are most at risk within Bristol. The effects of the proposed Avonmouth Severnside Enterprise Area on areas of risk must be considered within the next iteration of the SA. • The effects against Objective 16 (DMC35 and DMC36) are unknown and will be subject to the implementation of development and the extent to which sustainability standards are introduced. In addition, there no vulnerable water bodies within the Severn Vale catchment identified as having water quality status as either ‘Poor’ or ‘Bad’ within the Avonmouth area and administrative boundary of Bristol City Council^{76 77}, and therefore it is considered that the draft policy would have a limited potential to improve the water quality baseline. However, retained Local Plan policies would ensure that flood risk and water management is accounted for within new development. In relation to DMC37, Land east of Packgate Road and Land South of Seabank Power Station, Smoke Land (north) and Poplar Way East overlap partially with areas of Agricultural Land Classification Grade 3. This is poorer quality agricultural land and therefore effects are unlikely to be negative. • All Avonmouth employment allocations and the Avonmouth Industrial Area are located outside of AQMAs or cumulative air quality impact zones, and as such, effects against DMC37 are considered to be unknown, being dependent upon other interacting factors such as the type of future development proposed within these allocations and any adjacent sites (e.g. PIWA). • All Avonmouth employment allocations and the Avonmouth Industrial Area are considered to be unknown in their sustainability effects for several decision-making criteria under SA Objective 18 (DMC39, DMC40 and DMC42), based on the extent to which development would implement climate resilient design and use of renewable energy. However, as the draft policy does allow for the development energy uses and wind turbines, this could help the plan achieve a net gain in renewable energy production.
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⁷⁶ Bristol City Council – River Water Quality 2013 Pinpoint Data <https://maps.bristol.gov.uk/pinpoint/>

⁷⁷ Environment Agency Avon Severn Vale Catchment water bodies classification <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3281>

Draft Policy E6 Protecting Living Conditions in Avonmouth Village

SEA Theme	SA Framework Objective	D-M Criteria	Assessment of Sustainability Effects							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
Short	Med	Long								
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in concentrated areas of disadvantage	DMC10 DMC11	+/?	+/?	+/?	I	Both	Local	R: Local built environment. AG: Avonmouth population.	n/a
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	+/?	+/?	+/?	Both	Both	Local	R: Public health. AG: Avonmouth population.	AM: Set out why sectors do not include port operations or distribution uses, which may also cumulatively result in harmful impacts on living conditions within the area.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	0/?	0/?	0/?	I	Both	Local and City-wide.	R: Bristol's local economy and environmental; AG: Local businesses, Bristol's population.	AM: Provide evidence of the 'impact mitigation zone' and what this is based on. AM: Provide detail in relation to 'related forms of development'. AM: As required by the Planning Practice Guidance, prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies (such as this one) is not of a scale that will make the plan undeliverable.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Townscape and Landscape	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local	R: Public health; AG: Bristol's population.	n/a
Transport	14. To maintain and improve the existing highway network	DMC30 DMC31	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	15. To reduce the risk of flooding from all sources	DMC32 DMC33	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Climate, Energy and Waste	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	17. Minimise air and noise pollution	DMC38	+/?	+/?	+/?	Both	Both	Local and city-wide	R: Localised air quality; biodiversity; public health; built environment; AG: population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Evaluation of Effects	<p>Rank / Summary: This draft policy option would require development in the Avonmouth Industrial Area to ensure that it does not have adverse impacts on living conditions in Avonmouth Village. Positive effects are therefore likely for the health and wellbeing of Avonmouth residents, and where the living environment is improved this could reduce health and built environment inequalities.</p> <p>Scale of effects: The effects are likely to be felt at a local scale, specific to residents of Avonmouth village. Effects on proposals for development of industrial, energy or related forms may also be felt, if this results in viability implications for proposals.</p> <p>Assessment of Effects:</p> <ul style="list-style-type: none"> As the proposed development would not impact the ability to provide sufficient housing to meet the identified needs of communities in the city, nor have an effect on the appropriate mix of types of homes, the draft policy option is not considered to be applicable to Objective 1. The draft policy would also have no impact on the ability to re-use previously developed land or prevent loss of greenfield land (Objective 2). The draft policy would also have no impact on the provision of key services (Objective 3 and 9), result in a net gain for community facilities (Objective 4), nor result in a net gain of education facilities or ensure an easy walking distance to educational services (Objective 7). As the policy requires development within the Avonmouth Industrial Area to not have adverse impacts on the living conditions in Avonmouth Village, this could indirectly result in improvements in the built environment (Objective 5, DMC10) of what is a relatively deprived area (ranked in the top 20% overall most deprived neighbourhoods against the overall Index of Multiple Deprivation). Whilst the area does not fall within an Air Quality Management Area, by requiring development does not have adverse impacts on living conditions this could reduce uses which would result in harmful impacts on air quality (Objective 6, DMC12 and Objective 17, DMC38). Not only could reducing harmful impacts and incidents of nuisance create an environment which contributes to more better living 									

- conditions (Objective 6, DMC13), this could indirectly have beneficial effects on positive wellbeing and healthy lifestyles through by creating more pleasant surroundings for walking and cycling (Objective 6, DMC14 and Objective 13, DMC28).
- Conversely, placing additional burdens on industrial, energy or related forms of development may have viability impacts on employment development that could prevent it from coming forward (Objective 8, DMC20). The effect of this policy will therefore need to be assessed through a plan-level viability assessment, to ensure that the total cost of all relevant policies (such as this one) is not of a scale that will make the plan undeliverable.

Draft Policy E7 New workspace within mixed use development

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 – Introduce new policy in relation to new workspace within mixed use development within the Local Plan							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/- / ?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2D MC3 DMC4	0/?	0/?	0/?	I	P	Local and City-wide	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Provide additional detail and clarify definition of 'workspace element to be <u>proportionate</u> to the proposal's scale and location'.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5D MC6D MC7	++/?	++/?	++/?	Both	P	Local and City-wide	As above, plus: R: Bristol's local economy; AG: Local businesses and employees.	CR: Include reference to draft policies in relation to making effective use of land (UL1). AM: Clarify whether the policy applies to GRAs (given it does not apply to allocated sites). MB: Set out appropriate densities for development which incorporate elements of workspace (as part of mixed use developments).
	3. Ensure easy and affordable access to key services	DMC8	?	?	?	I	P	Local and City-wide	R: Bristol's local economy; AG: Local businesses, Bristol's population.	n/a
	4. Increase participation in cultural and community activities	DMC9	?	?	?	I	P	Local and City-wide	R: Bristol's local economy; AG: Local businesses, Bristol's population.	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	?	?	?	Both	Both	Local and City-wide	R: Built environment; public health; AG: Bristol's population.	AM: Consider whether a 'net gain' / 'no net loss' in jobs could be achieved when assessed against the employment intensity of the most recent use. MB: Consider whether a prioritisation could be applied to secure workspace for local SMEs and/or businesses first.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	I	Both	Local and City-wide	R: Public health; AG: Bristol's population.	CR: Draft policies relating to air quality and mitigation requirements. AM: Consider setting out standards for shared open spaces between residents and workspace occupants. AM: Provide additional examples of workspace-type development which is compatible with new residential uses, and guidance on how 'agent of change' principles would apply in new mixed-use developments.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	++/?	++/?	++/?	D	P	Local and City-wide	R: Bristol's local economy; AG: Local businesses, Bristol's employees.	MB: Reference use of workspace by priority employment sectors (as set by the Local Industrial Strategy, and in line with NPPF paragraph 82). AM: For proposals located in less sustainable locations, include requirement for workspace to incorporate carbon offsetting/zero carbon design, with reference to draft climate change policies. MB: Consider whether there are opportunities for workspaces to allow for proportional B2 and B8 uses within mixed-use development, and provide good practice examples of these.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide	R: Cultural heritage; built environment; AG: Bristol's employees and population.	n/a
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	Both	Local and City-wide	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; local wildlife.	n/a
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	I	Both	Local and City-wide	As above.	n/a
	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	?	?	?	I	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	AM: Require appropriate walking and cycling provision, and storage of bicycles, to enable this to be made an attractive and routine method of transport.
	14. To maintain and improve the existing highway network	DMC30 DMC31	0/?	0/?	0/?	I	Both	Local and City-wide	As above, plus R: Bristol's highway network.	AM: Set out the impact of development proposals on the local highway network.
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	I	Both	Local and City-wide	R: Natural environment AG: Bristol's population; local wildlife.	AM: Publish updated evidence in relation to the Strategic Flood Risk Assessment.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	I	Both	Local and City-wide	As above.	n/a
	17. Minimise air and noise pollution	DMC38	?	?	?	I	Both	Local and City-wide	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2. AM / CR: Clarify responsibility of agent of change principles / noise mitigation measures for mixed-use development, and provide guidance on what residential-compatible employment spaces could include.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	I	Both	Local and City-wide	As above.	CR: Draft climate change policies and requirement for associated mitigation within scheme/new workspace design.

Evaluation of Effects	<p>Rank Score: 1 – This draft policy option would require mixed use development to include provision of new workspace where such proposals are located on brownfield sites currently or recently used for business, industry or distribution, however, are not specifically allocated for development. The Option sets out that new workspace should be proportionate to the proposal’s scale and location and have regard to the employment intensity of the most recent use. It requires proposals to consider design, siting and potential occupancy of the future workspace to ensure congruency with the surrounding development uses. The Option also states that retained workspace can include flexible small workspace for SMEs.</p> <p>Scale of effects: This Option would apply to mixed use development not subject to an existing or proposed site allocation across the Plan area. The March 2019 Consultation Version states that this Option is applicable to sites of 0.1 hectares or more within Use Class B1, B2 and B8 or similar sui generis uses. It should be noted that B1 Use Class has since been replaced with Class E(g), while Uses B2 and B8 remain valid.</p> <p>Social, economic and environmental effects: The effects of this Policy Option would be largely limited to the individual building and site level and its immediate surrounds; however, the Option could also create cumulative effects where mixed-use development incorporating new workspace is delivered on existing brownfield sites across the city.</p> <ul style="list-style-type: none"> • While the option references the need to ensure compatibility with surrounding residential development, the policy itself does not specifically address the residential element of mixed-use development and therefore effects are considered to be broadly neutral. However, as the draft policy option requires the ‘workspace element to be proportionate to the proposal’s scale and location’ and ‘recent employment intensity’, it could reduce the level of homes that could be achieved on the site (DMC1). Recommendations could therefore include specifying more detail about what ‘proportionate’ means, or setting out expected average residential densities where mixed-use developments are proposed. • The focus of this policy is to mitigate the effects of the Local Plan seeking to bring forward more brownfield land for housing by promoting the redevelopment of vacant and underused office space. This draft policy would therefore have indirect, significant positive effects for encouraging new development to be space-efficient and by promoting the conservation and wise use of land. By including policy text that sets out that new workspace should be developed on previously developed sites, it is considered that this option could support the reuse or regeneration of brownfield land across the city (DMC5) while protecting existing green spaces and the Green Belt (DMC7). As set out against Objective 1, appropriate densities should be set out for developments which account for elements of mixed-use development. • As this option does not direct development towards any specific location, it is unknown the extent to which this option would enable improved access to key services and/or community facilities (DMC8, DMC9). Some areas which are currently or recently used for business, industry and distribution are not necessarily easily accessible, and therefore overall effects are unknown. • This option could generate direct minor positive effects for SA Objective 5, as it could support improvements to existing brownfield land (DMC10). However, as the draft policy could apply to any sites and premises currently or recently used for business, industry or distribution, effects against DMC10 are also unknown and dependent upon implementation. The extent to which this draft policy could achieve ‘new jobs’ (DMC11) is unclear, and indeed, the policy could look to achieve a ‘net gain’ in jobs based on the previous employment intensity. • Effects of this option when appraised against SA Objective 6 are unknown. Effects could be felt in relation to the development of workspaces within areas that may not be conducive to good health or well-being (for example, in AQMAs), in addition, effects could also be felt in relation to introducing workspaces where more sensitive residential receptors are also proposed. Draft policies should be cross-referenced in relation to mitigation of air-quality impacts, whilst application of ‘agent of change’ in new mixed-use development should be considered. • By requiring mixed use development proposals on non-allocated brownfield sites to include a proportional element of workspace, this option could generate positive effects for SA Objective 8. Benefits are likely to be accrued in particular for DMC17, where this option seeks to encourage the development of new workspace and employment spaces that meet the needs of different business scales. However, this draft policy could also see a reduction in availability of employment spaces for B2 and B8 uses, as these are less likely to be adapted to workspace-types of development. It also remains unclear of the extent to which this draft policy would support opportunities for growth in priority sectors, including those set by the Local Industrial Strategy (LIS); as such, effects against DMC18 are unknown. The extent to which the draft policy could achieve positive effects against DMC19 is unknown, and subject to implementation. Encouraging more localised development of employment spaces may reduce the need to travel, however effects against the remainder of DMC21 are likely to be site-specific and subject to implementation. • Given that this policy specifically addresses the requirement for wider mixed-use development proposals to include new workspace, much of the design would be expected to be policy compliant with draft and retained policies for design and conservation. Therefore, under SA Objectives 10-12, this option is considered to generate unknown effects which would be subject to implementation. • Again, for SA Objective 13 and 14, effects of this policy option are unknown and subject to implementation. As the draft policy applies to areas which are currently or recently used by business, industry or distribution uses, proposals may have a neutral effect on movements – however this is uncertain and will be subject to site-specific circumstances. Where proposals for mixed-use development are located in less accessible areas, mitigation should be required in accordance with adopted and draft policies. • Effects of this policy draft for SA Objective 15 are unknown and will be dependent on location of development and implementation. As workspaces / offices are considered to be a ‘less vulnerable use’, these uses are typically considered to be acceptable in all but areas of Flood Risk Zone 3b. Sequential layout of sites could be considered to avoid areas of greatest risk, which would be guided by retained policies BCS16 and BCAP5. • Against SA Objectives 16 and 18, effects of this option are also unknown, as development proposals may enable opportunities to maximise site-level adaptations, for example through providing micro on-site renewable energy generation or an element of GI to manage higher temperatures. However, this is also linked to the intensification of land use / development and the design of the wider scheme within which new workspace is proposed; and the extent to which other mitigation measures (enabled through Policy CCS2) are enabled. The standard of sustainable design, energy efficiency and construction are unknown; and may not be consistently applied across a site or building level due to factors such as viability or site constraints.
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Draft Policy E8 Digital connectivity and inclusion

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 – Introduce new policy in relation to digital connectivity and inclusion within the Local Plan							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+ / - / ?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2D MC3 DMC4	0/?	0/?	0/?	I	P	Local and City-wide	R: Local housing market, Bristol's population; AG: Bristol's population.	AM: As required by the Planning Practice Guidance, prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies (such as this one) is not of a scale that will make the plan (and ambitions to exceed 33,500 homes) undeliverable.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5D MC6D MC7	0/?	0/?	0/?	I	P	Local and City-wide	As above, plus: R: Bristol's local economy; AG: Local businesses.	n/a
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	D	Both	Local and City-wide	R: Bristol's local economy; AG: Local businesses, Bristol's population.	n/a
	4. Increase participation in cultural and community activities	DMC9	+/?	+/?	+/?	D	Both	Local and City-wide	R: Bristol's local economy; AG: Local businesses, Bristol's population.	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	D	Both	Local and City-wide	R: Bristol's local economy; AG: Local businesses, Bristol's population.	CR: Include reference to role of digital connectivity for employment creation and reducing inequality across the city. MB: Connectivity Statements should include evaluation of how the developer has considered inclusivity within design, affordability and operation of infrastructure and digital providers.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14								n/a
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16								n/a
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	D	Both	Local and City-wide	R: Bristol's local economy; AG: Local businesses, Bristol's population.	n/a
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23								n/a
	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	Both	Local and City-wide	R: Cultural heritage; built environment; AG: Bristol's population.	AM/CR: Retained Policy DM28 mitigation in relation to telecommunications infrastructure, to ensure that any overt / physical infrastructure would not harm the character and appearance of the area; visual amenity or affect designated assets or sites.
Townscape and Landscape	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	Both	Local and City-wide	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; local wildlife.	As above.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	I	Both	Local and City-wide	As above.	As above.
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29								n/a
	14. To maintain and improve the existing highway network	DMC30 DMC31								n/a
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33								n/a
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37								n/a
	17. Minimise air and noise pollution	DMC38								n/a
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42								n/a

Evaluation of Effects	<p>Rank Score: 1 – This draft policy option would introduce new policy in respect of inclusive digital connectivity within the Local Plan and set specific requirements for new development proposals to ensure adequate level of connectivity for future occupants. It would also set a requirement for a Connectivity Statement that addresses the issue of digital and inclusive connectivity within all new development proposals.</p> <p>Scale of effects: This policy could result in the delivery of enabling digital infrastructure of the latest industry standards, which could have cumulative effects for the distribution of the city’s digital infrastructure network.</p> <p>Social, economic and environmental effects: As this option sets out policy that relates to ensuring connection to existing/upgrading of physical digital infrastructure within new developments, the scope of effects against the SA Objectives is considered to be relatively discrete. Where effects of the option are identified, these are expanded upon below.</p> <ul style="list-style-type: none">• While the option is considered to have broadly neutral effects for SA Objective 1 (DMCs 1-4), these are partly unknown. Where development is proposed in areas not already connected to the defined level of digital infrastructure; developers may then be required to make contributions to this connectivity. The effects on viability of this draft policy should be tested at a plan-level.• Similar to appraisal against SA Objective 1, this policy option may bias developers towards existing brownfield sites (DMC5 and DMC7) on the basis that existing digital connectivity maybe more readily available. However, effects are considered to be unknown/neutral for SA Objective 2.• By requiring development to provide enabling infrastructure for digital connectivity, this option could support online access to key services, community facilities, employment opportunities including for areas of deprivation where development is proposed in such areas, to generate minor positive direct benefits across SA Objectives 3, 4 and 5.• This policy option would provide direct benefit for SA Objective 8, particularly for DMC21, where a standardised approach to a requirement for high-quality digital connectivity could foster increased flexibility of work patterns; low-carbon footprints due to ability to work from home and reduced need to travel; as well as enable potential regeneration in areas of poor digital connectivity and low-employment. Given effects are dependent upon the siting of development, and also dependent upon application of other policies in relation to employment, it is considered that effects against this Objective are also unknown.• While development would be expected to be compliant with draft and retained policies for design and conservation, it is noted that this draft policy does not refer to the potential impact upon designated sites and/or receptors in both the natural and historic environment. While the potential for effects is likely to be minor or negligible considering the scale of development, under SA Objectives 10-12 this option is considered to generate unknown effects. Effects are subject to design / scale of infrastructure proposed and its siting with respect to listed assets and designated sites.
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Draft Policies G1 – G4: Assessment of effects of Green Infrastructure Policies

Green Infrastructure

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

Bristol is one of the greenest cities in the UK⁷⁸ with approximately a fifth of the city's land area given over to various forms of open space. Bristol's open space is therefore a core component of the City's urban character and provides an integral component in achieving sustainable development within the Local Authority area. It is acknowledged that the Local Plan therefore has an important role to play in the protection of publicly valued open green spaces within the City.

Based on the SA Scoping Report 2018 and Update Note, key current sustainability issues are identified as:

- Some loss of Sites of Nature Conservation Interest (SNCI) land;
- Poor average existing quality open space within areas of the north west, north and south of the city⁷⁹;
- Uneven access to parks and green spaces across the city compared to the current Standards of Open Space for Recreation⁸⁰, where central and north west areas experience the lowest ratios of provision⁸¹;
- Poor access to children's play space in the north western and south eastern of the city⁸²; and
- An imbalance between the quantity of formal green space provision between areas of the north and south⁸³.

Since the adoption of both the Core Strategy (June 2011) and Site Allocations and Development Management Policies (2014), paragraphs 96 – 101⁸⁴. of the revised National Planning Policy Framework (NPPF, 2019) introduced the concept of 'Local Green Space' (LGS), stating this must only be: designated when a Plan is being prepared or updated; capable of enduring beyond the end of the Plan Period; consistent with the local planning of sustainable development; and, complementary to investment in sufficient homes, jobs and other essential services⁸⁵. The Local Plan Review therefore specifically seeks to introduce an appropriate approach to the designation of Local Green Space in line with revised national policy guidance.

Policies under '*Green Infrastructure*' of the Draft Local Plan are set out in Table 6. The grouped policies under '*Green Infrastructure*' seek to directly meet the requirements of the following Local Plan Objective: '*Protect our valued open spaces to support a liveable, healthy city*'. Indirectly, the grouped policies are also linked to the environmental and public health Objective to '*Tackle the challenges of air quality, obesity and environmental quality*'. The Draft Local Plan makes it clear that the rationale for the introduction of new Green Infrastructure policies are broadly as follows:

⁷⁸ Bristol Biodiversity Action Plan (2015)

⁷⁹ Parks and Green Space Strategy (2008) Appendix 2

⁸⁰ Appendix 1: Standards of Open Space for Recreation.

⁸¹ Parks and Green Space Strategy (2008) Appendix 3.

⁸² Parks and Green Space Strategy (2008) Appendix 5

⁸³ Parks and Green Space Strategy (2008) Appendix 5

⁸⁴ Paragraphs 96 – 101 of the NPPF.

⁸⁵ Paragraph 99 of the NPPF.

- The protection and enhancement of the city’s natural environment will continue to be a core aspect of the Local Plan; and
- It is essential that alongside development, the Local Plan seeks to conserve open space infrastructure such as parks, playing fields, nature reserves and green lungs of natural space.

In the Draft Local Plan, new policies proposed would replace the existing Important Open Space designation (under specific parts of existing Policy DM17) within the Site Allocations and Development Management Plan (SADMP). Retained Policy DM16 Open Space for Recreation, which sets the Local Plan’s standards for open space provision in decision-taking, alongside Policy DM17 Development involving existing green infrastructure, would inform the implementation of Draft Policies GI2 and GI3.

A detailed assessment methodology underpinning the draft policy designations is set out in the BCC New Protection for Open Spaces Paper (March 2019 and 2020 Update).

Table 6 Relationship with other relevant plans and programmes

Draft Policy	NPPF	Retained Policies	Evidence
Draft Policy GI1: Local Green Space	Para 99 - 101	<ul style="list-style-type: none"> • Local Green Space designated through Neighbourhood Plans • Policy DM15 Green Infrastructure Provision • Policy DM16 Open Space for recreation • Policy DM17 Development involving existing green infrastructure • Policy DM19 Development and Nature Conservation • Policy DM20: Regional Important Geological Sites • Policy DM21: Development of Private Gardens • Policy DM22: Development Adjacent to Waterways • Policy BCAP22: Habitat preservation, enhancement and creation on waterways • Policy BCAP23: Totterdown Basin enhancement • Policy BCAP24: The St. Paul’s Green Link • Policy BCS9 Green Infrastructure • Policy BCAP25: Green infrastructure in city centre developments 	BCC New Protection for Open Spaces Paper (March 2019 and 2020 Update).
Draft Policy GI4: Stapleton Allotments and Holdings – Food Growing Local Green Space			
Draft Policy GI2: Reserved Open Space	Glossary definition ‘Open Space of Public Value’ Para 96.		Parks and Green Space Strategy (2008).
Draft Policy GI3: Incidental Open Spaces	Para 96		

Stage 2: Identify and describe realistic alternatives

In light of the above discussion, alternatives considered for each of the draft policies under the ‘Green Infrastructure’ Policy Theme are set out and elaborated in turn below.

Draft Policy GI1 Local Green Space

Option 1 No new policy in relation to Local Green Space (outside Neighbourhood Development Plan areas)

This option is effectively the “policy off” alternative, which would result in a reliance upon the existing adopted Core Strategy / SADMP policy approaches only (detailed within Policy BCS9 of the Core Strategy and Policies DM15-22 of the SADMP). Open spaces would instead continue to be protected under Important Open Space Policy BCS9, however a reference to the new concept of Local Green Space would be included within revised policy text for Open Space.

Since the Core Strategy and SADMP was adopted, national policy has introduced the concept of Local Green Space designations. This allows local and neighbourhood plans to identify and protect

areas of particular importance to them. In order to comply with the policy requirements of the NPPF, this was not carried forward for reasonable alternative assessment.

Option 2 Designate Local Green Space areas within the new Local Plan to protect areas of ‘demonstrably special’ value to the local community

This option is based upon the requirements of the revised NPPF (Paragraphs 99 - 101) and NPPG. It would seek to designate Local Green Space within the new Local Plan (the ‘March 2019 Consultation Option’), following detailed assessment method first set out within the New Protection for Open Space Paper.

Providing equal levels of protection to Policy GI1, Policy GI4 makes explicit reference to the designation of a Local Green Space on the Stapleton Allotments for the overriding importance for food-growing at this location. Since the March 2019 consultation, existing policies for safeguarding of the Park and Ride off the M32 (Policies BCS10 and DM24) on the Stapleton Allotments site are no longer considered justified. It is therefore appropriate to incorporate the policy provisions set out in Draft Policy GI4 in respect of Stapleton Allotments and Holdings within the assessment of this alternative.

Reasonable Alternative	Yes
Rationale	By recognising the new role of Local Green Spaces and those designated through NDP process, this approach would be compliant with the requirements of the NPPF and PPG. The number and location of Local Green Space designations would be dictated by the methodology within NPOS (2018) ⁸⁶ .
Recommendations for Evidence Update	Updates to New Protection for Open Space Evidence.

Draft Policy GI2: Reserved Open Space

Option 1 No new policy in relation to Reserved Open Space within the Local Plan

This option is effectively the “policy off” alternative, which would result in a reliance upon the retained Core Strategy / SADMP policy approaches only (detailed within Policy BCS9 of the Core Strategy and Policies DM15-22 of the SADMP). Open spaces would continue to be protected under Policy BCS9 Green Infrastructure.

Given the consultation undertaken to date on the policy concept of Reserved Open Space as part of both the Draft Local Plan February 2018 Consultation version and consulted on as part of March 2019 Consultation, it is not considered reasonable to carry this option forward.

Option 2 Designate Reserved Open Space within the Local Plan to protect ‘open spaces of public value’

This option would include the Reserved Open Space policy (the ‘March 2019 Consultation Option’), which would result in protection of green spaces that represent an ‘open space of public value’. Development would be refused where it would result in loss of such land, unless particular ‘exception tests’ can be evidenced which reflect Retained Policy DM16. This would be reliant on a

⁸⁶ New Protection for Open Space Paper (2018)

city-wide appraisal of open green spaces against local assessment criteria in order to value sites for ROS designation.

Reasonable Alternative	Yes
Rationale	This option would be compliant with the NPPF definition of open space as ‘all open spaces of public value’.
Recommendations for Evidence Update	Refresh the existing BCC Parks and Green Space Strategy and Playing Pitch Strategy, to support implementation of Retained Policy DM16 Open Space for recreation. Local Plan standards for open space provision will be updated as associated evidence (such as population projections) is made available. Updates to New Protection for Open Space Evidence.

Draft Policy GI3: Incidental Open Spaces

Option 1 No new policy in relation to Incidental Open Space within the Local Plan

This option is effectively the “policy off” alternative, which would result in a reliance upon the existing adopted Core Strategy / SADMP policy approaches only (detailed within Policy BSC9 of the Core Strategy and Policies DM15-22 of the SADMP).

As discussed above under options for Draft Policy GI2, given the consultation undertaken to date on the policy concept of Local Green Space and Reserved as part of Draft Local Plan February 2018 Consultation version and consulted on as part of March 2019 Consultation, it is considered necessary to introduce an updated policy that would seek to protect the city’s non-designated green infrastructure. It is therefore not reasonable to carry this option forward.

Option 2 Introduce Incidental Open Space policy to protect amenity green spaces

This option would include the Incidental Open Space policy (the ‘March 2019 Consultation Option’), which would provide separate policy provisions for smaller open spaces considered to be supplementary in nature. This option would therefore provide a specific requirement to prevent loss of such space to development, where it is found to hold local value for townscape or visual amenity.

Reasonable Alternative	Yes – in combination with GI1 and GI2 March 2019 Consultation Draft policies.
Rationale	Additional green space designations were first proposed as part of Draft Local Plan February 2018 Consultation version and consulted on as part of March 2019 Consultation. This option would also be compliant with the NPPF, as it does not define scale of open spaces required to be protected by Local Development Plans.
Recommendations for Evidence Update	Update evidence to support retained policies BCS9 and DM15.

Draft Policy GI4: Stapleton Allotments and Holdings – Food Growing Local Green Space

Reasonable alternatives of options in relation to Draft Policy GI4 are assessed against Draft Policy GI1.

Stage 3: Assessment and evaluation of effects

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

- The assessment of alternative options set out above are reliant on an emerging evidence base for the assessment of green spaces, being informed by the methodology / findings of the New Protection for Open Spaces Paper - March 2019.
- The evidence base relies upon a relatively dated Parks and Green Space Strategy and Playing Pitch Strategy, which is the current baseline for green space provision / condition within the city. This evidence base will require a future update to aid the identification of any additional sustainability issues that the Local Plan ought to address.

Summary of assessment findings

Selected Approach for GI1 Policy - Option 2

Policy Option 2 would address gaps in Local Green Space coverage, including areas without adopted NDPs, and would apply a consistent methodology to the designation of LGS at a city-wide level. Policy Option 2 would allow communities across the city to recommend sites for protection and would have greater potential to protect and enhance existing green space assets within community. This approach would afford stronger levels of policy protection to existing green spaces within the City and maximise opportunities for synergistic benefits across the Plan area.

National policy provisions for LGS indicate these designations have a status similar to Green Belt. The introduction of LGS designations at city-wide level could therefore reduce the scale and flexibility of land available for housing or employment development (and by proxy, the quantity of affordable housing or employment) in the long term, which could lead to minor negative effects for these SA Objectives 1 and 8. The scale of this effect is likely to be very minor in the short term, however, as these spaces are predominantly open space at present.

Selected Approach for GI2 Policy – Option 2

Policy Option 2 would encourage positive protection of green spaces where they have a defined function and considered valuable by the public.

As this option sets out that loss of open space is permissible when it can be demonstrated that it is no longer required for its open space function, or a deficiency of open space provision would not be created through its loss, the overall effect on Objective 1 and 8 is more likely to be neutral or uncertain.

In combination with Draft Policy GI1 (Local Green Spaces) and retained policies, Policy Option 2 would likely provide a synergistic benefit for both SA and Local Plan objectives, including to prioritise brownfield development within the city and improve Bristol's health and wellbeing baseline. Through applying a 'second-tier' designation to protect valued Green Infrastructure and Open Spaces, this Policy Option would improve the current approach set out in the adopted Local Plan and likely deliver both direct and indirect benefits.

Selected Approach for GI3 Policy – Option 2

While both Policy Options for GI3 are comparable in terms of likely sustainability effects, Policy Option 2, introduction of new policy wording regarding 'Incidental Open Spaces' would enable opportunities for beneficial cumulative sustainability effects to be better realised across the city with

regards to air quality, climate change resilience, biodiversity, and natural flood management across the Local Plan area, particularly where carried forward with retained policies. In view of the above, BCC's Preferred Approach is to progress Option 2.

Grouped Policy Theme Recommendations

- The grouped policies should reference the West of England's Joint Green Infrastructure Strategy⁸⁷ to ensure coordinated delivery of strategic green infrastructure;
- It is recommended that the Local Plan include reference to existing supporting Strategic Green Infrastructure Network (Diagram 3.1 of Core Strategy – Retained Policy BCS9) or any future refresh of such strategic network; and
- Mitigation under all Policy Options would be directed by retained policies BCS9 – it is recommended that this is refreshed to reflect latest evidence base information with regards to Green Infrastructure and Open Space and includes mitigation in the form of biodiversity net gain.

⁸⁷ <https://www.westofengland-ca.gov.uk/wp-content/uploads/2020/07/Joint-Green-Infrastructure-Strategy-%E2%80%93-June-2020..pdf>

Draft Policy G11 Local Green Space – incorporating Draft Policy G14

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Designate Local Green Space areas within the new Local Plan to protect areas of 'demonstrably special' value to the local community							
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	?	-	-/?	I	P	Local and City-wide	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Include reference to NPPF para 99, which requires LGS to be reviewed as part of any future Local Plan update, and to be consistent with local planning for sustainable development (NPPF paragraph 99). MB: Clarify within Draft Policy G11 the principles of 'harm' to LGS characteristics, role and harm, alongside 'proportional scale'.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	+	+	+	I	P	Local and City-wide	As above, plus: R: Bristol's local economy; AG: Local businesses.	MB: Explain how designation of LGS could encourage recycling of other urban land.
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	4. Increase participation in cultural and community activities	DMC9	+	+	+	I	P	Local and City-wide	R: Cultural heritage, public health; AG: Bristol's population.	AM: Consider circumstances where ancillary development would be enabled within LGS spaces.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those in areas of concentrated disadvantage	DMC10 DMC11	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	+	+	+	D	P	Local and City-wide	R: Public health. AG: Bristol's population.	AM: Access to open space to be informed by updated PGSS. AM: Clarify link to retained policy DM16 setting out Local Plan standards. MB: Reference benefits to health and well-being, including that provided by recreational food growing.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	?	-	-/?	I	P	Local and City-wide	R: Bristol's local economy, AG: Local businesses, Bristol's population.	AM: Include reference to NPPF paragraph 99.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	+	+	+	D	P	Local and City-wide	R: Cultural heritage; built environment; AG: Bristol's population.	AM: Enable ancillary development that would not harm LGS special character and role (Green Belt purposes, NPPF paragraph 134).
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	+	+	+	D	P	Local; City-wide; trans-boundary	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	As above. AM: Reference to delivery of biodiversity net gain for any loss of LGS.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space / recreation	DMC27	+	+	+	D	P	Local; City-wide; trans-boundary	As above.	AM: Loss of GI should be replaced where it would enhance cohesive GI network, as set out within updated PPG ⁸⁸ . MB: Include reference to supporting Strategic Green Infrastructure Network (Core Strategy Diagram 3.1 – Retained Policy BCS9) to ensure benefits of multi-functional green infrastructure is maximised.
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	14. To maintain and improve the existing highway network	DMC30 DMC31	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	+	+/?	+/?	I	P	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Development of LGS to account for local/strategic flood risk.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	+	+/?	+/?	I	P	Local; City-wide; trans-boundary	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: Uncertainties in relation to water quality/resources to be addressed directly via other draft Local Plan / retained policies. MB: Reference role of sustainable food growing and protection of ecosystem services.
	17. Minimise air and noise pollution	DMC38	+	+	+	I	P	Local and City Wide	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	n/a
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+	+	+	I	Both	Local and City Wide	As above.	MB: Reference to role of GI for climate change resilience. CR: Draft climate change policies.

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

Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would allow a strong level of protection for spaces designated LGS as identified in the NPPF, including areas outside adopted NDPs. This Option will apply to those green spaces that meet the criteria set out in the NPPF and which generally do not already benefit from a high level of protection through other designations (e.g. Green Belt). This Policy Option would permit ancillary development of proportional scale.</p> <p>Scale of effects: Option would therefore potentially produce positive benefits where Local Green Spaces are identified beyond the NDP areas. The location and dispersal of Local Green Spaces is dependent on sites achieving the values set out within the NPPF.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • National policy provisions for LGS indicate these designations have a status similar to Green Belt. The introduction of LGS designations at city-wide level could therefore reduce the scale and flexibility of land available for housing or employment development (and by proxy, the quantity of affordable housing or employment) in the long term, which could lead to minor negative effects for these SA Objectives 1 and 8. The scale of this effect is likely to be very minor in the short term, however, as these spaces are predominantly open space at present. As the location of Stapleton Allotments is currently Green Belt, there would be a neutral effect on housing and employment objectives as this would generally be considered inappropriate development at this location. Whilst LGS designations are expected to be retained beyond the Plan Period, there is a requirement to review these – therefore long-term effects in this regard are uncertain. • Conversely, LGS policy would afford strong protection to selected greenfield land and therefore should indirectly provide a synergistic benefit to the promotion of brownfield land (SA Objective 2, DMC7). • This policy option may have a positive effect on participation in cultural and community activities on the basis that Local Green Spaces should be demonstrably special to the community. • Designation of LGS within areas of deprivation would protect existing spaces, support healthy lifestyles and could attract future funding locally, which may therefore indirectly benefit the built environment in the medium-longer term. However, it should be noted that it is not GI1 itself, but the retained policies (policy DM16) which would ensure that standards of provision are met in areas of deprivation. • Land at Stapleton Allotments falls within the Stapleton and Frome Valley Conservation Area, and designation as LGS could therefore have positive effect on SA Objective 10. In addition, one of the ‘criteria’ for designation is the ‘historical significance’ of spaces; many LGS are designated for this purpose. • This Option would likely provide minor indirect benefits for SA Objectives 11, 15 and 18, as a secondary effect of the protection of public open space is that it contributes to GI functions. Benefits for flood mitigation and climate resilience would be localised in effect but could cumulatively have an important city-wide effect. • The effects of this Policy Option for flood risk (SA Objective 15) and sustainable resource management (SA Objective 16) could provide indirect benefit where spaces ensure protection of water quality, natural habitats and natural flood risk management. However, this is dependent on location of LGS designations, and would vary on a site-by-site basis. At a site-specific level, Stapleton Allotments and Holding is located within Flood Risk Zone 1. Retaining the site as allotments is more likely to support positive effects for Objective 16. • LGS designation would support sustainable urban food production (DM37) where evidenced as ‘demonstrably special’ as in the case for Stapleton Allotments and Holdings. Noting the Grade 1 Agricultural Land Classification, the benefits of this site being designated as Local Green Space would achieve significant positive effects for food growing across the city. • Indirect benefits could also be realised with this Policy Option under SA Objective 18 through the ability of permanent LGS spaces to minimise urban heat island effects, however this is dependent on both scale, distribution and the characteristics of the immediate built environment.
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Draft Policy GI2 Reserved Open Space

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Designate Reserved Open Space within the Local Plan to protect 'open spaces of public value'							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/- / ?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	?	?	?	I	T	Local and City-wide	R: Local housing market, Bristol's population; AG: Bristol's population.	AM: Supporting evidence to demonstrate where development may be appropriate on an ROS or why an open space designation has been removed. MB: Clarify 'proportional scale' and 'harmful impact'.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	+/?	+/?	+/?	I	T	Local and City-wide	As above, plus: R: Bristol's local economy; AG: Local businesses.	As above. CR: Reference to Urban Living principles which supports brownfield development.
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	4. Increase participation in cultural and community activities	DMC9	+/?	+/?	+/?	D	T	Local and City-wide	R: Cultural heritage, public health; AG: Bristol's population.	MB: Similar to GI1, consider enabling ancillary development within ROS spaces for community uses where function/role is supported.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those in areas of concentrated disadvantage	DMC10 DMC11	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	+	+	+	D	T	Local and City-wide	R: Public health; AG: Bristol's population.	MB: Access to open space to be informed by NPOS evidence base and updated PGSS, to ensure equitable access. Reference benefits to health and well-being within the policy. CR: Ensure link to retained policy DM16 setting out Local Plan standards.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	?	?	?	I	T	Local and City-wide	R: Bristol's local economy; AG: Local businesses, Bristol's population.	AM: Demonstrate where development may be appropriate on an ROS or why an open space designation has been removed. .
Economy and Employment	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	+/?	+/?	+/?	I	T	Local and City-wide	R: Cultural heritage; built environment; AG: Bristol's population.	AM: Reference to historic environment for appropriate development of Open Spaces.
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	+	+/?	+/?	D	T	Local; City-wide; trans-boundary	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; local wildlife.	AM: 'Open space function' should be further defined. Consideration should be given as to whether policy text could also be expanded to include biodiversity net gain, required by the 25-Year Environment Plan and forthcoming Environment Bill.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+	+/?	+/?	D	T	Local and City-wide	As above.	AM: Reference to latest quality, access and quantity standards for open space. AM: Loss of GI should be replaced where it would enhance cohesive GI network, as set out within updated PPG ⁸⁹ . MB: Include reference to supporting Strategic Green Infrastructure Network (Core Strategy Diagram 3.1 – Retained Policy BCS9) to ensure benefits of multi-functional green infrastructure is maximised.
Townscape and Landscape	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	n/a	n/a	n/a	n/a	n/a	n/a	n/a	MB: See above – opportunities to maximise Green Infrastructure.
	14. To maintain and improve the existing highway network	DMC30 DMC31	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	15. To reduce the risk of flooding from all sources	DMC32 DMC33	+/?	+/?	+/?	I	T	Local; City-wide; trans-boundary.	R: Natural environment (water and land). AG: Bristol's population; local wildlife.	MB: Development of ROS to account for local/strategic flood risk to achieve multi-functional green space benefits.
Transport	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	+/?	+/?	+/?	I	T	Local and City Wide	As above.	MB: Protection of allotment land to include statutory allotment provisions.
	17. Minimise air and noise pollution	DMC38	+	+/?	+/?	I	T	Local and City Wide	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	n/a
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+	+/?	+/?	I	T	Local and City Wide	As above.	MB: Reference to role of GI for climate change resilience. CR: Draft climate change policies.

⁸⁹ MHCLG (2019). Planning Practice Guidance. Paragraph: 005 Reference ID: 8-005-20190721

Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would allow for protection of particular locally valued green spaces in accordance with a local interpretation of the NPPF glossary of ‘open space of public value’. This Option would supersede the existing ‘Important Open Space’ policy designation. Draft policy wording for GI2 (‘March 2019 Consultation Option’ – this Option) sets out that development proposals would need to fully justify and demonstrate clearly why the space is no longer needed for an open space purpose; and that Reserved Open Spaces will be re-assessed during of future reviews of the Local Plan and may be reviewed through any new neighbourhood plans. This Policy Option would also rely upon provisions within existing development management policies to ensure that significant open space is designated and protected.</p> <p>Scale of effects: This Option would apply to green spaces across the Local Authority Plan Area that both meet the definition set out in the NPPF and score positively against local criteria. The scale of effects would be predominantly localised and attributable to the individual site level; however, this Option would likely also create city-wide effects due to the cumulative effect of designations, which may be either be dispersed or agglomerated in spatial terms.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none">• Introduction of ‘Reserved Open Space’ as a protective policy, could have a negative impact on Objective 1 and 8 by limiting opportunities for development of land for housing or employment uses. However, as loss of open space is permissible when it can be demonstrated that it is no longer required for its open space function, or a deficiency of open space provision would not be created through its loss, the overall effect is likely to be more neutral. The effect is uncertain as it is currently unclear the extent of spaces that will be able to justify this loss.• This Policy Option could encourage positive protection of valued green spaces, which in combination with retained policies could conversely encourage the prioritisation of brownfield development under SA Objective 2.• A net gain of community facilities could be delivered through this Policy Option, given the supportive provisions for ancillary development set out in Draft Policy GI2, although this would be an indirect, uncertain positive effect against SA Objective 4.• Designation of ROS within areas of deprivation could protect existing spaces and could attract future funding and investment locally and therefore indirectly benefit the built environment in the medium-longer term in such areas. However, it should be noted that it is the retained policies (policy DM16) which are referenced within the policy text would ensure that standards of provision are met in areas of deprivation (SA Objective 6).• There is insufficient justification within the policy text to determine what the ‘open space function’ is. Therefore, the effect on historic environment or nature conservation is unclear at this stage (Objective 10 and 11), however these are likely to be positive – this effect is uncertain in the medium to long term on the basis that ROS designations can be reviewed.• Similar to Option 1, this Option would support existing sustainable urban food production (DMC37 of SA Objective 16) and healthy lifestyles (SA Objective 6) through the protection of statutory allotments and community food growing areas.• This Option would likely provide minor indirect benefits for SA Objectives 11, 15 and 18, as a secondary by-product of the protection of public open space that contributes to GI function. Benefits for flood mitigation and climate change resilience would be localised in effect, although may produce city-wide effects where located in areas of flood risk or dense urban development. Given that draft Policy GI2 does not seek to directly meet these objectives and that spaces would be reviewed regularly through the Local Plan, indirect effects in the medium-long term are unknown, with opportunities for potential benefit to be maximised.
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Draft Policy GI3 Incidental Open Space

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce Incidental Open Space policy to protect amenity green spaces							
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	+	+/?	+/?	I	T	Local	R: Public health; AG: Bristol's population.	MB: Reference benefits to health and well-being within the policy.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	+/?	+/?	+/?	I	T	Local and City-wide	R: Cultural heritage; built environment; AG: Bristol's population.	CR: Include reference to retained and draft policies that promote conservation of historic environments/cultural heritage.
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	+	+/?	+/?	I	T	Local; City-wide; trans-boundary.	R: Local wildlife, biodiversity; natural environment, including geodiversity; AG: Bristol's population; local wildlife	MB: Reference to delivery of biodiversity net gain for any loss of open space via ancillary development.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+	+/?	+/?	I	T	Local and City-wide	As above.	AM: Reference to latest quality, access and quantity standards for open space. AM: Loss of GI should be replaced where it would enhance cohesive GI network, as set out within updated PPG ⁹⁰ . MB: Include reference to supporting Strategic Green Infrastructure Network (Core Strategy Diagram 3.1 – Retained Policy BCS9) to ensure benefits of multi-functional green infrastructure is maximised. MB: Emphasise the future role of IOS within areas identified within the Development Strategy policies. MB: See above – opportunities to maximise Green Infrastructure.
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	14. To maintain and improve the existing highway network	DMC30 DMC31	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	+/?	+/?	+/?	I	T	Local and City-wide.	R: Natural environment (water and land). AG: Bristol's population; local wildlife.	CR: Other retained policies address flood risk, however open spaces have an indirect role in reducing risk. MB: Reference to role of GI in natural flood management.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	17. Minimise air and noise pollution	DMC38	+/?	+/?	+/?	I	T	Local and City Wide	R: Localised air quality; biodiversity; public health; built environment. AG: Bristol's population; local wildlife.	CR: Other retained policies address air quality, however open spaces have an indirect role in reducing risk.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+/?	+/?	+/?	I	T	Local and City Wide	As above.	MB: Reference to role of GI for climate change resilience. CR: Draft Climate change policies.

⁹⁰ MHCLG (2019). Planning Practice Guidance. Paragraph: 005 Reference ID: 8-005-20190721

Evaluation of Effects	<p>Rank Score: 1 Under this Policy Option, Incidental Open Spaces would not be identified however this policy approach would complement proposed GI1 and GI2, providing a 'catch all' to ensure sustained and positive green space protection within development management. However, it is acknowledged that the policy provisions for Incidental Open Space and Unidentified Open Space (as set in the SADMP) are comparable – the key difference is the supporting policy text, which sets out that these spaces are important for their supplementary role and defines how such spaces may retain integrity of the build environment or provide smaller recreational space.</p> <p>Scale of effects: As per Option 1, this Option would produce effects linked to green space sites across the Local Authority Plan Area. The scale of effects would be predominantly localised and attributable to individual sites; however, this Option would likely also create city-wide effects due to the cumulative effect of protection.</p> <p>Social, economic and environmental effects: This Option seeks to preserve incidental areas of open space which when considered in combination with other open space policies and would create minor benefits for SA Objectives 6, 11, 12, 15, 17 and 18.</p>
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Draft Policies T1 -T5: Assessing the Effects of Transport Policies

Transport

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

Based on the SA Scoping Report 2018 and Update Note 2020, key sustainability issues are identified as follows:

- Transport is responsible for 32% of carbon dioxide (CO₂) emissions in the West of England, compared to 26% nationally⁹¹;
- Transport linked CO₂ emissions are likely to 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 level⁹²;
- The annual cost of congestion within the region is estimated to be £300m⁹³;
- Increased uptake of cycling as a mode of transportation within the city, doubling in use over the last 10 years⁹⁴;
- Congestion continues to impede movement, particularly in the city centre, and compromises air quality in AQMAs as the biggest contributor to exceedances; and
- A need for new infrastructure that enables a modal shift towards sustainable transport, particularly future transport modes such as electric vehicles (EVs), and for development to better integrate with new transport infrastructure.

At a strategic level, the West of England JSP originally established policies for transport within the West of England using the Joint Transport Study (JTS) evidence base, which identified potential strategic transport proposals for delivery up to 2036. Given the withdrawal of the West of England JSP, it will be necessary to reconsider future alternatives linked to the strategic delivery of transport infrastructure associated with the new strategic plan – the WECA Spatial Development Strategy.

The West of England Joint Local Transport Plan 4 (JLTP4)⁹⁵ was in production during the March 2019 Consultation Draft and adopted in March 2020. It will operate alongside the new Local Plan to deliver linked objectives for transport up to 2036 and beyond. 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.

The West of England Local Industrial Strategy⁹⁶ also establishes strategic objectives to ensure communities are connected to jobs, training and services in a sustainable and low carbon way, addressing air quality and improving health. Central to both the Local Industrial Strategy and the JLTP4 are the objectives of clean and inclusive growth.

The Local Cycling and Walking Infrastructure Plan⁹⁷ was also in production during the March 2019 Consultation Draft and adopted in June 2020. It forms new transport-based policy for the West of

⁹¹ Joint Local Transport Plan 4 2020-2036

⁹² Ibid. (2020).

⁹³ Ibid. (2020).

⁹⁴ Ibid. (2020).

⁹⁵ <https://s3-eu-west-1.amazonaws.com/travelwest/wp-content/uploads/2020/04/Adopted-Joint-Local-Transport-Plan-4.pdf>

⁹⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/818989/1907_VERSION_West_of_England_Interactive_SINGLE_PAGES.pdf

⁹⁷ <https://s3-eu-west-1.amazonaws.com/travelwest/wp-content/uploads/2020/04/Adopted-Joint-Local-Transport-Plan-4.pdf>

England Region, and aims to ensure cycling and walking are the preferred choices for shorter trips, alongside better access to public transport across the region.

Locally, the Bristol Transport Strategy⁹⁸, adopted in 2019, focuses the aims of the JLTP4 a city-level and sets out the vision and ambition for transport in the city up to 2036. The Strategy sets out the need for transport improvements to: accommodate inclusive growth in housing, jobs and regeneration; create healthy places and improve local air quality by reducing carbon emissions; make efficient use of streets; support cleaner movement of goods/services within the transport network; and enhance local centres and high streets. Each of these objectives accord with the sustainable transport requirements set out within the NPPF (namely, paragraphs 102 – 104) and are pertinent to the development of draft policies for transport within the Local Plan.

Alongside preparation of the Local Plan, BCC has developed the Outline Business Case (OBC) of the clean air plans, to include the proposed Traffic Clean Air Zone (CAZ). Following approval by Cabinet in November 2019, the plans were submitted to the Joint Air Quality Unit (JAQU). BCC is working closely with the JAQU to meet the deadline for implementation of the plan in March 2021, which when adopted will impose new private vehicle diesel ban and vehicle charging zone areas within Bristol.

Other relevant national strategies include the recent Energy White Paper 2020⁹⁹, which sets out plans for zero emission vehicles and the ban on petrol and diesel cars, alongside ambitions for green public transport, cycling and walking. In addition, the Clean Growth Strategy (2017)¹⁰⁰ and the Road to Zero Strategy (2018)¹⁰¹ outlines the Government's proposals to accelerate the shift to low-carbon transport within the context of economic growth underpinned by the UK's Industrial Strategy.

In addition, the national Transport Decarbonisation Plan (TDP) is currently being developed by the Government¹⁰², and is expected for final publication in Spring 2021. The TDP will outline cross-sector requirements to deliver the emissions reduction required across all modes of transport, to achieve carbon budgets and net zero emissions by 2050.

Related to ambitions for decarbonisation, The Automated and Electric Vehicles Act (2018)¹⁰³ shows a clear commitment from the UK Government to ensure the regulation of EV infrastructure. Since the production of the March 2019 Consultation Draft, the national Rapid Charging Fund was announced in the March 2020 Budget as part of a £500 million commitment for EV charging infrastructure; and

⁹⁸ <https://www.bristol.gov.uk/documents/20182/3641895/Bristol+Transport+Strategy+-+adopted+2019.pdf/383a996e-2219-dbbb-dc75-3a270bfce26c>

⁹⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945899/201216_BEIS_EWP_Command_Paper_Accessible.pdf

¹⁰⁰ The Clean Growth Strategy: Leading the way to a low carbon future.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/700496/clean-growth-strategy-correction-april-2018.pdf

¹⁰¹ The Road to Zero: Next steps towards cleaner road transport and delivering our Industrial Strategy.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf

¹⁰² 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

¹⁰³ <https://www.legislation.gov.uk/ukpga/2018/18/contents/enacted>

changes were made to permitted development rights, effective as of 25 May 2019¹⁰⁴, to include an amendment to the planning restriction on the installation of electric vehicle charging points.

Policies under ‘Transport’ chapter of the Draft Local Plan are set out in Table 7. The grouped policies under this theme seek to meet the requirements of the following Local Plan Objectives to:

- ‘Promote urban living across the city with a focus on brownfield land – encouraging developments of homes with urban character form and design in well-designed, connected, healthy and accessible neighbourhood which achieve a liveable environment’; and
- ‘Tackle the challenges of air quality, obesity and environmental quality’.

The Draft Local Plan makes it clear that the main objectives of ‘Transport’ policies are broadly as follows:

- To set out set out general transport development principles;
- To provide for safeguarding of any routes that may need to be kept available for transport schemes; and
- To address the approach to parking in residential development, cycle parking at office spaces, and the increased need for requirements for electric vehicle charging.

While retained Local Plan policies will continue to provide an effective framework for the management of transport development proposals, the Draft Local Plan proposes new policies to:

- Align with principles and policy set by the new JLTP4;
- Respond to the approach to Urban Living within the city, which aims to minimise the need for travel through siting development in sustainable locations; and
- Update the Local Plan with respect to provision of electric and other low-emission vehicle infrastructure, where draft policy is proposed to replace the existing requirements for provision of electric vehicle charging points within the adopted Local Plan’s Parking Standards Schedule.

The current situation is informed by proposals to retain Policies DM23, DM25, and BCAP26 and BCAP29 which establish the Local Plan’s approach to transport development management, reducing congestion and the provision of car and cycle parking in the City Centre. These retained policies would inform the implementation of Draft Policies T1-T5 within the new Local Plan.

Table 7 Relationship with other relevant plans and programmes

Draft Policy	NPPF	Other legislation or guidance	Retained Policies	Evidence
Draft Policy T1: Development and transport principles	Paras 102 -107	Highways Act 1980 Traffic Management Act 2004 New Road and Street Works Act 1991 DfT Circular 02/2013 – The Strategic Road Network and the Delivery of Sustainable Development	Retained Policy DM23: Transport development management	West of England Joint Local Transport Plan 4 (2020). Joint Transport Study (JTS) (2017) ¹⁰⁵ West of England Local Cycling and Walking Infrastructure Plan (2020)
Draft Policy T2: Transport schemes			Retained Policy DM25: Greenways	
Draft Policy T3: Car and cycle parking provision for residential development:			Retained Policy BCAP26: Old City- Reducing traffic in the heart of Bristol	
Draft Policy T4: Cycle parking provision for B1				

¹⁰⁴ The Town and Country Planning (Permitted Development, Advertisement and Compensation Amendments) (England) Regulations 2019 [effective 25th May 2019].

¹⁰⁵ <https://www.bristol.gov.uk/documents/20182/33167/Joint+transport+study/a34b16f2-821f-cc04-51f5-7e030c328c3d>

office development			City Centre Retained Policy BCAP29: Car and cycle parking in Bristol City Centre	Bristol Transport Strategy (2019)
Draft Policy T5: Provision of infrastructure for electric and other low emission vehicles	Para 105 (e)	Automated and Electric Vehicles Act (2018). Part 2, Class E of the GPDO 2015 (as amended) ¹⁰⁶ .		

Stage 2: Identify, define and describe alternatives

In light of the above discussion, alternatives considered for each of the draft policies under the ‘Transport’ Policy Theme are set out below.

Draft Policy T1: Development and transport principles

Option 1 No new policy in relation to development and transport principles

Given the change to the current situation including the introduction of Urban Living approach within the new Local Plan and the need to conform with strategic level plans in place at the time of the March 2019 draft, alongside key sustainability issues as set out above, a no new policy option was not considered a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to development and transport principles

This option would introduce an additional policy for the principles of transport development (the ‘March 2019 Consultation Option’) for consideration in all new proposals for development. The overarching aim of this policy is to reinforce the Plan’s Urban Living principles to minimise the need for travel by car, while maximising opportunities for active travel and public transport.

It would include new requirements for development proposals to:

- Be located where sustainable travel patterns can be achieved, with more intensive, higher density mixed use development at accessible locations and along or close to main public transport routes;
- Minimise the need to travel by private car and maximise opportunities for walking, cycling and public transport;
- Be designed and located to ensure the provision of safe, walkable streets;
- Reduce as far as possible the negative impacts of vehicles such as excessive volumes, fumes and noise;
- Create places and streets shaped by the needs of pedestrians, cyclists and public transport users;
- Carefully integrate parking to produce a liveable environment; and
- Consider the needs of disabled people and make appropriate provision for their transport needs.

In addition, Retained Policy DM23 would support the implementation of this policy. Appropriate and proportionate mitigations related to the size, density and transport network impact of proposals will be sought through Retained Policy DM23 to improve sustainable transport options.

Reasonable Alternative	Yes
Rationale	This option is integral to the sustainable delivery of Bristol’s Development Strategy (including housing and employment growth). It would form part of the hierarchy of policies required to ensure that new intensive forms of development delivered through the Urban Living approach are well-connected by sustainable transport. This option would be compliant with national policy requirements set out within

¹⁰⁶ <https://www.legislation.gov.uk/uksi/2019/907/made>

	the NPPF to address potential environmental impacts of development on transport networks and infrastructure; ensure transport considerations contribute towards high-quality places (para 102); and to minimise the number and length of journeys required for employment, education, retail and other uses (para 104 (a)).
Recommendations for Evidence Update	<ul style="list-style-type: none"> • Evidence base supporting existing AQMAs. • Development of local streetscape design planning guidance (e.g. as prepared by TfL)¹⁰⁷.

Draft Policy T2: Transport schemes

Option 1 No new policy in relation to transport schemes in the Local Plan

As the evidence baseline and strategic planning context has updated since the adopted Local Plan, including the recently adopted JLTP4, it is not considered to be a reasonable alternative to introduce no new policy related to new transport schemes. Major transport programme delivery at a local level is required to reflect updated strategic transport planning context set out in the JLTP4 and regional supporting strategies, including the Local Cycling & Walking Infrastructure Plan 2020.

Option 2 Introduce new draft policy in relation to transport schemes in the Local Plan

This option ('March 2019 Consultation Option') would introduce policy in respect of transport schemes to supersede existing policies on the basis that listed transport schemes and initiatives have since been developed or are evidenced as no longer required.

While the draft policy currently exists in the form of a placeholder, the intentions of this policy are to identify and protect routes which would be critical in developing infrastructure, including transport schemes identified in the current Local Plan, as well as new proposals contained within the JLTP4 transport programme. It would also safeguard railway sites and associated land required for rail infrastructure improvements. Existing transport facilities such as transport depots will also be safeguarded, where required.

This option would include schemes that support the strategic pattern of development set within the Local Plan Development Strategy and outline the key transport infrastructure required to promote sustainable transport within the Plan period. It is expected that this would be updated.

Reasonable Alternative	Yes
Rationale	<p>The need for this option is derived from the updated strategic Joint Local Transport Plan (JLTP4), which sets out new transport programme proposals for the West of England region, including to enable improved transport connectivity with Bristol Port, Bristol Temple Meads, M32 Park and Ride, MetroWest, and a mass rapid transit system to be complemented by MetroBus.</p> <p>As with Draft Policy T1, this option is integral to the sustainable delivery of Bristol's Development Strategy (including housing and employment growth) set out within the Local Plan. By identifying and safeguarding routes for future transport development based on the latest available evidence, this option would facilitate delivery of sustainable transport across the Plan area, and accord with national policy and guidance set within the PPG¹⁰⁸.</p> <p>This option would align with national policy set by the NPPF, specifically in its requirement to identify and protect, using robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise</p>

¹⁰⁷ <http://content.tfl.gov.uk/streetscape-guidance-.pdf>

¹⁰⁸ PPG Paragraph: 002 Reference ID: 54-002-20141010 and Paragraph: 003 Reference ID: 54-003-20141010.

	opportunities for large scale development (104 (c) and (e)); and to cooperate with local highway authorities and neighbouring councils to ensure strategies and investments for supporting sustainable transport and development patterns are aligned (para 104 (b)). In accordance with NPPF (para 104 (d)) and accounting for the recently adopted regional Local Cycling & Walking Infrastructure Plan 2020, this option would ensure the Local Plan provides for high-quality networks for these transport types.
Recommendations for Evidence Update	Evidence base in relation to local transport infrastructure improvements to be delivered within the Local Plan period, including demonstrating that there is a reasonable prospect that these proposals will come forward ¹⁰⁹ .

Draft Policy T3: Car and cycle parking provision for residential development

Option 1 No new policy in relation to car and cycle parking provision for residential development

Given the Local Plan objectives to address housing delivered through Urban Living principles and its focus on brownfield intensification, it considered that there is a requirement to introduce new policy within the Local Plan that would require an appropriate level of parking, whilst ensuring an efficient use of and optimal density applied to new development. A no policy option is not considered a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to car and cycle parking provision for residential development

This option would introduce new policy (the ‘March 2019 Consultation Option’) to determining the appropriate level, design and management of parking provision for new developments. It would operate within the framework of maximum car parking standards set by the BCC Parking Standards Schedule, which would continue to be supported by Retained Policy DM23.

The policy includes the requirement for new residential development to provide an appropriate level of safe, secure, accessible and useable parking that makes effective and efficient use of land. It sets out that the amount, design and proposed management of car parking provision should be based upon:

- The BCC Parking Standards Schedule;
- Site accessibility by walking, cycling and public transport to employment opportunities, services and other facilities;
- Local car ownership levels;
- Housing type and mix;
- Type of parking proposed and associated management arrangements, having regard to the characteristics of the surrounding area;
- Availability and potential for car clubs in the locality; and
- On-street parking availability in the vicinity of the site, accounting for existing parking management schemes in the area.

With the BCC Parking Standards Schedule setting out the maximum thresholds for residential development, this policy option would accommodate flexibility on a site-by-site basis, where lower parking provision will be encouraged in accessible locations provided it is otherwise consistent with the maintenance of safe road conditions.

¹⁰⁹ PPG Paragraph: 059 Reference ID: 61-059-20190315

In addition, the policy states that cycle parking provision is a priority form of transport infrastructure, and that provision will be expected in accordance with the standards in the Parking Standards Schedule.

Reasonable Alternative	Yes
Rationale	<p>This option sets additional car and cycle parking criteria to which new development would be expected to adhere to, to align with national guidance for promoting sustainable transport and achieving well-designed places, as set out within the NPPF (paras 102-107; 124-127). By maintaining reference to the adopted Parking Standards Schedule, this option would also accord with the provisions of the NPPF set out in para 105-106.</p> <p>Through emphasising cycle parking provision as a priority, this option would also indirectly support the wider delivery of the recently adopted regional Local Cycling & Walking Infrastructure Plan (2020), and ensure the Local Plan supports local high-quality cycle networks through suitable infrastructure.</p>
Recommendations for Evidence Update	Any updated evidence / justification for the Parking Standards Schedule (based on para 106 of the NPPF).

Although the Retained Policy DM23 refers to Retained Policy BCAP29 Car and cycling parking, which requires a significantly lower level of car-parking within the Central Area, other policy alternatives could be to map maximum parking-standards across the city, to integrate ‘zero-parking zones’ or Resident Parking Zones, and/or include recommendations for a workplace car parking levy within the new policy, to reduce vehicle parking.

Case study references: The Cambridge Local Plan (2018)¹¹⁰ sets out within its car and cycle parking requirements (Appendix L) that more restrictive maximum parking thresholds are required for development proposed within controlled parking zones. New developments do not qualify for residents’ parking permits within an existing on-street parking scheme – i.e. they are ‘car capped’.

The Draft London Plan (2019)¹¹¹ sets out maximum residential parking standards based on location, where areas such as the Central Activities Zone and Inner London Opportunity Areas are required to be car free, with the exception of disabled persons parking; increasing maximum parking thresholds from central towards outer London are applied.

Draft Policy T4: Cycle parking provision for B1 office development

Option 1 No new policy in relation to cycle parking provision for B1 office development

With the significant uptake in the adoption of cycling as a favourable mode of transport for commuting within the city, supported by investment in cycling facilities, there is an evidenced need to accommodate existing and encourage further growth in this sustainable transport mode by uplifting existing provision within office development. New office developments will need to accommodate higher levels of accessible cycle parking to enable cycling to be convenient and inclusive for all employees. A no new policy option is therefore not considered a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to cycle parking provision for B1 office development

¹¹⁰ <https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf>

¹¹¹ https://www.london.gov.uk/sites/default/files/draft_london_plan_-_consolidated_changes_version_-_clean_july_2019.pdf

This option would introduce a new specific policy (the ‘March 2019 Consultation Option’) for the provision of cycle parking provision for new office development (former Use Class B1, now Use Class E(g)). It would set minimum standards for the provision of secure cycle parking and associated cycle facilities for staff and visitors, as follows:

- For staff, one space per 50m² of gross floor area;
- For visitors, one space per 1000m m²;
- 1 shower per 1,000m² gross floor area; and
- 1 locker per cycle space.

The proposed new cycle parking standard reflects local evidence that office environments are becoming more densely occupied, with one member of staff per 14m² now common; and the level of provision reflects increasing occupancy levels of offices and the demand for space arising from commuting by bicycle.

Reasonable Alternative	Yes
Rationale	The proposed new cycle parking standard reflects the latest available evidence in relation to office occupation density and the demand for space arising from commuting by bicycle in the city. As with Draft Policy T3, this option would also indirectly support the wider delivery of the recently adopted regional Local Cycling & Walking Infrastructure Plan (2020), and ensure the Local Plan supports local high-quality cycle networks through suitable infrastructure.
Recommendations for Evidence Update	<ul style="list-style-type: none"> • Any updated evidence / justification for the Parking Standards Schedule (based on para 106 of the NPPF). • New evidence in relation to short-medium changes to work patterns / office space occupancy following COVID-19.

Other alternatives could consider adjusted thresholds for the provision of cycle parking within office development. Evidence will be needed to justify these thresholds before testing of reasonable alternatives is undertaken.

Case study reference: The Cambridge Local Plan (2018)¹¹² requires office use development to provide 2 spaces for every 5 members of staff or 1 space per 30 sqm gross floor area (GFA). General industry development is required to provide 1 space per 3 members of staff. Visitor parking is required on merit for both development types.

Draft Policy T5: Provision of infrastructure for electric and other low emission vehicles

Option 1 No new policy in relation to the provision of infrastructure for electric and other low emission vehicles

Given the national objectives to ensure at least 50% of new cars are ultra-low emission by 2030 supported by recent declaration by UK Government that the sale of new combustion-engine vehicles will be banned by 2030 ; alongside local commitments by BCC to reach net zero emissions by 2030, it considered that there is a requirement to introduce separate policy within the Local Plan that sets out clear requirements for electric and low-emission vehicle charging infrastructure. A no policy option is therefore not considered a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to the provision of infrastructure for electric and other low emission vehicles

¹¹² <https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf>

This option would introduce new policy to address the future provision of electric and other low emission vehicle infrastructure (the ‘March 2019 Consultation Option’). The policy would apply to all development proposals that include parking facilities; or which are likely to generate vehicle movements or vehicle ownership, where design and layouts of development will be required to integrate provision of infrastructure to enable charging of electric or ultra-low emission vehicles.

New policy sets out requirements for proposals to include ‘active’ EV charging infrastructure, which is installed immediately, and ‘passive’ infrastructure, which requires physical conduits to support future charging points, and the reservation of electrical capacity.

A tiered approach to provision is provided for individual, major and super-major residential development, with requirements set out accordingly:

- *Individual dwellings* - all individual dwellings with one or more dedicated parking spaces will be expected to include infrastructure suitable for charging electric or other ultra-low vehicles;
- *Major developments* (10 dwellings or more) - at least 20% of dwellings will be expected to have active charging facilities, and the remaining 80% of dwellings will be expected to have passive provision; and
- *Super-major developments* (100 dwellings or more) – in addition to requirements for individual and major developments, super-major developments will be required to provide at least one rapid charging point clustered with a fast charging point for every 10 car spaces provided.

Under this policy, residential development with communal off-street parking provision will be required to provide a minimum of 20% of car spaces with active charging facilities, with passive provision for the remaining spaces. Layouts of car parks will be required to ensure that all spaces can be ‘activated’ to match future demand for EVs.

In scenarios where off-street parking is not provided within proposals, development will be required to incorporate enabling infrastructure for the safe on-street charging of electric or other ultra-low emission vehicles.

For non-residential development, the following development requirements are set out:

- All non-residential development with 1 or more car parking spaces should install ducting to enable provision of charging facilities for electric or other ultra-low vehicles;
- For proposals that include 10 or more car parking bays, a minimum of 20% of car parking bays should provide active charging facilities for electric or other ultra-low vehicles, and passive provision is required for all remaining bays; and
- Major non-residential development that includes provision for taxi waiting should include active charging facilities for taxi spaces.

Reasonable Alternative	Yes
Rationale	The market share of EVs is projected to increase as set out in national Road to Zero Strategy’ (2018). Projections by National Grid suggest that the UK stock of EVs could reach between 2.7 and 10.6 million by 2030 and could rise as high as 36 million by 2040 ¹¹³ . With electric vehicle ownership growing and forecasters predicting exponential growth over the next two decades as combustion engine mass transit vehicles are replaced, it will be increasingly important to provide viable solutions including recharging infrastructure to remove the current sense of ‘range anxiety’.

¹¹³ National Grid (2018). Future Energy Scenarios.

	<p>This option would respond to regional investment that aims to accelerate the purchase of EVs across Bristol, South Gloucestershire, North Somerset and Bath & North East Somerset¹¹⁴. It would ensure that active and passive provision for EVs would be provided across all types of development. This option would therefore accord with the specific provisions of the NPPF, as set out in para 105 (e), which require both residential and non-residential development to include EV and ultra-low emission vehicle recharging infrastructure. The introduction of this option would therefore enable increased choice in terms of the ownership and usage of EVs; and would also support air quality improvements promoted via the new Clean Air Zone, likely to be a core component of the incoming Bristol Air Quality Plan.</p>
<p>Recommendations for Evidence Update</p>	<p>Development of a local Ultra-low Emission Vehicle Strategy, or equivalent Supplementary Planning Guidance for the design of EV and ultra-low emission vehicle infrastructure.</p>

Other alternatives could consider adjusted thresholds for the provision of active charging infrastructure within major and super-major residential and non-residential forms of development. In addition, alternatives could set parameters / targets for non-residential uses e.g. employment and retail sites. Evidence will be needed to justify these thresholds before testing of reasonable alternatives is undertaken.

Case study reference: The Draft London Plan (2019)¹¹⁵ Policy T6.1 Residential Parking is in line with BCC's Draft Policy T5. Under Policy T6.3 and T7, retail development and particular logistics / industrial locations should include rapid electric vehicle charging provision to support carbon-free transport. Outside of the Central Activities Zone (CAZ), and to cater for infrequent trips, car club spaces may be considered appropriate in lieu of private parking. Any car club spaces are required to have active charging facilities.

Policy requirements could consider introducing requirements linked to amenity and public realm design, for instance, as adopted by the Draft London Plan, where physical infrastructure should not negatively affect pedestrian amenity and must remain accessible to all, including disabled people (para 10.6.8)¹¹⁶.

Stage 3: Assessment and Evaluation of Alternatives

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

- A West of England Joint Transport Study (JTS) was undertaken in 2017 to address both current transport challenges, including carbon reduction, the need to respond to climate emergencies and forecast growth faced by the region. It is acknowledged that the regional transport evidence baseline may have changed, in light of the Covid-19 pandemic, and therefore it is anticipated that this will require update in the next SA.
- The JTS identified future strategic transport proposals for delivery up to 2036 that address current challenges and inform future development proposals for local and regional plans. This will require update in light of the emerging Spatial Development Strategy, and future reasonable alternatives will need to be considered.

¹¹⁴ 'Go Ultra Low West' is a £7m project that aims to accelerate the purchase of electric vehicles across Bristol, South Gloucestershire, North Somerset and Bath & North East Somerset.

¹¹⁵ <https://travelwest.info/drive/electric-vehicles/go-ultra-low-west>
¹¹⁵ https://www.london.gov.uk/sites/default/files/draft_london_plan_-_consolidated_changes_version_-_clean_july_2019.pdf

¹¹⁶ https://www.london.gov.uk/sites/default/files/draft_london_plan_-_consolidated_changes_version_-_clean_july_2019.pdf

- A Bristol Air Quality Action Plan (AQAP) is currently in preparation, which will provide the mechanism by which BCC state their intentions for working towards the air quality objectives. As such, identification of alternatives in relation to Policy T1 and T2 will be required to account for any relevant measures to address poor air quality through the Local Plan.
- The national Transport Decarbonisation Plan (TDP) is currently emerging and due for publication in Spring 2021. While current challenges and next steps for the development of the plan are identified, it is acknowledged that there remains a gap in the detailed actions required to be taken by individual sectors to meet the zero emissions pathway.
- Uptake of different modes of transport (cycling, electric vehicles etc), is also in part dependent upon a range of fiscal incentives, such as the national Workplace Charging Scheme and the Electric Vehicle Homecharge Scheme, alongside grid capability and market availability. Assessment of effects is therefore founded on the principles within the policy, with the scale of uptake often unknown.

Summary of assessment findings

Selected Approach for Draft Policy T1 – Option 2

This draft policy option aims to support the approach to Urban Living guided by the Local Plan Development Strategy, by requiring that development proposals minimise the need to travel by car and maximise opportunities for walking, cycling and the use of public transport. While Retained Policy DM23 would continue to guide transport development management, it is considered necessary to introduce extra provisions set by this policy, so that transport infrastructure is delivered both strategically and sustainably across the Plan area.

Selected Approach for Draft Policy T2 – To be confirmed

Assessment of this Draft Policy is pending, as at the March 2019 Consultation Draft stage potential transport proposals were subject to ongoing technical studies. The next iteration of the SA will include an appraisal of the revised Draft Policy and subsequently outline BCC's Selected Approach with regards to this policy.

Selected Approach for Draft Policy T3 – Option 2

This Policy Option would ensure continued compliance with the standards set out in the Parking Standards Schedule of the SADMP, while introducing specific criteria that are required to be accounted for by development proposals in their assessment of parking needs, including availability and potential for car clubs within the locality.

By requiring proposals to consider on-street provision, accessibility and local car ownership, this draft policy option could support lower levels of parking within areas deemed most sustainable in terms of accessibility; as well as bringing potential positive effects for the wider public realm. This draft policy option is considered to provide support sustainable transport management, whilst enabling implementation of the Urban Living principles.

Selected Approach for Draft Policy T4 – Option 2

This Policy Option would involve introduction of higher minimum standards for the provision of cycle parking and associated amenity facilities within Use Class E (c) and (g) office development. Given the level of current and projected demand for cycling as a mode for commuting, alongside the level of investment into strategic cycle infrastructure driven in part by the recently adopted Local Cycling

and Walking Infrastructure Plan, it is considered necessary to uplift requirements for office development proposals.

Selected Approach for Draft Policy T5 – Option 2

This Policy Option would include new guidance in relation to the provision of electric (EV) and low emission vehicle (ULEV) charging infrastructure, setting out minimum requirements for both residential and non-residential development. Provision is expected for active and passive charging infrastructure, to enable futureproofing of development with regards to EVs and ULEV technology. Given the need for such infrastructure based on anticipated demand, there is a clear role for the Local Plan to encourage inclusion within all relevant development, and to ensure that this is best managed in terms of design and any required mitigation.

Grouped Policy Theme Recommendations

- At a Local Plan Objective level, it is recommended that the role of sustainable transport features more explicitly in the delivery of inclusive, connected employment and residential development; to shift towards a low carbon transport system and meet objectives of achieving net zero carbon emissions by 2030.
- The grouped policies should reference the West of England’s Joint Green Infrastructure Strategy¹¹⁷ to ensure coordinated delivery of green infrastructure as part of integrated transport schemes.
- Short-medium term implications of COVID-19 for travel and work patterns (e.g. lower rate of office occupancy and more flexible working hours) may need to be accounted for as businesses and services operate in a more flexible way going forward, both for well-being and public health reasons.
- Reflect on the National Transport Decarbonisation Plan and the Bristol Air Quality Plan when these are published in their final form, including the implications of key targets and/or objectives relevant for the development of Local Plan transport policy.

¹¹⁷ <https://www.westofengland-ca.gov.uk/wp-content/uploads/2020/07/Joint-Green-Infrastructure-Strategy-%E2%80%93-June-2020..pdf>

Draft Policy T1: Development and transport principles

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to development and transport principles						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
Short	Med	Long								
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	0/?	0/?	0/?	I	Both	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	CR: Urban Living policies – including density requirements.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7 DMC8	+/?	+/?	+/?	I	Both	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	As above.
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Bristol's local economy / local centres; AG: Local businesses.	n/a
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	n/a
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	++/?	++/?	++/?	I	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	CR: Requirement for mitigation under draft air quality policies. MB: Reference inclusive and accessible cycling for all users. MB: Reference use of design that would contribute to positive well-being – e.g. biophilic design.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	+/?	+/?	+/?	I	P	Local and City-wide.	R: Bristol's local economy; AG: Bristol's population; educational facilities.	MB: Reference required accessibility standards for disabled persons, by type of development.
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	I	P	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	As above.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local and City-wide.	As above.	As above.
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide.	R: Cultural heritage; built environment; AG: Bristol's population.	n/a
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	Both	Local and City-wide.	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	n/a
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	I	Both	Local and City-wide.	As above.	MB: Prioritise the hierarchy of the street and include specific requirements to design for walkable, cycle-friendly streets and public spaces – reference design guidance set out within the National Design Guide. It is also recommended that local streetscape design guidance be prepared to support delivery of inclusive, high-quality design that maximises benefits for GI and active travel. MB: This should reference the Joint Green Infrastructure Strategy (emerging), to ensure coordinated delivery.
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	++/?	++/?	++/?	D	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	AM/MB: See recommendations made for T3, T4 policies.
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Bristol's local and strategic highway network. AG: Bristol's population	AM: Avoidance of adverse impacts by new development on existing highway and local provision.
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	n/a	n/a	n/a	n/a	n/a	n/a	n/a	MB: Detailed design of proposals should follow best practice guidance with regards to SuDS to mitigate against surface water run-off.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	AM: Encourage use of recycled materials (e.g. asphalt, steel and plastic) wherever possible.
	17. Minimise air and noise pollution	DMC38	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Requirement for mitigation under draft air quality policies.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Reference inclusive, high-quality streetscape design that maximises benefits for GI and climate resilience.

Reasonable Alternative Evaluation of Effects and Rank	<p>Rank Score: 1 – This Policy Option would set out general transport development management principles for consideration in all new proposals for development, to be introduced alongside Retained Policy DM23. This policy aims to supplement the approach to Urban Living, by requiring that development minimises the need to travel by car and maximise opportunities for walking, cycling and the use of public transport. Developments should be designed and located to ensure the provision of safe streets for all users and reduce as far as possible the negative impacts of vehicles including sources of both air and noise pollution.</p> <p>Scale of effects: The scale of effects would be at the building and site level, however, would also have local and city-wide cumulative effects where the policy principles are implemented in new development across the city.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • By requiring high-density development proposals to be located where it is possible to achieve sustainable travel patterns, this policy option could provide minor positive effects for SA Objectives 2 and 3, with potential for synergistic effects where introduced in combination with the Urban Living policies themselves. While this option encourages development within sustainable locations, the extent to which this option would support the reuse and regeneration of brownfield land and enable access to key services will be subject to implementation; therefore, effects against these Objectives are partly unknown. • This option could trigger regeneration or investment in deprived areas; and could indirectly support the connectivity of population to employment and/or education opportunities, services and other community facilities. Effects of this policy option against SA Objective 5 are considered to be minor positive where development is proposed within areas of deprivation, however this is unknown at this stage and will be location specific. • By requiring development proposals to reduce the negative impacts of vehicles including excessive volumes, fumes and noise; and the creation of places and streets shaped by the needs of pedestrians, cyclists and public transport users, this policy option could create direct significant positive benefits for SA Objective 6 for DMC12 and for DMC14, whilst indirectly supporting healthier lifestyles and positive well-being (DMC13). However, as impacts on air quality and the degree to which walking and cycling are made attractive through development are dependent upon the scale, nature and siting of development, effects against this Objective are also partly unknown. • This policy option aims to ensure that development proposals are located where sustainable travel patterns can be achieved, with more intensive and mixed-use development in accessible locations along main public transport routes to meet Urban Living principles. This policy option could therefore bring potential benefits to enhancing sustainable accessibility to services and education; ensuring development is walkable and/or cyclable, ensuring more inclusive accessibility and lowering Scope 3 emissions to deliver ‘net zero’ development. However, as the policy is also reliant on urban living principles, effects against SA Objectives 7 and 9 are unknown overall. • By directing more intensive development (including mixed-use with employment) towards more sustainable locations as led by the Urban Living principles, it is likely under this draft policy option there may be a reduced need to travel for employment opportunities as these could be in closer proximity to existing and/or proposed residential development. This draft policy option could therefore bring potential minor positive effects for SA Objective 8, specifically under DMC17, DMC19 and DMC21. However, effects of this policy are uncertain and dependent upon multiple factors associated with policy implementation and location of employment sectors. • The effects of this option against SA Objectives 10 and 11 are considered to be unknown, as proposals for new development are likely to impact air quality, which may have minor negative effects for existing heritage assets and/or the natural environment, via structural corrosion, acidification or eutrophication. As retained policies are in place to minimise impacts on sensitive ecological or historical receptors (i.e. BCS22, DM31, BCS9 and DM19), effects are therefore dependent on design proposals, site-specific considerations and the degree of mitigation proposed. • As opportunities to maximise GI are not referenced within the design of streetscapes and liveable environments, effects are also unknown in terms of GI enhancement (SA Objective 12 DMC27). • Under SA Objective 13, effects are likely to be significant positive against DMC28 and DMC29, as the Option promotes improvement of access to and quality of sustainable transport modes (walking, cycling and public transport) and aims to support the delivery of new transport infrastructure for development. Positive effects are likely to be maximised when introduced with evidenced and sustainable transport schemes, to be set out in updated Draft Policy T2. • While the effects of this option for SA Objective 14 are likely to be direct in terms of impact on the local highways network and associated levels of traffic, effects are unknown at this stage as they are highly linked to: the type of development and its final design; the density of development and its proposed parking strategy; and schemes set out within T2. • It is considered that there are opportunities to maximise positive effects against SA Objectives 16 and 18, including through employing circular economy principles within construction materials or GI enhancements within design of development proposals. However, as the policy is neutral with regards to the type and scale of development, these opportunities will likely be implemented to different degrees. Given that the effects remain reliant on constructed design, effects against these Objectives are therefore dependent on design proposals, site-specific considerations and the degree of mitigation proposed. • This option could generate minor negative indirect effects for air quality (SA Objective 17) through construction and operation stages, dependent upon the scale of development proposed and its siting. However, by including the requirement for proposals to reduce as far as possible the negative impacts of vehicles including emissions, this option has the potential to secure appropriate mitigation for development proposals where additional trip generation is likely to be a secondary impact. Overall effects are unknown and dependent upon the level of accessibility by active travel (i.e. walking and cycling) and public transport options, alongside other design and site considerations.
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Draft Policy T2: Transport schemes – policy not appraised due to its preliminary stage

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 Introduce new draft policy in relation to transport schemes in the Local Plan					Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/- / ?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	
			Short	Medium	Long			
			Assessment of this Draft Policy is pending, as at the March 2019 Consultation Draft stage potential transport proposals were subject to ongoing technical studies. The next iteration of the SA will include an appraisal of the revised Draft Policy and subsequently outline BCC's Selected Approach with regards to this policy.					
Evaluation of Effects	<p>Rank Score: Unknown, as at the March 2019 Consultation Draft stage, potential transport proposals were subject to ongoing technical studies. The Local Plan will eventually include a policy that identifies and protects critical sites and routes for evidence-led transport schemes, including rail infrastructure improvements. Schemes will include those within the current plan alongside relevant new proposals within the JLTP4.</p> <p>Scale of effects: Given that this policy would introduce an updated list of transport schemes / infrastructure for delivery within the Plan area, the scale of effects would be varied, and for major schemes, likely be at all spatial levels – from local through to transboundary.</p> <p>Social, economic and environmental effects: Unknown, on the basis that the policy is at a preliminary development stage. Further testing would be required when the evidence-led schemes are set out within this policy.</p> <p>Suggestions / Recommendations: While the draft policy is yet to be developed in its final form, broad suggestions and recommendations can be made that are relevant to the overarching purpose of this policy to deliver transport schemes; as set out thematically below.</p> <p><u>Public transport development</u></p> <ul style="list-style-type: none"> Public transport vehicles / new transport modes should be of high modern standards to utilise alternative and sustainable fuels (e.g. electric) where possible and minimise emissions. Integrate upgraded or new mass transport infrastructure with 'last mile' innovations and active travel options e.g. underground Eco Cycle storage where high volume parking is required in high density, land scarce locations such as train stations or commuter hubs. <p><u>General design principles (applicable to all development schemes)</u></p> <ul style="list-style-type: none"> Schemes should make best use of existing infrastructure to minimise resource consumption and waste generation, prior to the construction of new facilities. Principles of the 'circular economy' in development of associated infrastructure/buildings should be adopted, linking to draft Climate Change and Sustainability policies. Ensure scheme design incorporates sustainable use of materials as well as measures to minimise future maintenance requirements, to increase low impact performance of schemes. Detailed design of proposals should follow best practice guidance with regards to SuDS to mitigate against surface water run-off. Strategic and major transport infrastructure schemes should be designed to take into account the effects of climate change in line with national policy and best practice design. Use of innovative technologies e.g. 'energy harvesting' from asphalt pavement using thermoelectric technology should be encouraged. Include appropriate reference to the final CAZ, due to be implemented in 2021 – where transport schemes should ensure 'smart integration' with this zone e.g. 'drop off' zones/park and ride facilities. Account for the future GI Plan – currently under preparation at a combined authority level – when designing schemes, as recommended by the JLTP4 SEA. <p><u>Environmental appraisal and mitigation</u></p> <ul style="list-style-type: none"> Set out within policy that major development proposals that meet certain criteria will be subject to EIA and relevant environmental legislation. Detailed mitigation and enhancement opportunities will be developed as part of the design and consenting process at the scheme level. Ensure cross-links to air quality policy principles (proposed under Draft Policy HW2) when setting out required mitigation for schemes. Recommend that major schemes have a Construction Environmental Management Plan. This would include mitigation and monitoring measures to avoid and minimise the degradation of soil and water resources amongst other considerations. <p><u>Highways development</u></p> <ul style="list-style-type: none"> Ensure future development is appropriately considered and designed to respond to local context. Good design (e.g. Highways England – the road to good design (2018)) and cultural heritage assessment should be required for all major schemes to minimise potential adverse impacts / maximise opportunities for benefits. Development of new road links, where based on JLTP4 and local evidence base, should ensure that no adverse impacts are created for vulnerable receptors / land uses, in terms of landscape/visual and air quality impacts. 							

Draft Policy T3: Car and cycle parking provision for residential development

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to car and cycle parking provision for residential development			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/- / ?)							
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	?	?	?	I	Both	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Include requirement for space-efficient design e.g. double-stack parking to ensure high accommodation and reduced footprint. AM: The provision of car parking should not be a reason for reducing the level of affordable housing in a proposed development.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	+/?	+/?	+/?	I	Both	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	MB: As above.
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	?	?	?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	CR: Retained and draft policies relating to high-quality urban design.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	I	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	MB: Reference use of design that would contribute to positive well-being – e.g. biophilic design. MB: Financial contribution towards local car clubs / pooled cycles, with mechanisms in place to ensure that these are inclusive and affordable for all users.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Economy and Employment	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	n/a	n/a	n/a	n/a	n/a	n/a	n/a	CR: Reference to retained / draft policies linked to historic environment conservation.
Townscape and Landscape	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	n/a	n/a	n/a	n/a	n/a	n/a	n/a	AM/MB: Use of natural and green surfacing / planting (e.g. turf grids or green roof cycle shelters) that to help reintroduce biodiversity and offset CO2 emissions. Ensure that this complements the local ecological network. AM/MB: As above.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Transport and Movement	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	?	?	?	D	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	MB: Ensure inclusive cycle parking provision for impaired mobility and other users, such as children and elderly people (inclusive cycles, cargo cycles and tricycles, accessed via a step-free route). MB: Require cycle parking design to maximise safety, security, and weather-proofing to ensure uptake. MB: Provision for e-bikes charging, powered by renewable energy. MB: Include opportunities for residential cycle clubs / shared cycles.
	14. To maintain and improve the existing highway network	DMC30 DMC31	?	?	?	I	Both	Local and City-wide.	R: Bristol's local and strategic highway network. AG: Bristol's population.	AM: Avoidance of adverse impacts by new development on existing highway and local provision. AM: Car parking elements of policy need to be linked to proposed electric vehicle requirements (Draft Policy T5) and to air quality principles (Draft Policy HW2). MB: Consider requirement for associated management arrangements for cycle parking and any affiliated car or cycle pooling proposed within new development (as part of a Travel Plan).
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	n/a	n/a	n/a	n/a	n/a	n/a	n/a	AM: Use of SuDS to minimise / avoid surface water run-off at larger car parking sites. AM: For secure cycle shelters and compounds, drainage, and maintenance considerations. AM: Use of porous surfacing materials, rainwater recovery and recycling via natural ground surfaces.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	As above, plus: AM: Encourage use of recycled materials for both forms of parking, wherever possible. AM: Consider additional measures (such as petrol interceptors) in areas of poor water quality.
	17. Minimise air and noise pollution	DMC38	-/?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	AM: Major development proposals should incorporate financial contribution towards local car clubs / pooled cycles. CR: Draft policy in relation to EV provision.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	AM: Increase use of green spaces, energy efficient lighting design in underground parking, use of renewable power for charging or consider use of innovative technologies e.g. 'energy harvesting' from asphalt pavement using thermoelectric technology.

Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would set out requirements in relation to car and cycle parking provision specific to new residential development. Alongside a requirement to accord with the maximum standards within the local Parking Standards Schedule, this option would require proposals to consider criteria including accessibility, local car ownership, housing mix and type, on-street parking and availability of and potential for car clubs in the locality, amongst other criteria.</p> <p>Scale of effects: The scale of effects would be at the site level, however, would also have local and city-wide cumulative effects where new residential development is constructed across the city.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • The effects of this policy option against SA Objective 1 are considered to be unknown overall. The requirement for appropriate levels of car parking may affect development capacity due to a reduction in available floorspace for additional residential units, including affordable housing. However, this is dependent upon the development proposed, alongside surrounding context in terms of parking provision and availability of car clubs. By requiring accessible parking for development, this would support delivery of inclusive residential development. It is unclear the extent to which the policy would enable parking provision for new development that would also prevent harm to existing communities, both in terms of visual effects and local parking impacts. • By requiring development proposals to make effective and efficient use of land within the design of car and cycle parking, this policy option could create minor positive effects for SA Objective 2. However, as this policy is in effect the implementation of other relevant policies including Urban Living and the Development Strategy itself, the scope for positive effects under this policy alone is limited. • Depending on site-specific considerations, such as the siting of car-parking, this policy option could create either minor positive or negative direct effects for the built environment. It is not likely that this policy itself would trigger significant regeneration or investment in derived areas. Therefore, where development is proposed within areas of deprivation, effects of this policy option against SA Objective 5 are considered unknown. • Against SA Objective 6, this policy option could create both minor positive and negative effects for public health, however, would not specifically address health inequalities across the city. The degree to which this option would contribute to air quality and healthy lifestyles is linked to the quantum of car parking delivered relative to cycle parking; the availability of sustainable public transport; the distance of development from employment opportunities, amongst other considerations such as the air quality baseline (including whether development is sited within or proximate to AQMAs). There is potential for a lower rate of emissions where EV infrastructure is installed, though the affordability of such technology may preclude some users, particularly in deprived areas. • The effects of this option against SA Objectives 10, 11 and 12 are considered to be unknown and guided through other development policies (i.e. BCS22, DM31, BCS9 and DM19). Proposals for new development may have effects on the historic and/or natural environment if these do not sympathetically respond to either the historic and/or landscape character or setting; or, account for biological or geological value. In addition, as opportunities to maximise GI are not referenced within the design of car and cycle provision, effects are also unknown in terms of GI enhancement. • While the effects of this option for SA Objectives 13 and 14 are likely to be direct in terms of impact on local highways and associated levels of traffic, they are also unknown at this stage, as the amount, design and proposed management of proposed car parking provision will influence the degree of effects. While there is potential for negative effects of this option against this Objective, this potential is also contingent upon the siting of development including current levels of congestion, alongside factors addressed within the policy such as availability and management of on-street parking and accessibility by active travel modes. • Effects of this option for SA Objective 15 are unknown as they remain dependent on the level of flood risk experienced at the site and surrounds, and will be guided by retained policies BCS16 and BCAP5. SuDs solutions, such as permeable car-parking surfaces and petrol interceptors, can help mitigate surface water run-off from car-parking. • While the scale of development that this policy option relates to is relatively small, it is considered that there are opportunities to maximise positive effects against SA Objectives 16 and 18, where SuDS and circular economy principles are employed within design, including use of sustainable or recycled materials and renewable energy regeneration. Given that the effects remain reliant on constructed design, effects are unknown. • This option could generate minor negative indirect effects for air quality (SA Objective 17) through construction and operation stages, dependent upon the scale of development proposed (including quantum of car parking) and the siting of development. Overall effects are unknown and dependent upon the level of accessibility by active travel (i.e. walking and cycling) and public transport options, alongside other design considerations and market forces outside of the policy's remit (such as EV uptake). Given the projected rollout of EVs, effects are classified as unknown in the medium to long term, reflecting the likely mixed picture in EV and ultra-low emission consumption, including Connected and Autonomous Vehicles (CAVs).
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Draft Policy T4: Cycle parking provision for B1 office development

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to cycle parking provision for B1 office development					Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/-/?)									
			Short	Med	Long							
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	MB: Include requirement for space-efficient design e.g. double-stack parking to ensure high accommodation and reduced footprint.
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	0/?	0/?	0/?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	n/a	n/a	
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	+/?	+/?	+/?	D	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	MB: Reference use of design that would contribute to positive well-being – e.g. biophilic design.		
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	0/?	0/?	0/?	I	P	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	n/a		
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	CR: Reference to retained / draft policies linked to historic environment conservation.	
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	AM/MB: Use of natural and green surfacing / planting (e.g. turf grids or green roof cycle shelters) that to help reintroduce biodiversity and offset CO2 emissions.	
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	AM/MB: As above.	
Transport and Movement	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	++/?	++/?	++/?	D	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	MB: Ensure inclusive cycle parking provision for impaired mobility and other users, such as children and elderly people (inclusive cycles, cargo cycles and tricycles, accessed via a step-free route). MB: Require cycle parking design to maximise safety, security, and weather-proofing to ensure uptake. MB: Provision for e-bikes charging, powered by renewable energy. MB: Include opportunities for residential cycle clubs / shared cycles. MB: Consider allowance for allowance for spare capacity (the London Cycling Design Standards ¹¹⁸ suggest 20% additional capacity).		
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Bristol's local and strategic highway network. AG: Bristol's population.	n/a		
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	AM: For secure cycle shelters and compounds, drainage and maintenance considerations. AM: Use of porous surfacing materials. Rainwater recovery and recycling via natural ground surfaces.	
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	+/?	+/?	+/?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	As above, plus: AM: Encourage use of recycled materials (e.g. asphalt, steel and plastic) for both forms of parking, wherever possible.		
	17. Minimise air and noise pollution	DMC38	+/?	+/?	+/?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	AM: Major development proposals should incorporate financial contribution towards local car clubs / pooled cycles. CR: Draft policy in relation to EV provision.		
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+/?	+/?	+/?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	AM: Increase use of green spaces, energy efficient lighting design in underground parking, use of renewable power for charging or consider use of innovative technologies e.g. 'energy harvesting' from asphalt pavement using thermoelectric technology.		

¹¹⁸ <http://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf>

Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would set out specific minimum requirements for office development to provide cycle parking provision and associated cycle facilities for amenity (changing, shower, storage and drying facilities). It would apply to office development that meets the B1 Use Class(now Use Class E) in excess of 200m² in gross floor area.</p> <p>Scale of effects: Effects would be attributed to the building and site level for B1 office development of 200m² or more. However, this policy option would also have local and city-wide cumulative effects where implemented in new and expanded office premises across the city.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This policy option could indirectly support improved quality of life for areas of deprivation where cycle provision may enable more affordable commuting to employment opportunities. However, given the reliance of this effect on a number of site-specific and social factors (including public health and education), effects of this option against SA Objective 5 are unknown overall. • Against SA Objectives 6 and 13, this policy option could create minor and significant positive effects for public health and sustainable transport (including improving access to and quality of sustainable transport modes) (DMC28), however, would not specifically address health inequalities across the city. By requiring that development proposals include minimum cycle parking provision and associated facilities, this option would likely make cycling a more attractive commuting option and therefore contribute towards attainment of healthy lifestyles and boost positive wellbeing (DMC13, DMC14). This option could also enhance local air quality where bicycles are favoured over private car or vehicles using traditional fuel types (DMC12). However, the degree to which this option would contribute to air quality and healthy lifestyles is linked to the quantum of cycle parking delivered; the distance of development from residential locations and/or key public transport nodes, amongst other considerations such as the air quality baseline (including whether development is sited within or proximate to AQMAs) and the quality of supporting cycle networks; therefore, effects are also partly unknown. • The effects of this policy option against SA Objective 8 are considered to be unknown overall. The requirement for appropriate levels of cycle parking, particularly when introduced in combination with car parking for offices as set out within the Parking Standards Schedule, may affect site-specific development capacity due to a reduction in available floorspace. In addition, the requirement of this policy to include high-quality provision and associated facilities, could subsequently contribute towards workplaces that are zero carbon in their Scope 3 emissions through greater uptake of cycling. As the policy is neutral with regards to employment type, sector and location, effects are limited against this Objective. • The effects of this option against SA Objectives 10, 11 and 12 are considered to be unknown and guided through other development policies (i.e. BCS22, DM31, BCS9 and DM19). Proposals for new development may have effects on the historic and/or natural environment if these do not sympathetically respond to either the historic and/or landscape character or setting; or, conserve biological or geological value. In addition, as opportunities to maximise GI are not referenced within the design of car and cycle provision, effects are also unknown in terms of GI enhancement. • Effects of this option for SA Objective 15 are unknown as they remain dependent on the level of flood risk, and will be guided by retained policies BCS16 and BCAP5. • Effects of this option for SA Objective 16 are considered to be minor positive, where the option could indirectly reduce the overall usage of non-renewable fuels within transport by encouraging uptake of cycling for commuting purposes. However, the degree of positive effects would be dependent upon implementation and uptake (including strategic cycling infrastructure); and future work patterns amongst other considerations, and therefore is partly unknown in effect. • While the scale of development that this policy option relates to is relatively small, it is considered that there are opportunities to maximise positive effects against SA Objectives 16 and 18, where SuDS and circular economy principles are employed within design, including use of sustainable or recycled materials and small-scale renewable energy regeneration. Given that the effects remain reliant on constructed design, effects against these Objectives are therefore dependent on design proposals, site-specific considerations and the degree of mitigation proposed. • This option could generate minor positive indirect effects for air quality (SA Objective 17) where the policy would support delivery of cycle parking infrastructure, including facilities; however, overall benefit for air quality is highly dependent upon the scale of development proposed (including quantum of cycle parking) and socio-economic factors, such as employee culture and financial incentives (such as the Cycle to Work scheme).
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Draft Policy T5: Provision of infrastructure for electric and other low emission vehicles

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to provision of infrastructure for electric and other low emission vehicles			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/-/?)	Short	Med					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	-/?	?	?	D	Both	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Include requirement for space-efficient design to ensure high accommodation and reduced footprint. AM: As required by the Planning Practice Guidance, prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies (such as this one) is not of a scale that will make the plan (and ambitions to exceed 33,500 homes) undeliverable.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	?	?	?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	MB: Encourage use of electric pool cars within development, including located in areas of deprivation – to improve access to EV infrastructure. AM: Ensure implementation of infrastructure is not at expense of walkable/cyclable environment.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	I	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	-/?	?	?	I	P	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.
9. Ensure access to a range of shopping facilities for all sections of society		DMC22 DMC23	0/?	0/?	0/?	I	Both	Local and City-wide.	As above.	n/a
Townscape and Landscape		10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Transport and Movement	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	?	?	?	D	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	AM: Ensure implementation of infrastructure is not at the expense of a walkable/cyclable environment. AM: Include charging infrastructure for electric bikes and scooters.
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Bristol's local and strategic highway network. AG: Bristol's population.	AM: Ensure proposals are supported by assessment of effects on local highway, with presumption against proposals that would cause adverse impact. MB: Account for proposed requirements within the national Electric Vehicle Charging in Residential and Non-Residential Buildings guidance (2019) ¹¹⁹ and update Draft Policy T5 to reflect any emerging Ultra-Low Emission Vehicle Strategy or associated evidence prepared by BCC.
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a – addressed by retained flood risk and water management policies; mitigation implemented at site level.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	+/?	+/?	+/?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	MB: Use of low carbon / zero carbon materials as part of the EV infrastructure.
	17. Minimise air and noise pollution	DMC38	?	+/?	+/?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	n/a
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Encourage use of renewable power for features e.g. lighting, security systems.

¹¹⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/818810/electric-vehicle-charging-in-residential-and-non-residential-buildings.pdf

Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would include new guidance in relation to the provision of electric (EV) and low emission vehicle (ULEV) charging infrastructure, setting out minimum requirements for both residential and non-residential development. Provision is expected for active and passive charging infrastructure, to enable futureproofing of development with regards to EVs and ULEV technology. This option would not apply to off-street EV charging infrastructure that meets the requirements for permitted development under the GPDO¹²⁰.</p> <p>Scale of effects: Effects would be attributed to the building and site level. However, this policy option would also have local and city-wide cumulative effects for where implemented in both residential and non-residential development across the city.</p> <p>Social, economic and environmental effects: The following represents an assessment of effects related to the discrete provision of physical infrastructure within residential and non-residential development:</p> <ul style="list-style-type: none"> • It is recognised that installing the required EV/ULEV charge points presents an upfront cost for development viability which could affect both capacity and viability, including delivery of affordable housing. Therefore, effects of this option against SA Objective 1 and 8 could be minor negative and unknown in effect, based on site constraints and installation costs. This situation may change with anticipated market penetration of EVs and longer term cost reduction. Against SA Objective 8, this option could support delivery of infrastructure that would support reduction in Scope 3 emissions linked to new or extended employment space. • Against SA Objective 6, this policy option could create both minor positive effects for public health in terms of air quality, however, would not specifically address health inequalities across the city. The degree to which this option would contribute to improved air quality is linked to the level of charging infrastructure and assumed EV ownership, amongst other considerations such as the existing air quality baseline. It is plausible that provision of EV infrastructure could decrease the attractiveness of active travel for short-range trips, particularly as public charging points become more prevalent and/or affordable, which may create negative effects for maintaining healthy lifestyles. It should also be noted that effects are linked to the affordability of such technology, which may preclude some users, particularly in deprived areas, and therefore potentially widen health inequalities. On the basis of the above, overall effects are considered to be unknown dependent on siting of development and EV ownership relative to traditional fuel vehicles. • The effects of this option against SA Objectives 10, 11 and 12 are considered to be unknown overall. Proposals for EV infrastructure could encourage uptake of this mode of transportation, which could improve the air quality baseline and have indirect benefits for the built and natural environment (i.e. reduced negative effects of greenhouse gas emissions through acidification or eutrophication of water bodies), however, this is also dependent upon other market factors determining a shift towards EVs amongst the city's population. • As set out under assessment of effects against SA Objective 6, this policy option may reduce active travel modes or use of sustainable public transport, where provision would support private vehicle ownership, to generate minor negative effects for SA Objective 13. While the effects of this option for SA Objectives 13 and 14 are likely to be direct in terms of impact on local highways and associated levels of traffic, they are also unknown at this stage, as the quantum, design and proposed management of proposed EV/ULEV infrastructure provision will influence the degree of effects, including the extent of modal shift towards low emission vehicles. • Effects of this option for SA Objective 15 are unknown as they remain dependent on the level of flood risk experienced at the site and surrounds and will be guided by retained policies BCS16 and BCAP5. • Effects of this option for SA Objective 16 are considered to be minor positive, where the option could reduce the overall usage of non-renewable fuels within transport by encouraging uptake of electric vehicles. However, the degree of positive effects would be dependent upon the source of electricity for charging points and other factors outside of the planning system (i.e. market conditions for the uptake of EVs/ULEVs), and therefore partly unknown in effect. • While the scale of development that this policy option relates to is relatively small, it is considered that there are opportunities to maximise positive effects against SA Objectives 16 and 18, where circular economy principles are employed within design, including use of sustainable or recycled materials and renewable energy regeneration. Given that the effects remain reliant on constructed design, effects against these Objectives are therefore dependent on design proposals, site-specific considerations and the degree of mitigation proposed. • This option could generate minor positive direct effects for air quality (SA Objective 17) through operation stages, dependent upon the scale of development proposed, which would influence minimum EV/ULEV infrastructure provided. Overall effects are unknown and dependent upon the level of accessibility by active travel (i.e. walking and cycling) and public transport options, alongside other design considerations and market forces outside of the policy's remit, as set out above. Given the projected rollout of EVs, effects are classified as unknown in the medium to long term, reflecting the likely mixed picture in EV and ultra-low emission consumption, including Connected and Autonomous Vehicles (CAVs).
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¹²⁰ Schedule 2, Part 2, Class E of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

Draft Policies CCS1 – CCS5: Assessing the Effects of Climate Change and Sustainability Policies

Climate Change and Sustainability

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

Addressing climate change is one of the core planning principles which the NPPF expects to underpin both plan-making and decision-taking¹²¹. As set out in PPG, responding to climate change is integral to the economic, social and environmental dimensions of sustainable development required by national policy¹²².

Local Plans are required to include policies which adopt proactive strategies to mitigate and adapt to climate change in line with the provisions of The Climate Change Act 2008, including the 2050 target amendment made in 2019¹²³. As part of the Local Plan development process, there is a legal obligation under the Strategic Environmental Assessment (SEA) regulations to assess planning policy's consistency with wider climate change objectives.

Based on the SA Scoping Report 2018 and Update Note 2020, key current sustainability issues are identified as:

- Bristol's current carbon emissions projection would not meet the city's net zero carbon target by 2030¹²⁴;
- A need to adapt to the effects of climate change, including flooding, more frequent severe weather events and urban heat island effects;
- A continued need to reduce the quantity of landfill waste;
- A need to improve the ratio of non-renewable to renewable energy use;
- High flood risk areas situated around existing watercourses, and areas at risk of surface water flooding, particularly in the city centre and at Avonmouth; and
- Management of increased pressure on water resources, particularly as a result of high population density.

In addition, since the adoption of the current Local Plan, the Paris Agreement (2016) was ratified at an international level, with the principle ambition to accelerate and intensify the actions needed for a sustainable low carbon future, including pursuing efforts to limit temperature increases to 1.5C above pre-industrial levels. Corresponding research by the IPCC published in 2018 highlights the need to strengthen efforts to emissions reduction to avoid a climate crisis.

Since the March 2019 Consultation Draft Local Plan:

- A report has been published to set out the Government's response to the Committee on Climate Change's 2019 Annual Progress Report to Parliament¹²⁵, following the amendment to the net zero targets within the Climate Change Act 2008. In order to meet the UK's carbon budgets

¹²¹ NPPF (2019). Paragraphs 8; 148-154.

¹²² Paragraph: 001 Reference ID: 6-001-20140306.

¹²³ The Climate Change Act 2008 (2050 Target Amendment) Order 2019.

<https://www.legislation.gov.uk/ukdsi/2019/9780111187654>

¹²⁴ Bristol One City Plan

¹²⁵ Leading on Clean Growth: The Government Response to the Committee on Climate Change's 2019 Progress Report to Parliament – Reducing UK emissions.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839555/CCS0819884374-001_Government_Response_to_the_CCC_Progress_Report_2019_Web_Accessible.pdf

(covering the periods 2023-2027 and 2028-2032) the report outlines need for transformational advancements in the pace of decarbonisation.

- As set out within the 'Leading on Growth' report¹²⁶, the UK government are consulting on a proposed trajectory of EPC Band B by 2030 for minimum energy efficiency standards in non-domestic rented buildings.
- The Energy White Paper 2020¹²⁷ sets out plans for scaling up use of low-carbon hydrogen production capacity; constructing 'greener' buildings with higher energy efficiency standards, amongst other ambitions.

At a local level, Bristol City Council have declared a Climate Emergency, as guided by the Mayor's Climate Emergency Action Plan (2019)¹²⁸. Bristol has also committed to becoming carbon neutral and climate resilient by 2030, with objectives to achieve this embedded in the One City Climate Strategy¹²⁹. The Local Plan Review therefore has an important role to support the policy response to climate change and ambitions to become zero carbon across the city's sectors, both through influencing the overall spatial planning strategy of the local authority area; and through setting appropriate policy implementation, including mitigation and adaptation for new development including within areas of climate sensitivity.

Policies under '*Climate Change*' of the Draft Local Plan are set out in Table 8. The grouped policies under this theme seek to directly meet the requirements of the following Local Plan aims to '*make sure new buildings protect the environment, working towards zero carbon development and adapting to the likely impact of climate change*' and '*tackle the challenges of air quality, obesity and environmental quality*'.

The Draft Local Plan makes it clear that the rationale for the introduction of new climate change policies are broadly as follows:

- To support aims for future development to be zero carbon; and
- Enable development of an urban environment that can adapt to the higher temperatures and more extreme weather events expected over the plan period and beyond.

In the Draft Local Plan, new policies proposed would replace existing climate change and sustainable construction policies (BCS13-15 of the Core Strategy) and provide additional policy provisions. These new policies would include requirements for:

- New development to achieve zero carbon through energy efficiency and reduction in regulated carbon emissions; carbon offsetting; and inclusion of sustainable heating and cooling systems;
- Development to include site and building-level measures to adapt to climate change, set out in an Adaptation Strategy;

¹²⁶ Leading on Clean Growth The Government Response to the Committee on Climate Change's 2019 Progress Report to Parliament – Reducing UK emissions
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839555/CCS0819884374-001_Government_Response_to_the_CCC_Progress_Report_2019_Web_Accessible.pdf

¹²⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945899/201216_BEIS_EWP_Command_Paper_Accessible.pdf

¹²⁸ <https://www.bristol.gov.uk/documents/20182/33379/Mayor%27s+Climate+Emergency+Action+Plan+2019+FINAL.pdf/db6a1919-ad51-c50e-3ca2-3b4561195476>

¹²⁹ <https://www.bristolonecity.com/wp-content/uploads/2020/02/one-city-climate-strategy.pdf>

- Considering resource efficiency and the impact of construction within the context of new development (a ‘circular economy’ approach); and
- Principles for the assessment of renewable energy development proposals.

The current situation is informed by proposals to retain Policies BCS16 and BCAP5, which establish the Local Plan’s approach in relation to flood risk and water management. The Climate Change and Sustainability Practice Note (2012) and Flood Risk Sequential Test Practice Note (2013) would continue to guide retained Policy BCS16 until they are updated to reflect new Local Plan policies and/or replaced with alternative guidance.

Table 8 Relationship with other relevant plans and programmes

Draft Policy	NPPF	Other legislation / Regulations	Retained Policies	Evidence
Chapter wide	-	The Paris Agreement 2016; The Climate Change Act 2008; The Climate Change Act 2008 (2050 Target Amendment) Order 2019.	-	IPCC Global Warming of 1.5C Report (2018).
Draft Policy CCS1: Climate change, sustainable design and construction	Paras 8; 148-150	Regulation 36 and Part G of Schedule 1 to the Building Regulations 2010. Approved Document G (Sanitation, hot water safety and water efficiency).	Retained Policy BCS16: Flood Risk and Water Management Retained Policy BCAP5: Development and Flood Risk	West of England Cost of Carbon Reductions study (CSE/Currie Brown) (2019).
Draft Policy CCS2: Towards zero carbon development	Paras 148 – 150; 153.	Planning and Energy Act 2008. Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations 2010.		Centre for Sustainable Energy Cost of Carbon reduction in new buildings (2018).
Draft Policy CCS3: Adaptation to a changing climate	Paras 8, 148; 155-165.	n/a – see Chapter-wide legislation.		An evidence-based strategy for delivering zero carbon heat in Bristol (2018).
Draft Policy CCS4: Resource efficient and low impact construction	Para 148			BCC Citywide Sustainable Energy Strategy (2009).
Draft Policy CCS5: Renewable energy development	Paras 151; 152; 154			West of England Sustainable Drainage Developer Guide (2015).

Stage 2: Identify and describe realistic alternatives

In light of the above discussion, alternatives considered for each of the draft policies under ‘Climate Change and Sustainability’ Policy Theme are set out below.

Draft Policy CCS1: Climate change, sustainable design and construction

Option 1 No new policy in relation to climate change or sustainable design and construction within the Local Plan

This option is a continuation of the current policy situation, which would result in a reliance upon the existing adopted Core Strategy / SADMP policy approaches only with respect to climate change, sustainable design and construction (detailed within Policies BCS13 and BCS15 of the Core Strategy).

Given the Code for Sustainable Homes was withdrawn in 2015 following adoption of the current Local Plan, the expectation for non-residential development is now to achieve a BREEAM “Excellent”

rating. With the introduction of new optional technical housing standards, there is a need to review and update the current policy approach and therefore, this option is not considered a reasonable alternative. This option is also not considered reasonable when evaluated against national and local net zero objectives, alongside the need to respond to climate change effects within the city.

Option 2 Introduce new policy in relation to climate change, sustainable design and construction within the Local Plan

This policy option (‘March 2019 Consultation Option’) would introduce requirements for development proposals to mitigate climate change and aim for zero carbon development (in line with the approach to Draft Policy CCS2). New requirements for development under this option are as follows:

- Aim to mitigate climate change, working towards net zero, and adapt to climate change;
- Accordance with sustainable design standards, where a BREEAM “Excellent” rating will be expected for major non-residential development (floorspace 1000m² and above); and a BREEAM Communities “Excellent” rating will be sought for residential or mixed-use development consisting of more than 200 residential units; and
- Achievement of a water efficiency standard of a maximum of 110 litres per person per day, as calculated using the Building Regulations methodology (against water performance targets under Regulation 36)¹³⁰.

Through requiring development to achieve water efficiency above the current requirement of 125 litres per person per day, this policy option would result in the Local Plan adhering to the ‘optional’ technical requirement for greater water efficiency under Requirement G2 of Regulation 36 to the Building Regulations 2010, as amended.

As set out in the updated PPG, local planning authorities are required to gather evidence to determine whether there is a need for additional standards in their area¹³¹; and justify setting appropriate policies in their Local Plans¹³². The Bristol Avon Catchment Plan (2016) identifies an issue of low river flows within the wider Bristol Avon Catchment, which is directly associated with abstraction levels for water supply. With a projected population increase particularly within the urban areas of Bristol, it is considered that introduction of higher efficiency standards is justified and would respond to the sustainability issues with regards to water quality.

Reasonable Alternative	Yes
Rationale	<p>This option would align with guidance in the NPPF in relation to transitioning towards low carbon development and addressing climate change (paras 148-50; 153). By requiring new development to meet specific sustainable design standards, this option would align with NPPF guidance (Para 150 (b)) in its approach, while setting additional local development management requirements for major development proposals.</p> <p>This option would also align with Government’s 25 Year Environment Plan and PPG</p>

¹³⁰ The Building Regulations 2010. Approved Document G (Sanitation, hot water safety and water efficiency) 2015 edition (with 2016 amendments). Appendix A – Water efficiency calculator for new dwellings. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/504207/BR_PDF_AD_G_2015_with_2016_amendments.pdf

¹³¹ Paragraph: 014 Reference ID: 56-014-20150327.

¹³² Paragraph: 002 Reference ID: 56-002-20160519

	<p>in relation to water efficiency and abstraction rates; and the need to account for the possible extent of climate change this century. It would also contribute towards achieving the objectives set out within the Mayor’s Climate Emergency Action Plan (2019)¹³³ and the One City Climate Strategy.</p>
<p>Recommendations for Evidence Update</p>	<ul style="list-style-type: none"> • Refresh evidence used to support retained policies in relation to water management (Policy BCS16), including an Updated Severn River Basin Management Plan (2015), Bristol Avon Catchment Plan (2016), and Bristol Strategic Flood Risk Assessment (SFRA). • Evidence for adopting the optional higher water efficiency requirement under Building Regulations – based on latest available data, consultation with statutory consultees including the EA, as required by PPG¹³⁴. • Local Plan viability assessment to include evaluation of the optional Building Regulation requirements.

Other alternatives could consider higher water efficiency targets (i.e. lower maximum thresholds for water usage per capita) under the optional technical requirements of the Building Regulations; and expanding the requirement for relevant sustainable design standards for all types of development (i.e. minor development and retrofitting measures). The latter option is based on comments provided at March 2019 Consultation on the Local Plan, which considered that to respond to the climate emergency, housing developments of all sizes should be required to meet a sustainable design standard. Evidence will be needed to justify these thresholds before testing of reasonable alternatives is undertaken.

Case study reference: The Broxtowe, Gedling and Nottingham City Aligned Core Strategy (2014)¹³⁵ requires developments to meet an optional Building Regulations requirement of 105 litres per person per day of water.

Draft Policy CCS2: Towards zero carbon development

Option 1 No new policy in relation to zero carbon development

Given the change to the current situation, including updated national policy guidance within this theme; the recent amendment to the Climate Change Act 2008 which includes a net zero emissions target for 2050; the likely introduction of the ‘Future Homes Standard’ by 2025; and recent net zero commitments by BCC as part of the One City Climate Strategy, an option based on the current policy situation is not considered a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to zero carbon development, to include carbon offsetting

This policy option (‘March 2019 Consultation Option’) would introduce requirements for achieving zero carbon in new development through heating, cooling, lighting and power in new and existing buildings. Within these requirements development would be expected to achieve the following through on-site and off-site measures:

- A minimum 10% reduction in regulated CO2 emissions through energy efficiency measures on-site;

¹³³ <https://www.bristol.gov.uk/documents/20182/33379/Mayor%27s+Climate+Emergency+Action+Plan+2019+FINAL.pdf/db6a1919-ad51-c50e-3ca2-3b4561195476>

¹³⁴ Paragraph: 015 Reference ID: 56-015-20150327

¹³⁵ <https://www.broxtowe.gov.uk/media/2160/broxtowe-aligned-core-strategy.pdf>

- A minimum 35% reduction in reduction in regulated CO2 emissions through a combination of energy efficiency measures and on-site renewable energy generation; and
- A total 100% reduction in remaining unregulated and regulated emissions through carbon offsetting (off-site).

In relation to energy performance standards, the Clean Growth Strategy (2017) published by Government in response to the Climate Act 2008, highlights the importance of high quality, energy efficient buildings and discusses the potential for raising minimum standards for energy efficiency. From 2019 all new public buildings in the UK are required to be 'nearly zero'¹³⁶¹³⁷ in accordance with Regulation 25B of the Building Regulations 2010.

In addition, the UK Government held a consultation in 2019 on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings (the 'Future Homes Standard'). This will require new build homes to be future-proofed with low carbon heating and high energy efficiency measures (75-80% lower carbon emissions than current Building Regulation requirements). As set out in the preliminary planning White Paper published by MHCLG ('Planning for the Future'), the Future Homes Standard is expected to be introduced by 2025. This policy option would therefore seek to respond to the introduction of this standard.

The Planning and Energy Act 2008 ('the Act') allows LPAs to set energy efficiency standards in their development plan policies that exceed the energy efficiency requirements of the Building Regulations. Provisions in the Act also allow development plan policies to set out reasonable requirements for a proportion of energy used in development in their area to be energy from renewable sources and/or to be low carbon energy from sources in the locality of the development.

These provisions are supported by updated PPG, which states that LPAs can:

- Set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that exceed the building regulations up to the equivalent of Level 4 of the Code for Sustainable Homes (approximately 20% above current Building Regulations across the build mix); and
- Are not limited in setting energy performance standards above the Building Regulations for non-housing developments.¹³⁸

In light of the above national guidance and legislation, it is reasonable to propose higher energy efficiency standards and development requirements than national Building Regulations, including for heating and cooling systems and on-site renewable energy within the Local Plan. By requiring development to meet ambitious carbon emissions targets through on-site and off-site measures, this option would contribute towards national legal targets within the Climate Change Act 2008 (2050 Target Amendment); and goals set within the BCC One City Climate Strategy, which include the aim for all buildings in the city to be carbon neutral and climate resilient by 2030; and delivering heat networks that will be zero carbon by 2050.

¹³⁶ A 'Nearly zero energy building' is defined within the Energy Performance of Buildings Directive (2010/31/EU).

¹³⁷ MHCLG (2019). Circular letter: nearly zero energy buildings requirements for new public buildings. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770809/nZEBS_circular_letter.pdf

¹³⁸ Paragraph: 012 Reference ID: 6-012-20190315

Reasonable Alternative	Yes
Rationale	<p>This option would address the key sustainability issue of improving the ratio of non-renewable to renewable energy use within Bristol; and contribute towards a reduction in the city’s carbon emissions as they relate to development.</p> <p>This option would align with guidance in the NPPF in relation to transitioning towards low carbon development and addressing climate change (paras 148-50; 153).</p> <p>It would also respond to the opportunity for LPAs to exceed energy efficiency standards within the Local Plan, as set out within the Planning and Energy Act 2008 and updated PPG; and would ensure the approach to development management policies reflect likely changes to Building Regulations in relation to energy efficiency and low carbon heating. In doing so, this option aligns with the 25-Year Environment Plan Objectives, which requires high environmental standards for all new builds, in ways that reduce demand for water, energy and material resources and minimises overheating.</p> <p>In relation to net zero development, this option accords with the Climate Change Act 2008 (2050 Target Amendment) Order 2019, which contains a legally binding commitment for the UK to achieve net zero by 2050. This option would also ensure that the Local Plan directly contributes to meeting Bristol’s commitments to become carbon-neutral by 2030, as set out in the One City Climate Strategy.</p>
Recommendations for Evidence Update	<ul style="list-style-type: none"> • Local Plan viability assessment to include evaluation of the optional Building Regulation requirements. • Evidence supporting existing Heat Priority Areas and combined heat and power (CHP) networks.

Draft Policy CCS3: Adaptation to a changing climate

Option 1 No new policy in relation to adaptation to climate change

This option is effectively a continuation of the current policy situation and would result in a reliance upon the existing adopted Core Strategy / SADMP policy approaches only with respect to climate change, sustainable design and construction (detailed within Policies BCS13 and BCS15 of the Core Strategy). As with Draft Policy CCS1, this option is not considered reasonable in light of changes to the current situation at both national and local levels.

Option 2 Introduce new policy in relation to adaptation to climate change

This policy option (‘March 2019 Consultation Option’) would involve new requirements for development to:

- Adapt to climate change at both site and building-level, including through design and avoidance of responses to climate change that would result in more intensive energy use and/or CO2 emissions.
- Incorporate climate change resilience over its lifetime for both current and future occupants and the surrounding environment. Under these provisions, the vulnerability of occupants should be accounted for in design proposals.

Issues of flood risk and water management would continue to be guided by retained Policy BCS16, which requires development to follow the sequential approach to flood risk management; and ensure it remains safe from flooding over its lifetime, including through the incorporation of sustainable drainage systems (SuDS), both of which are prescribed by the NPPF¹³⁹. By requiring

¹³⁹ NPPF Paragraphs 155-165.

development to account for flood resilience over its lifetime, the retained policy embeds the need to account for current and future climate change scenarios. This policy approach would thereby respond to the key sustainability issue of climate change mitigation and adaptation within the built environment.

Reasonable Alternative	Yes
Rationale	This option would be compliant with the NPPF requirements to address climate change in a proactive way within the Local Plan, to account for the immediate and long-term implications of flood risk (paras 155-65) and elevated temperatures; avoid vulnerability to climate change impacts within development; and reduce emissions through site specific measures (paras 149-150).
Recommendations for Evidence Update	<ul style="list-style-type: none"> Refresh evidence used to support retained policies in relation to water management (Policy BCS16) including an Updated Severn River Basin Management Plan (2015), Bristol Avon Catchment Plan (2016) and Bristol Strategic Flood Risk Assessment (SFRA). Update evidence supporting areas of Solar Potential.

Draft Policy CCS4: Resource efficient and low impact construction

Option 1 No new policy in relation to resource efficient and low impact construction

This option is effectively a continuation of the current policy situation and would result in a reliance upon the existing adopted Core Strategy / SADMP policy approaches with respect to climate change, sustainable design and construction (detailed within Policies BCS13 and BCS15 of the Core Strategy). As with Draft Policy CCS1, this option is not considered reasonable in light of change to the current situation, including the requirement to update the existing policy following withdrawal of the national Code for Sustainable Homes in 2015.

Option 2 Introduce new policy in relation to resource efficient and low impact construction

This policy option ('March 2019 Consultation Option') would introduce new requirements for development to consider resource efficiency and the impact of construction. Under this option, development is expected to address key issues including the nature of materials to be utilised, incorporating their type, life cycle and source; waste and recycling during construction and operation of development; and opportunities for the integration of measures to enhance the biodiversity value of development.

This option would also incorporate circular economy principles within policy text, to include the following requirements for new development:

- To account for energy, carbon emissions and other environmental impacts arising from construction of development and end of life demolition and disposal;
- For 'super-major' development proposals, the expectation that these be supplemented by a whole-life assessment of materials utilised; alongside a site waste management plan for the construction phase; and
- To maximise recycling and re-use of demolition materials.
- To demonstrate through its Sustainability Statement how resource efficiency and construction impact requirements have been fulfilled.

Reasonable Alternative	Yes
Rationale	By promoting efficient use of natural resources, reuse of existing resources and

	<p>encouraging transition to a low carbon economy, this option aligns with objectives of the NPPF (paras 8 and 148). This option would accord with Climate Change Act 2008 (2050 Target Amendment) Order 2019, which contains a legally binding commitment for the UK to achieve net zero by 2050. It would also be in alignment with the 25-year Environment Plan target of zero avoidable waste by 2050.</p> <p>This option would also ensure that the Local Plan directly contributes to meeting Bristol’s commitments to become carbon-neutral by 2030, as set out in the One City Climate Strategy.</p>
Recommendations for Evidence Update	External studies prepared in relation to planning requirements for energy use and low carbon construction in new development (including resource efficiency / circular economy).

Case study reference: The Draft London Plan under Policy S12 requires developments to submit energy strategies detailing proposals to minimise the embodied carbon in construction (i.e. the carbon footprint of materials utilised).

Draft Policy CCS5: Renewable energy development

Option 1 No policy in relation to renewable energy development

This option is effectively a continuation of the current policy situation, which would result in a reliance upon the existing adopted Core Strategy / SADMP policy approaches with respect to sustainable energy (detailed within Policy BCS14 of the Core Strategy).

Option 2 Introduce new policy in relation to renewable energy development

This policy option (‘March 2019 Consultation Option’) would set out a positive approach to renewable energy development proposals within the local authority area; alongside provisions for the assessment of such schemes through the development management process, where significant weight will be afforded to environmental and economic benefits of the proposals in alignment with paragraph 154 of the NPPF.

This option is based on existing evidence covering Bristol’s potential for on-site and building integrated renewable heat, cooling and power. It identifies broad locations for other renewable energy and low carbon heat sources, including the floating harbour and waste heat from industrial processing at Avonmouth. Alongside large-scale freestanding installations, this option could support new community-led renewable energy schemes, as scale is not specified within the draft policy text. This option would therefore be compliant with the NPPF (paragraph 152).

While the principles of existing policy BCS14 with regards to renewable energy would largely be retained, this option would not include provisions in relation to renewable energy generation and CO2 emissions from residual energy use in new buildings (regulated and unregulated emissions) as these are proposed within Draft Policy CCS2.

Reasonable Alternative	Yes
Rationale	By including a positive approach for renewable energy development, identifying suitable areas for renewable and low carbon energy (specifically at Avonmouth), this option would comply with guidance contained in the NPPF (paragraphs 151-154).

	<p>This option would accord with Climate Change Act 2008 (2050 Target Amendment) Order 2019, which contains a legally binding commitment for the UK to achieve net zero by 2050. This option would also ensure that the Local Plan directly contributes to meeting Bristol’s commitments to become carbon-neutral by 2030, as set out in the One City Climate Strategy.</p>
<p>Recommendations for Evidence Update</p>	<ul style="list-style-type: none"> • Develop evidence for renewable energy potential / sustainable energy generation within Bristol. • Evidence supporting existing Heat Priority Areas, district heating networks that include tri-generation (Combined cooling, heat and power), and areas of Solar Potential.

Stage 3: Assessment and evaluation of effects

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

In terms of difficulties encountered in identifying reasonable alternatives of policies under this theme, the following specific issues were considered:

- The Draft Policies within the March 2019 Consultation on the Local Plan were prepared in advance of formal publication of additional evidence base studies, and therefore could be subject to technical amendment in light of findings;
- A relatively dated Citywide Sustainable Energy Strategy evidence base (published in 2009), which includes an assessment of existing renewable energy and low carbon energy sources within the city. Therefore, evidence supporting the potential for renewable energy development requires an update to ensure an optimal strategic approach to meet future demand; and
- Given the withdrawal of the JSP, there is currently an absence of a strategic approach climate change, including where its impacts are experienced in cross boundary ways, and the adoption of agreed strategic sustainable development standards which would inform Local Plan preparation.

Summary of assessment findings

Selected Approach for CCS1 Policy - Option 2

Draft policy option 2 would introduce higher sustainable design standards (BREEAM) and include an optional technical requirement with regards to water efficiency, to require that development to include performance standards above existing Building Regulations. It is considered that inclusion of such standards would improve the sustainability baseline of the built environment and generate cumulative effects across the Plan area, particularly for sustainable resource management, energy use and adaptation to climate change.

Selected Approach for CCS2 Policy - Option 2

Draft policy option 2 would introduce higher regulated CO2 emission reduction targets for new development than current exist under Policy BCS14 and would therefore help achieve positive effects for local climate change resilience and attaining net zero carbon emissions. It would also contribute towards delivery of net zero carbon within development through ensuring carbon offsetting takes place to mitigate and address any shortfall in emissions reduction following on-site measures. With guidance also provided within the policy for offsetting solutions, this option would

likely enable positive sustainability effects in relation to delivery of a net gain in renewable energy to transition the Bristol's energy reliance away from non-renewable sources.

This option would also include additional design guidance for development for heating and cooling systems, with the need for development proposals to demonstrate compliance with policy within their respective Energy Strategy. This policy would therefore encourage greater transparency with regards to incorporating zero carbon development requirements and design considerations for within proposals.

Selected Approach for CCS3 Policy - Option 2

While the Policy Option includes similar site specific and building level adaptive measures to existing Policy BCS13, by specifying that development proposals are to be underpinned by an Adaptation Strategy that includes technical assessment of risk against current and future climate change scenarios, this Policy Option would go a step further than existing policy in terms of responding to the localised effects of climate change within urban development. In addition, the adaptive measures set out within this Policy Option are also underpinned by CCS2 net zero requirements, which would therefore increase the probability of cumulative and synergistic effects for carbon reduction across the Plan area.

Selected Approach for CCS4 Policy - Option 2

By requiring greater consideration of resource efficiency and impact of construction within development proposals, this draft policy option represents a stronger performing policy when benchmarked against the current situation within existing policies. This option would likely generate positive benefits across SA Objectives particularly with regards to waste management and carbon emissions and would have synergistic effect where introduced in combination with Policy CCS2, where the overall effect would be to contribute towards zero carbon through embedding policy requirements across the development life-cycle.

Selected Approach for CCS5 Policy - Option 2

It is considered that this draft policy option would contribute towards a step-change in the delivery of renewable energy development, including meeting the target for delivery of heat networks that will be zero carbon by 2050.

Grouped Policy Theme Recommendations

- Develop a Climate Change SPD update / Energy Statement Guidance and Sustainable Construction Checklists for prospective developers;
- Define 'zero carbon' to increase clarity for developers and ensure that there is no need to retrofit mitigation or adaptation measures later;
- Ensure integration of Climate Change policies across the Local Plan – including through the provision of multi-functional green infrastructure, which can reduce urban heat islands, manage flooding and help species adapt to climate change; maximising energy efficiency across development; strategic flood risk management; sustainable transport; approach to increasing water quality;

- Considering future climate risks when allocating development sites to ensure risks are understood over the development's lifetime;
- Promoting adaptation approaches within design policies for both developments and the public realm;
- Include reference to avoiding maladaptation (adaptation that could become more harmful than helpful). For example, designing buildings to maximise solar gain in winter without thinking through the implications for overheating in summer;
- Include references to designing in flexibility to allow future adaptation / futureproofing; and
- Consider a joint approach to net zero within building and transport sectors, based on the recent CCC Report¹⁴⁰, and look for efficiencies within Local Plan policy as a key regulator of emissions from building and transport.

¹⁴⁰ Committee on Climate Change (2019). Net Zero – The UK's contribution to stopping global warming.

Draft Policy CCS1: Climate change, sustainable design and construction

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to climate change, sustainable design and construction within the Local Plan							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	+/?	+	+	I	Both	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	0/?	0/?	0/?	I	Both	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	CR: Set out the benefits of embodied carbon on previously developed sites and reuse of existing buildings.
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	+/?	+/?	+/?	Both	Both	Local and City-wide	R: Public health. AG: Bristol's population.	CR: Include reference to retained and draft transport DM policies. CR: Include reference to air quality policies for site and building-level adaptations to local climate.
Economy and Employment	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	n/a
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide	R: Cultural heritage; built environment; AG: Bristol's population.	CR: Include reference to existing and draft design and conservation policies. MB: Reference to use of natural resources / design that would respond to existing built environment, including heritage assets.
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	+/?	+/?	+/?	I	P	Local; City-wide; trans-boundary	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM: Reference need to conserve / retain ecological networks and climate refugia within site-level adaptations.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+/?	+/?	+/?	D	P	Local; City-wide; trans-boundary	As above.	AM: Loss of GI should be replaced where it would enhance cohesive GI network. CR: Existing policy in relation to GI within development. MB: Reference to design guidance / exemplar designs in relation to GI; and any updated strategic GI strategy.
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	MB: Revise 'encourage active travel' to 'maximise opportunities for active travel', to ensure delivery of sustainable transport is prioritised within development objectives.
	14. To maintain and improve the existing highway network	DMC30 DMC31	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	Both	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Include reference to adaptive measures against latest climate change projections for flood risk, and reference to SuDs for water efficiency and harvesting. MB: Require buildings in current and future Flood Zone 3 to be resilient to flooding against climate change projections, based on the Environment Agency's response provided at LPR Consultation. CR: Retained Policy BCS16.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	+/?	++/?	+/?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	AM: Development adjacent to underground or surface water bodies should be required to mitigate where harmful abstraction is proposed (25-Year Environment Plan; PPG).
	17. Minimise air and noise pollution	DMC38	+/?	+/?	+/?	I	Both	Local; City-wide; trans-boundary	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+/?	++/?	+/?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	n/a
Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would set out the requirement for new development to achieve sustainable design standards (BREEAM) and include the technical requirement for water efficiency, which is optional under existing Building Regulations Approved Document G2. This option would rely upon provisions set out in following draft policies CCS2-CCS5, alongside retained Policy BCS16 in relation to flood risk, to ensure development contributes towards local and the UK's statutory zero carbon ambitions and considers long-term climate change scenarios.</p> <p>Scale of effects: The scale of effects would be predominantly localised and attributable to the individual site level and adjacent receptors; however, would also create cumulative city-wide effects through inclusion of guidance in relation to mitigating climate change. These city-wide effects would be created through energy efficiency measures which would reduce demand on the grid, a step-change in the transition towards use of renewable energy sources, and carbon-neutral materials within development.</p>									

Social, economic and environmental effects:

- This option could likely cause minor positive effects for DM3 (SA Objective 1) in the medium-long term, on the basis that this could support a mix of residential development without resulting in harm to existing and future communities. This would specifically be achieved through site-level adaptations and types of new homes; and through the requirement for major development proposals to demonstrate a BREEAM for Communities “Excellent” rating. Given the ‘short-term’ timeframe consists of year 1-5 of the Plan, this policy option may be likely to have unknown effects for delivery of major residential development in the short term based on timescales for site development.
- While this policy would be integral to sustainable development on previously developed land, it does not itself direct development to such locations as this is guided by other draft policies. Therefore, the effects against SA Objective 2 are neutral.
- Similar to SA Objective 1, this option has the potential to produce minor positive effects for SA Objective 5 where major residential development is required to demonstrate a BREEAM for Communities “Excellent” rating. By requiring development to comply with this technical standard, this option could generate a positive multiplier effect for local economy and regeneration of the built environment. However, the degree of this effect is based on the extent to which a development could create jobs, enhance incomes and improve on existing economic activity compared to the local area and the surrounding economy.
- As this policy option would stipulate that development should adapt to climate change and set out measures for building level adaptations, including a need to account for the comfort of occupiers over the lifetime of development, it is considered that this option would have potential for minor positive indirect effects on health and wellbeing (SA Objective 6).
- This option could produce minor positive effects against SA Objective 8, as the policy could support the delivery of carbon neutral employment (including supply chain employment) through encouraging low carbon and renewable energy technologies. However, effects are also unknown given that detail is attributable to design proposals and site-specific considerations.
- The effects of this option against SA Objective 10 are considered to be unknown. Whilst this policy does not directly influence the protection and enhancement of the historic environment, proposals for low carbon and innovative technologies or adaptations may have effects on the historic environment if these do not conserve or enhance the historic character or setting. The effects are unknown and are dependent on design proposals, site-specific considerations and the degree of mitigation proposed.
- This option could likely produce minor positive and unknown effects for SA Objectives 11-12, as the policy specifies the use of green infrastructure (GI) as an adaptive measure in response to climate change. However, benefits to provision of GI is contingent upon both the scale and siting of development (i.e. extent of GI integrated) and the extent of biodiversity net gain proposed, and therefore the effects are partly unknown.
- By including mitigation measures that seeks to increase active and sustainable forms of transport directly within this policy, it is considered that this option would likely have minor positive effects under SA Objective 13. As with other SA Objectives, effects of this option are also unknown given that much of this detail is attributable to design proposals, extent of mitigation proposed and site-specific considerations.
- While the suite of draft policies under this policy theme include references to flood risk and management, this option (Draft Policy CCS1) does not explicitly reference flood risk within the context of climate change mitigation. This issue is responded to instead by retained Policy BCS16. Although climate change adaptation implies the need to account for flood risk at a site and strategic level, the direct effects of this option against SA Objective 15 are therefore unknown.
- This option would likely generate direct minor and significant positive effects under SA Objectives 16 and 18, as the policy references the need to mitigate climate change through efficient use of natural resources in new buildings; and utilise renewable and low-carbon forms of energy within development. It is considered that the potential for positive effects against both Objectives would increase as technology and application of sustainable materials / methods become both more available and more affordable to the market. Given the degree to which effects are positive are based upon design and forms of mitigation proposed, effects are also partly unknown. Beyond the plan period, it is unclear whether new standards may become available as technology evolves, therefore the ongoing latent effect is likely to be minor positive.
- By encouraging use of renewable and low-carbon energy supply systems and connection to low carbon heat networks, alongside more sustainable means of transport through development, this option has the potential to generate indirect minor positive effects for local air quality (SA Objective 17). Again, this remains contingent on design, location of development with respect to areas of existing air quality (including AQMAs) and the degree of mitigation proposed, so is partly unknown in effects.

Draft Policy CCS2: Towards zero carbon development

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to zero carbon development, to include carbon offsetting							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	-/?	?	?	I	Both	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design. AM: As required by the Planning Practice Guidance, prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies (such as this one) is not of a scale that will make the plan (and ambitions to exceed 33,500 homes) undeliverable. CR: Ensure climate change and sustainability policies are included within policy requirements for final Development Strategy areas.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	0/?	0/?	0/?	I	Both	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
	4. Increase participation in cultural and community activities	DMC9	-/?	?	?	I	Both	Local and City-wide	R: Cultural heritage, public health; AG: Bristol's population.	
	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	-/?	?	?	I	Both	Local	R: Local housing market; local economy, Bristol's population; AG: Bristol's population.	
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	0/?	0/?	0/?	I	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	-/?	?	?	I	Both	Local	R: Local housing market; local economy, Bristol's population; AG: Bristol's population.	
	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
	Health and Inequalities	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide	
11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats		DMC25 DMC26	+/?	+/?	+/?	I	P	Local; City-wide; trans-boundary	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	
12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation		DMC27	+/?	+/?	+/?	D	P	Local; City-wide; trans-boundary	As above.	
Economy and Employment	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
	14. To maintain and improve the existing highway network	DMC30 DMC31	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
	15. To reduce the risk of flooding from all sources	DMC32 DMC33	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Townscape and Landscape	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	+/?	++/?	+/?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	
	17. Minimise air and noise pollution	DMC38	+/?	+/?	+/?	I	Both	Local; City-wide; trans-boundary	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	
Transport	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+	++	+	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	

Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would introduce additional requirements in relation to zero carbon development, including the setting of new targets for energy efficiency and renewable energy generation to attain overall net zero regulated carbon emissions in new development. This option requires remaining emissions to be mitigated through appropriate carbon offsetting measures. It also would include different provisions in respect of change of use or conversion of existing buildings to encourage adaptation.</p> <p>Scale of effects: The scale of effects would be predominantly localised and attributable to the individual site level and adjacent receptors; however, this policy option could also create cumulative city-wide effects including through carbon-offsetting measures.</p> <p>Social, economic and environmental effects: As Draft Policy CCS1 operates as a framework policy for the remaining draft policies within the theme of Climate Change and Sustainability, the effects of this option when appraised against SA Objectives are similar to CCS1 Option 2 (see above analysis) for Objectives 2, 10,11, 12, 16, 17 and 18. Differences in outcomes of effect and/or particular causes for such effects are set out below.</p> <ul style="list-style-type: none"> • For assessment against the decision-making criteria under SA Objectives 1, 4, 5 and 7, this option may have limited, minor negative and unknown indirect effects in the short term, based upon an assumption that the introduction of higher carbon emission reduction targets and particularly requirements for financial contributions to off-setting may impact viability. This potential effect could apply to both new residential and non-residential development, including for educational and cultural facilities, retail and employment space. However, as this effect is dependent on market conditions and other site-specific considerations this is also unknown. It is considered that this factor would become increasingly unknown in the medium to long term. • This policy option would likely have similar unknown effects for delivery of employment space (SA Objective 8) as set out above, based on viability considerations. However, given that the policy would directly support the delivery of carbon neutral employment (through requirements for both on-site, off-setting measures and through supply chain), it is considered that this option is likely to impart minor positive effects specifically for decision-making criteria DMC21. • As this policy option specifically addresses energy use in new development and introduces requirements for development to incorporate energy efficiency measures; sustainable mechanisms for meeting heat and cooling demand sustainably; on-site renewable energy generation; and account for outstanding reduction in residual emissions via carbon offsetting, it is considered to generate a combination of minor and significant positive benefits when appraised against SA Objectives 16 and 18. The extent to which regulated CO2 emissions are reduced through energy efficiency measures and on-site renewable energy generation would vary by proposal and be influenced by design, funding and site constraints, amongst other considerations. However, by setting clear targets which future development are expected to conform with, this policy would likely secure direct positive effects for delivering net zero carbon within Bristol. Beyond the plan period, it is unclear whether new standards may become available as technology evolves (for example, through carbon negative installations), therefore the ongoing latent effect is likely to be minor positive. • Similar to CCS1 Option 2, as this option would directly require use of renewable and low-carbon energy supply systems and connection to low carbon heat networks, this option has the potential to generate indirect minor positive effects for local air quality (SA Objective 17). Again, this remains contingent on design, location of development with respect to areas of existing air quality (including AQMAs), and the degree of mitigation proposed.
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Draft Policy CCS3: Adaptation to a changing climate

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to adaptation to climate change							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Medi	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	0/?	0/?	0/?	I	Both	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	0/?	0/?	0/?	I	Both	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	CR: Ensure climate change and sustainability policies are included within policy requirements for final Development Strategy areas.
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	+/?	+/?	+/?	Both	Both	Local and City-wide	R: Public health. AG: Bristol's population.	CR: Include reference to transport DM policies; and health and wellbeing policies. CR: Include reference to air quality policies for site and building-level adaptations to local climate.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	0/?	0/?	0/?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	n/a
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide	R: Cultural heritage; built environment; AG: Bristol's population.	CR: Include reference to existing and draft design and conservation policies. MB: Reference to use of natural resources / design that would respond to existing built environment, including heritage assets.
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	+/?	+/?	+/?	I	P	Local; City-wide; trans-boundary	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM: Reference need to conserve / retain ecological networks and climate refugia within site-level adaptations.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+/?	++/?	+/?	D	P	Local and City-wide.	As above.	CR: Existing policy in relation to GI within development; reference to biodiversity net gain through GI. MB: Reference to design guidance / exemplar designs in relation to GI; and any updated strategic GI strategy. Include potential for integration with existing GI to maximise benefit to both placemaking and ecological networks.
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	14. To maintain and improve the existing highway network	DMC30 DMC31	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Include reference to adaptive measures against latest climate change projections for flood risk; SuDS design guidance. CR: Retained Policy BCS16. CR: Include examples of how to minimise the risk and impact of flooding, such as raising floor levels and using flood resilient measures, as suggested by the Environment Agency in LPR Consultation (March 2019).
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	+/?	+/?	+/?	D	Both	Local	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	AM: Development adjacent to underground or surface water bodies should be required to mitigate where harmful abstraction is proposed (25-Year Environment Plan; PPG).
	17. Minimise air and noise pollution	DMC38	+/?	++/?	+/?	I	Both	Local and City-wide.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+/?	++/?	+/?	D	Both	Local and City-wide.	R: Natural environment (water); AG: Bristol's population; local wildlife.	n/a
Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would set out expectations for development proposals to include site and building-level adaptations to climate change, requiring an Adaptation Strategy for new development that accounts for the most recent climate change projections. As part of this option, health and wellbeing of current and future occupiers are to be considered through proposals, with proportionate consideration given to vulnerable demographic groups.</p> <p>Scale of effects: The scale of effects would be predominantly localised and attributable to the individual site level and adjacent receptors; however, would also create cumulative city-wide effects where adaptive measures are applied to development at both building and site level.</p> <p>Social, economic and environmental effects: As Draft Policy CCS1 operates as a framework policy for the remaining draft policies within the theme of Climate Change and Sustainability, the effects of this option when appraised against SA Objectives are similar to CCS1 Option 2 (see above analysis) for Objectives 2, 5, 6, 10,11, and 18. Differences in outcomes of effect and/or particular causes for such effects are set out below.</p>									

- As the targets for zero carbon development are contained within CCS2, this policy option is considered to produce the same minor neutral / unknown effect as CCS2 Option 2 (see above analysis) across SA Objectives 1, 2 and 8; overall assessment of this policy option against these Objectives is therefore uncertain.
- When appraised against SA Objective 12, this policy option has the potential to produce minor – significant positive effects, as it explicitly requires development to include use of multi-functional green / blue infrastructure in its design. Whilst it is unclear what the policy position would be beyond the plan period, the positive effects of GI provision would continue in the long-term.
- This policy option provides a requirement to minimise flood risk and impacts through site level adaptations and maximising the benefits of blue and green infrastructure, and is therefore likely to generate direct, minor positive effects across the short to long term (SA Objective 15). By requiring proposals to account for the most up to date climate change scenarios, this option would encompass the management of long-term flood risk at a site level. The scale of effect would be reliant on design details; location of development with respect to areas of existing and future flood risk; the degree of mitigation proposed; and the accuracy of flood risk modelling based on climate change scenarios, the effects of this option are partly unknown. Effects of this policy option against SA Objective 15 are not considered significant positive due to the overall focus of the policy on general climate change adaptation measures; the absence of a presumption against development on all types of flood risk; or reference to methods to mitigating or minimising impact of flood risk.
- This option is also likely to provide minor indirect positive benefit to local air quality (SA Objective 17), as the policy specifies the requirement for development to avoid responses to climate impacts which lead to increases in energy use and carbon dioxide emissions. By encouraging use of measures such as sustainable active cooling, this policy option would limit the extent of emissions from new development to improve the local air quality baseline. However, as only one type of pollutant is referenced due to the overall purpose of this policy being linked to the built environment-based emissions rather than industrial waste or transport, it is considered that the positive effects of this policy against this SA Objective are limited.

Draft Policy CCS4: Resource efficient and low impact construction

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to resource efficient and low impact construction							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/- / ?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	?	?	?	I	Both	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	0	0	0	I	Both	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	n/a.
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those in areas of concentrated disadvantage	DMC10 DMC11	0/?	0/?	0/?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	MB/CR: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	0/?	0/?	0/?	Both	Both	Local and City-wide	R: Public health. AG: Bristol's population.	As above, plus: CR: Include reference to retained and draft transport DM policies.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	MB: Incentivise use of local procurement / supply chains within development. Consider the social value of supply chain.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide	R: Cultural heritage; built environment; AG: Bristol's population.	CR: Include reference to existing and draft design and conservation policies. MB/AM: Reference to use of natural resources / design that would respond to existing built environment, including heritage assets.
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	+/?	+/?	+/?	I	P	Local; City-wide; trans-boundary	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	MB/AM: Reference to use of natural resources / design that would respond to the natural environment, including biodiversity / geodiversity assets (i.e. green roofs).
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+/?	+/?	+/?	D	P	Local; City-wide; trans-boundary	As above.	AM: Loss of GI should be replaced where it would enhance cohesive GI network. CR: Existing policy in relation to GI within development. MB: Reference to design guidance / exemplar designs in relation to GI; and any updated strategic GI strategy.
	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Transport	14. To maintain and improve the existing highway network	DMC30 DMC31	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	15. To reduce the risk of flooding from all sources	DMC32 DMC33	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Climate, Energy and Waste	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	++/?	++/?	++/?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	MB: Include reference to socio-economic sustainability of construction process and incentivise use of local procurement / supply chains within development. AM: Consider inclusion of 'embodied' carbon emissions alongside materials within policy requirement for whole-life assessment of development. AM: Meeting or exceeding the recycling targets for waste streams and generating low-carbon energy from suitable remaining waste, with reference to specific targets.
	17. Minimise air and noise pollution	DMC38	+/?	+/?	+/?	I	Both	Local; City-wide; trans-boundary	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2 to ensure construction impacts are managed.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+/?	+/?	+/?	D	Both	Local; City-wide; trans-boundary	R: Natural environment (water); AG: Bristol's population; local wildlife.	n/a
Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would set out expectations for development proposals to integrate considerations of resource efficiency and low impact construction; and promote a 'circular economy' approach for development within Bristol, including by encouraging major and super-major development to account for whole-life systems and sustainable waste management.</p> <p>Scale of effects: The scale of effects would be both local, city-wide and trans-boundary, as the policy option relates to use of sustainable construction materials, processes and water management (both during construction, operation, and post-operation).</p> <p>Social, economic and environmental effects: As Draft Policy CCS1 operates as a framework for the remaining draft policies within the Climate Change and Sustainability team, the effects of this option when appraised against SA Objectives are similar to CCS1 Option 2 (see above analysis) for Objectives 2, 5, 6, 10 and 11. Differences in outcomes of effect and/or particular causes for such effects are set out below.</p> <ul style="list-style-type: none"> This option would perform similarly against SA Objectives 10 and 11, where effects upon the natural and historic built environment are unknown due to dependencies on site location, design and the status of any listed assets or sensitivity of designated sites. 									

While dependent on site and design specific details, this option would encourage all new developments to enhance the biodiversity value of development and is therefore considered to have potential for minor positive and unknown effects at site and/or building-level. Negative effects potentially could be mitigated through cross-referencing relevant design and conservation and GI policies. Given this policy option specifically addresses the need for sustainable resource management in construction and design, this option would likely generate a greater degree of positive effects for SA Objective 16. By requiring new development to consider life cycle of materials; maximise recycling and re-use of demolition materials, this option would contribute to increased resource management. Requiring consideration of local supply chains and local labour could maximise opportunities for resource efficiency through reduced travel (in combination with CCS2).

- As this policy relates to use of low carbon materials and low impact of construction, the positive effects of emission reduction (SA Objective 17 and 18) are likely to be more related to supply chain. However, use of sustainable materials on-site would bring benefits to air quality where introduced with other policies (namely, CCS2), and there remains potential for wider roll-out of materials that degrade air pollution sources such as NOx (e.g. graphene).

Draft Policy CCS5: Renewable energy development

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to renewable energy development							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	?	?	?	I	Both	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design. MB: Include reference to support for community-led renewable schemes within mixed-use / residential led development.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	0/?	0/?	0/?	I	Both	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	CR: Ensure reference to renewable energy (micro / community-led) is included within policy requirements for final Development Strategy areas.
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	MB: Reference direct support within the policy for renewable and low carbon energy generation developments that are led by, or meet the needs of, local communities.
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those in areas of concentrated disadvantage	DMC10 DMC11	?	?	?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	0	0	0	Both	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	n/a
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	?	?	?	Both	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	n/a
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide	R: Cultural heritage; built environment. AG: Bristol's population.	CR: Include reference to existing and draft design and conservation policies.
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	P	Local; City-wide; Trans-boundary.	R: Local wildlife and biodiversity; natural environment. AG: Bristol's population; wildlife.	As above, plus: CR: GI and biodiversity policies. AM: Presumption against development that would cause undue harm to assets.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	D	P	Local; City-wide; Trans-boundary.	As above.	AM: Loss of GI should be replaced where it would enhance cohesive GI network. CR: Existing policy in relation to GI within development.
	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	?	?	?	I	Both	Local and City-wide.	R: Bristol's transport and energy network; AG: Bristol's population; transport sector.	n/a
	14. To maintain and improve the existing highway network	DMC30 DMC31	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Transport and Movement	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	Both	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	MB: Include reference to adaptive measures against latest climate change projections for flood risk. CR: Retained Policy BCS16.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	+/?	+/?	+/?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	AM: Development adjacent to underground or surface water bodies should be required to mitigate where harmful abstraction is proposed (25-Year Environment Plan; PPG).
	17. Minimise air and noise pollution	DMC38	+/?	+/?	+/?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Air pollution mitigation proposed within draft policy HW2.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	++/?	++/?	++/?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	AM: Update evidence for renewable energy potential (including existing Heat Priority Areas; areas of Solar Potential etc).
Climate, Energy and Waste	<p>Rank Score: 1 – This Policy Option would set out the updated approach to the positive delivery of renewable energy development across the city, based upon the Citywide Sustainable Energy Strategy.</p>									
	Evaluation of Effects	<p>Scale of effects: The scale of effects would be predominantly localised and attributable to the individual site level and adjacent receptors; however, this could also create cumulative city-wide effects where the policy would support delivery of renewable energy schemes, including small scale integrated schemes and larger, bespoke installations.</p> <p>Social, economic and environmental effects: Whilst Draft Policy CCS1 operates as a framework for the remaining draft policies within the theme of Climate Change and Sustainability, this policy option is considered to differ in effect outcomes and/or particular causes for such effects for several SA Objectives, as set out below.</p> <ul style="list-style-type: none"> This option is considered to have unknown effects for residential development (SA Objective 1 and 2) based on the assumption that there would be limited conflict in including small-scale renewable energy on site; however, there could be minor-negative or 								

unknown effects for SA Objectives 1 and 8 where large-scale installations may have significant land take.

- This option is considered to have potential to produce unknown indirect effects when appraised against SA Objective 5. While the development of renewable energy may foster regeneration and thereby lead to improvement in economic outcomes for communities and/or the built environment, this remains contingent on the scale of investment proposed and proposed location, so effects are unknown.
- The draft policy states that impacts on biodiversity, landscape character, the historic environment and residential amenity of the surrounding area will be afforded significant weight. Effects on these receptors are therefore uncertain, and subject to implementation.
- By setting out a positive approach to the delivery of renewable energy development, this policy option may have indirect minor positive although uncertain benefits for SA Objective 13. It is considered that through increasing overall network capacity from renewable energy sources, there would be gains for improving the quality of low and zero-carbon modes of sustainable transport.
- As this option specifically addresses positive development of renewable energy schemes, it is considered that it could generate significant positive benefits for SA Objective 18, which would likely become more significant as these are integrated to existing and future networks, to provide cumulative benefit across the Plan area. The benefit of low carbon / renewable energy is limited by the capacity of existing and planned energy networks, and it is plausible there may be unequal allocation of such benefits for different areas dependent on the location and/or funding of these networks.

Draft Policies DC1 – DC3: Assessing the Effects of Design and Conservation Policies

Design and Conservation

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

Based on the SA Scoping Report 2018 and Update Note 2020, key sustainability issues are identified as follows:

- Increased demand for housing (including affordable housing) and rising property prices within Bristol's market;
- The need to balance provision of new residential and commercial development with retaining the character of Bristol's varied townscape and green infrastructure;
- A substantial number of designated heritage assets and Conservation Areas within Bristol, which need to be accounted for in the context of future development.

Since the adoption of both the Core Strategy (June 2011) and Site Allocations and Development Management Policies (2014), the Government introduced a new technical space standard¹⁴¹ which describes internal space within new dwellings. It sets out requirements for the Gross Internal (floor) Area (GIA) of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key components of dwellings. Unlike other aspects of the Housing Standards Review¹⁴², this space standard has not been incorporated into the Building Regulations. As set out in updated PPG, establishing compliance is therefore the responsibility of the LPA¹⁴³.

Since the development of the policy in March 2019, the Building Safety Bill has been published in draft form¹⁴⁴ in response to national concern about the management, quality and design of housing provision. This will improve building regulations as the Government seeks to bring forward a clearer system with residents' safety at its core. On the basis that fire risk of a building increases with height, the Bill proposes to enforce a new, more stringent set of rules that will apply to buildings of 18 metres or more, or taller than 6 storeys. The Bill and its underpinning evidence therefore have implications for the Local Plan's future development of policies in respect of tall buildings and liveability standards.

The NPPF also makes it clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. The updated PPG states that good design (such as giving careful consideration to a building's massing and layout of habitable rooms) will be necessary to help make the best use of the site and maintain acceptable living standards¹⁴⁵.

Published since the March 2019 draft policy, the National Design Guide¹⁴⁶ forms part of the national planning practice guidance (PPG) and prescribes 'ten characteristics' as the Government's priorities

¹⁴¹ DCLG (2015). Technical housing standards – nationally described space standard.

¹⁴² DCLG (2015). Housing Standards Review: technical consultation

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418714/150324_HSR_Tech_consultation_Summary_of_Responses_FINAL.pdf

¹⁴³ Paragraph: 021 Reference ID: 56-021-20150327.

¹⁴⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/90186/7/Draft_Building_Safety_Bill_Web.pdf

¹⁴⁵ Paragraph: 007 Reference ID: 66-007-2019072

¹⁴⁶ MHCLG (2019). National Design Guide - Planning practice guidance for beautiful, enduring and successful places.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf

for well-designed places, including identity, built form and resources. While setting out national guidance, the Guide states that specific, detailed and measurable criteria for good design are most appropriately set out at the local level.

Research commissioned in 2020 for the MHCLG¹⁴⁷ indicates an emerging sustainability issue in the discrepancy between development consented through planning applications and that delivered through permitted development rights in their compliance with national space standards. This has led to concern that vulnerable people are being placed in accommodation that falls short of space standards, often in remote locations in the city; and highlights a key sustainability issue which may worsen over time.

Policies under ‘Design and Conservation’ of the Draft Local Plan are set out in Table 9. The grouped policies under this theme seek to directly meet the requirements of the following Local Plan Objectives to:

- ‘Promote urban living across the city with a focus on brownfield land – encouraging developments of homes with urban character form and design in well-designed, connected, healthy and accessible neighbourhood which achieve a liveable environment’;
- ‘Protect our valued open spaces to support a liveable, healthy city’; and
- ‘Encourage innovation in the design, construction and location of diverse housing solutions; diversify the housing offer, promoting new building types and tenures such as build for rent, housing for older people and self-build’.

The Draft Local Plan makes it clear that the main objectives of ‘Design and Conservation’ policies are broadly as follows:

- To ensure all new development in Bristol achieves high standards of urban design, whilst safeguarding or enhancing the historic environment; and
- To complement retained policies for attaining quality urban design by providing new approaches to achieving good design at higher densities, driven by an urban living approach.

The current situation is informed by proposals to retain Policies BCS21-22, DM27-30, DM32; and BCAP30-34 which establish the Local Plan’s approach to design and conservation for development; these would inform the implementation of Draft Policies DC1, DC2 and DC3. BCC’s supplementary planning document ‘Urban Living: Making Successful Places at Higher Densities’ (‘Urban Living SPD’) would provide further guidance to relevant draft policies under this policy theme.

Table 9 Relationship with other relevant plans and programmes

Draft Policy	NPPF	Other legislation or guidance	Retained Policies	Evidence
Draft Policy DC1: Liveability in residential development	Footnote 46. Paras 117; 124	Technical housing standards – nationally described space	<ul style="list-style-type: none"> • Retained Policy BCS21: Quality urban design • Retained Policy BCS22: Conservation and the historic environment 	Urban Living SPD (2018). Central Area

¹⁴⁷ Clifford et al. (2020). Research into the quality standard of homes delivered through change of use permitted development rights.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/902220/Research_report_quality_PDR_homes.pdf

including space standards	– 132.	standard (2015) Draft Building Safety Bill (20 July 2020) ¹⁴⁸ .	<ul style="list-style-type: none"> Retained Policy DM27: Layout and form Retained Policy DM28: Public realm Retained Policy DM29: Design of new buildings 	Context Study (2013). Bristol Heritage Framework (2015-2018).
Draft Policy DC2: Tall Buildings	Paras 122-123; 124 – 132.	Planning (Listed Buildings and Conservation Areas) Act 1990.	<ul style="list-style-type: none"> Retained Policy DM30: Alterations to existing buildings Retained Policy DM32: Recycling and refuse provision in new development 	
Draft Policy DC3: Local Character and Distinctiveness	Paras 124 – 132.	National Design Guide (2019). Living with Beauty – The report of the Building Better Building Beautiful Commission (2020).	<ul style="list-style-type: none"> Retained Policy DM31: Heritage assets Retained Policy DM32: Recycling and refuse provision in new development Retained Policy BCAP30: Pedestrian routes Retained Policy BCAP31: Active ground floor uses and active frontages in Bristol City Centre Retained Policy BCAP32: Quayside walkways Retained Policy BCAP34: Coordinating major development in Bristol City Centre 	

Stage 2: Identify, define and describe alternatives

For each of the draft policies, “policy off” options are not considered reasonable alternatives due to the change in the current situation following adoption of the current Local Plan. The principles of brownfield development, efficient use of land and intensification are key components for the delivery of housing and employment development, as set out within the Strategic Reasonable Alternatives, in Section 5 of the main report and supported by Urban Living principles. It is considered that without introduction of new policies for design in the context of higher density development, a “policy void” required to support other draft policies in relation to Urban Living (including Draft Policy UL1 and UL2) would remain.

In light of the above discussion, alternatives considered for each of the draft policies under ‘Design and Conservation’ Policy Theme are set out and elaborated in turn below.

Draft Policy DC1: Liveability in residential development including space standards

Option 1 No new policy in relation to liveability including space standards within the Local Plan

Given the identified key sustainability issues of increasing housing need across the city, and the resultant aspiration of the Local Plan to embed the principles of Urban Living, it is considered that there is an evidenced need to introduce policy in relation to residential liveability (Para 117 of the NPPF). A ‘no policy’ option is therefore not considered a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to liveability including space standards within the Local Plan

This option would introduce a specific policy in relation to liveability and space standards of new residential development (the ‘March 2019 Consultation Option’). The policy specifically requires that development proposals:

- Develop land to its optimum density (in line with the minimum densities set by Draft Policy UL2);
- Are consistent with other Local Plan policies that relate to liveability, including those for urban design, green infrastructure, pollution and noise, and adaptation to climate change; and

- Follow the supplementary guidance set out in the BCC Urban Living SPD.

The policy option includes a presumption against development that would not create a liveable environment for future occupiers and neighbouring development.

While setting out that the nationally described space standards represent an appropriate level for the majority of new permanent dwellings and their occupiers, this option would introduce a degree of flexibility for temporary accommodation where gross requirements and/or configuration of such space may not necessarily conform with the national standards. The policy sets out that accommodation for short term occupancy and/or for identified occupier groups should provide suitable internal space to meet requirements of such occupiers.

In addition, the policy introduces a specific requirement for new residential development (Use Class C3) intended for permanent or long-term occupation to incorporate high-quality, usable private amenity and play space of a proportion or type appropriate to the proposal, and in line with the Urban Living SPD.

Reasonable Alternative	Yes
Rationale	<p>This option would be compliant with nationally described technical housing standards; and updated PPG149 in relation to internal space standards. It would accord with NPPF requirements to create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users (para 127).</p> <p>It would also include inherent flexibility within the policy for temporary or short-term accommodation, which would allow the policy to contribute to meeting the local demand for relevant occupancy types such as emergency housing. By referencing the requirement for development to adhere to existing Urban Living SPD, this option would link the policy to established local design principles.</p>
Recommendations for Evidence Update	n/a

Alternative options for this draft policy focus on the degree of implementation rather than the overall principle, could employ a higher threshold for living standards (i.e. those that would exceed nationally described space standards). However, these options would require evidenced need and would be subject to the outcomes of the Local Plan viability assessment.

Draft Policy DC2: Tall buildings

Option 1 No new policy for tall buildings

This option is effectively the “policy off” alternative, which would result in a reliance upon the existing adopted Core Strategy / SADMP policy approaches (detailed within Policies BSC20 -22 of the Core Strategy and Policies DM2, DM4, DM26, DM27, DM32 of the SADMP). A change to the current situation includes the proposed introduction of Urban Living policies which encourage efficient use of land including development of tall buildings in locations identified for intensive forms of development and proposals that utilise airspace above existing development, a no policy option is not considered a reasonable alternative for the Local Plan Review.

Option 2 Introduce new draft policy in relation to tall buildings

¹⁴⁹ Paragraphs 018-022 Reference ID: 56-018-20150327; Paragraph: 023 Reference ID: 56-023-20160519.

This option would introduce a specific policy in respect of tall buildings (the ‘March 2019 Consultation Option’). It would encourage development of tall buildings within locations identified as being appropriate for intensive forms of development (as directed by Draft Policy UL1). The policy would require development proposals for new tall buildings to:

- Contribute positively to the character and function of the urban environment;
- Be designed and located to be visually attractive, creating a positive feature in the urban environment;
- Account for their individual and cumulative contribution with other existing and proposed tall buildings; and
- Demonstrate high-quality urban design, reflecting their wider impact on the urban environment and skyline.

The policy also sets out requirements that tall buildings do not cause harmful impact by excessive overshadowing and wind deflection; unduly dominating impacts on adjoining buildings and the public realm; and inappropriate visual impacts including on the setting of heritage assets. By referencing the requirement for development to adhere to existing Urban Living SPD, this option would link the policy to established local design principles.

Reasonable Alternative	Yes
Rationale	<p>The need for this option is derived from national policy and guidance relating to brownfield development and intensification (Planning for the Future White Paper 2020; NPPF), alongside the principles of good design within the National Design Guide.</p> <p>This option is integral to supporting the sustainable delivery of Bristol’s Development Strategy (including housing and employment growth) set out within the Local Plan. It would form part of the hierarchy of policies required to ensure that new intensive forms of development are designed to high standards and account for their multiple potential impacts on the existing built environment. This option would therefore be in alignment with national policy both in its requirements to safeguard and enhance the environment (NPPF paras 117-118) and achieve appropriate density based on identified need for efficient use of land (NPPF para 122-123).</p>
Recommendations for Evidence Update	<p>Updated Central Area Context Study (2013); Updated Bristol Heritage Framework (2015-2018). Additional Conservation Area Character Appraisals, spatial frameworks, and relevant supplementary planning documents or design briefs.</p>

Draft Policy DC3: Local Character and Distinctiveness

Option 1 No new policy in relation to local character and distinctiveness

Given the Local Plan objectives to address the housing need through Urban Living principles and the focus on brownfield intensification, there is a requirement to introduce policy within the Local Plan for new residential and mixed-use development to safeguard the built environment within (Para 117 of the NPPF). A ‘no policy option’ is therefore not considered a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to local character and distinctiveness

This option would introduce new policy with regards to urban design (the ‘March 2019 Consultation Option’). It would expand upon the requirements of Retained Policy BCS21, which requires that

development should contribute positively to the character and identity of the area it is located, to create or reinforce sense of local distinctiveness.

The policy seeks to introduce the assessment criteria that would be used to appraise a development proposal's response to local character and distinctiveness to ensure no harmful impact, to include the following requirements for development to:

- Respond appropriately and incorporate existing landforms, green infrastructure and historic assets and features;
- Respect or restore the local pattern and grain of development, including historic development of the area;
- Respond to local patterns of movement and scale, character and function of streets and public spaces;
- Retain, enhance and create important views into, out of and through the site;
- Make appropriate use of landmarks and focal features, and preserve or enhance the setting of existing landmarks and focal features;
- Complement the scale, massing, shape, form and proportion of existing buildings;
- Reflect locally characteristic architectural rhythms, patterns, features and themes; and
- Reflect the predominant materials, colours, textures, landscape treatments and boundary treatments in the area.

The option would maintain a presumption against permitting development considered to be harmful to local character and distinctiveness or where it would fail to take the opportunities available to improve the character and quality of the area and its functioning. It would also set out the requirements for development to:

- Retain existing buildings and structures that contribute positively to local character and distinctiveness, and where these are proposed to be lost due to wider planning benefits of the proposal, opportunities for reuse of materials sought as mitigation;
- Take reasonable opportunities to improve the existing area's character where this relates poorly to the surrounding development; and
- Ensure any backland development is subservient in height, scale, mass and form to the surrounding frontage building and causes no adverse impacts due to proposed access arrangements, so as to not prejudice opportunities to develop land of similar potential or negatively affect local character.

Reasonable Alternative	Yes
Rationale	<p>By setting out clear development requirements in relation to preserving and enhancing local character, this option would align with national guidance for achieving well-designed places as set out within the NPPF (paras 124-127), updated PPG and National Design Guide.</p> <p>Through including detailed policy assessment criteria, this policy option would complement the existing design policies and form a tool for future development management of proposals.</p>
Recommendations for Evidence Update	Updated Central Area Context Study (2013); Updated Bristol Heritage Framework (2015-2018). Additional Conservation Area Character Appraisals, spatial frameworks, and relevant supplementary planning documents or design briefs.

Stage 3: Assessment and evaluation of alternatives

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

- Reasonable alternatives for development of policy for tall buildings are influenced by the Local Plan's Development Strategy for housing and employment identified in the Strategic Reasonable Alternatives Section 5 of the main report.
- Existing evidence base documents, including the Central Area Context Study, are considered to be relatively dated at the time of writing this Interim SA. While general design principles are established within Urban Living SPD and draft policy DC3, the case for introducing draft policies under this theme could be strengthened with area-specific evidence.

Summary of assessment findings

Selected Approach for DC1 Policy - Option 2

Under Option 1, private outdoor space and internal space standards within new development for permanent or long-term occupation would not be explicitly required. It is considered that, particularly with the introduction of policy that supports more intensive forms of development and tall buildings, this could risk development of environments that are not conducive to positive health and well-being of future occupants. However, under Option 2, the policy requires proposals to include both private outdoor space and accord with nationally described space standards, except in particular circumstances.

Option 2 would ensure that the preferred Development Strategy and policy approach sought elsewhere in the Draft Local Plan (including in relation to minimum net residential densities by area) would be delivered with greater respect to liveability for future and neighbouring occupiers; therefore, it comprises BCC's Selected Approach.

Selected Approach for DC2 Policy - Option 2

As the Draft Local Plan objectives include Urban Living principles of intensification and effective use of land, and policies that introduce minimum residential densities for different urban contexts, there is a clear need to introduce a specific policy that supports the sustainable development of tall buildings and conservation of the urban environment. For this reason, Option 2 represents BCC's Selected Approach and will form part of the next iteration of the Local Plan.

Selected Approach for DC3 Policy - Option 2

By setting out additional requirements for design of development proposals with respect to local character including historic environment, above those contained within Retained Policies, this Option performs more strongly than the current situation in terms of sustainability effects across the SA Objectives. It is therefore BCC's Selected Approach and will form part of the next iteration of the Local Plan.

Grouped Policy Theme Recommendations

- To promote collaborative, integrated design, it is recommended that a detailed Design Code / Guide or Framework that builds on the draft Design and Conservation Policies and Urban Living SPD is prepared for each Area of Growth and Regeneration, with local community engagement. These should be informed by the ten characteristics of good places set out in the National

Design Guide. It is recommended that these are signposted appropriately within this policy set and referenced in the Development Strategy.

- Update draft policies with any relevant information and objectives derived from the final national Building Safety Bill and the Social Housing White Paper 2020.
- It is recommended that Conservation Area Character Appraisals and the City Centre Context Study are updated to inform the baseline required for assessment of impacts.

Draft Policy DC1: Liveability in residential development including space standards

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to liveability including space standards within the Local Plan								
			Assessment of Significance of Effect (0/+/- / ?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Short	Med	Long						
Population, Housing and Communities	1.To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	+/?	+/?	+/?	D	P	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	AM: Consider methods for extending requirements for Prior Approval applications for Permitted Development Right for residential MB: Reference to flexibility in space standards for community-led or co-housing developments, where required. AM: Reference sustainable locations for intensive development (Draft Policy UL1); or a hierarchy of suitable development locations.	
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	+/?	+/?	+/?	D	P	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.		
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	D	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	CR: Retained and draft policies relating to high-quality design. AM: Provide minimum liveability standards for short-term occupancy / identified occupier groups. CR: Health and Wellbeing policies, to include the liveability of environment in terms of air quality, healthy food and open space access. CR: Retained policies / Urban Living SPD for design of new buildings, including solar orientation, privacy and outlook. MB/CR: Include space requirements / no. occupants for private outdoor space (as set by Urban Living SPD); and communal space. MB: Consider reference/inclusion of Active Design guidance provided by Sport England for the design of inclusive private outdoor communal space.	
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	+/?	+/?	+/?	D	Both	Local and City-wide.	R: Public health. AG: Bristol's population.		
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a
	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a
Economy and Employment	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	P	Local and City-wide.	R: Cultural heritage; built environment; AG: Bristol's population.	n/a	
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	Both	Local and City-wide.	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	n/a	
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+/?	+/?	+/?	D	Both	Local and City-wide.	As above.	MB: Inclusion of multi-functional GI within design requirements of private outdoor space. MB/CR: Include space requirements by occupants for private outdoor space (as set by Urban Living SPD); and communal space.	
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
	14. To maintain and improve the existing highway network	DMC30 DMC31	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	CR: Flood risk and water management policies. MB: Include reference to adapting internal and external spaces within residential development to climate change, particularly for vulnerable users such as the older people and young children, as this would encourage inclusive, liveable and resilient design	
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	n/a – issues dealt with via other DM policies (such as CCS3).	
	17. Minimise air and noise pollution	DMC38	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: Draft policy in relation to air quality (HW2).	
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Draft policy that addresses adaptation to climate change for vulnerable groups.	

Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would require residential development proposals to have regard to nationally described internal space standards and to make specific provision for private outdoor space. This option is neutral with regards to alternative methods of housing delivery, mix and type, however, it specifies difference in flexibility for internal space requirements for development intended to be for temporary or short-term occupation. This option would not include development undertaken by permitted development (PD) rights.</p> <p>Scale of effects: The scale of effects would be at the site and building level, however, would also have local and city-wide cumulative effects where adopted within new residential development across the city.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • Against SA Objective 1, this policy Option could provide minor positive benefit to the delivery of housing that does not cause harm to existing communities and a mix of types of housing. However, introduction of internal space standards and the requirement for private amenity space may also impact viability, which may indirectly have implications for capacity and delivery of permanent affordable housing units in particular. Nevertheless, the policy option maintains flexibility for specialist forms of accommodation and therefore would not undermine the principle of such development or its viability. Overall, much of the decision-making criteria for this Objective are not directly applicable to this policy option (including delivery of affordable housing); therefore, the effects of this option are predominantly unknown. • By requiring residential development proposals to develop land to optimum density in line with Draft Policy UL2, this option promotes effective use of land and could therefore bring minor positive effects for SA Objective 1 and 2, both in terms of increasing housing supply and delivering optimal density. As it remains unclear the extent to which this policy would direct residential development towards more sustainable locations and discourage development on greenfield sites, effects are partly unknown against SA Objective 2. • This policy option would set higher standards for new residential development and therefore contribute to improvement in the built environment for future occupants, where this is sited within areas of deprivation. This option could have minor positive, but uncertain, effects against SA Objective 5. • On balance, against SA Objective 6, this policy option could deliver minor positive benefits for health and wellbeing, by ensuring requirements for nationally described space standards are met and prescribing standards for private outdoor space. Through reference to play space and communal outdoor space, this draft option makes provision to alleviate some of the effects that tall buildings and densification can indirectly have on older people and young children. However, for residential development of temporary or short-term occupation, effects for health and wellbeing are more uncertain and potentially negative; whilst general design principles are set out in retained and draft policies, this policy option includes greater flexibility for internal space requirements for this type of development. In addition, liveability standards will not apply to development approved under permitted development rights – so beneficial effects of this policy option will be limited to schemes where planning permission is required. • The effects of this option against SA Objectives 10 and 11 are considered to be unknown. Whilst this policy does not directly influence the conservation and enhancement of the historic and/or natural environment, proposals for new development may have effects on the historic and/or natural environment if internal configurations do not sympathetically respond to either: listed features at a building level (i.e. internal alterations); the historic and/or landscape character or setting; or, account for biological or geological value. Whilst retained policies are in place to minimise impacts on sensitive ecological or historical receptors (i.e. BCS22, DM31, BCS9 and DM19), the effects are unknown and are dependent on implementation. • By requiring development of permanent, long-term occupation to include private outdoor space such as communal gardens, this option could generate minor positive effects for the provision of green infrastructure. However, as the quantum and design of such space is not directly specified within the policy requirements, the effects of against SA Objective 12 are majority unknown. • Effects of this option for SA Objective 15 are unknown as they remain dependent on the level of flood risk affecting the site and surrounds; flood risk projections based on the latest future climate change scenarios; and the design of development and outdoor space. It is assumed that site selection for development proposals would follow the Sequential Test to direct development away from areas of highest flood risk, which would be guided by retained policies BSC16 and BCAP5. • Against SA Objectives 16 and 18, effects of this option are also unknown, as development proposals may enable opportunities to maximise site-level adaptations, for example through providing comfortable external spaces in hot weather. However, this is linked to the intensification of land use / development and the design of development, and the extent to which other mitigation measures (enabled through Policy CCS2) are enabled. Whilst this policy supports the principle of high-quality design through reference to retained and draft policies, the standard of sustainable design, energy efficiency and construction are unknown; and may not be consistently applied across a site or building level due to factors such as viability or site constraints. • As with the assessment of other urban living principles, overall effects are unknown and dependent upon the level of accessibility by active travel (i.e. walking and cycling) and public transport options, alongside other design considerations. However, this option could generate minor negative indirect effects for air quality (SA Objective 17) through construction and operation stages, dependent upon the scale of development proposed and the siting of development.
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Draft Policy DC2: Tall buildings

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 Introduce new draft policy in relation to tall buildings						Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)	
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect		Receptors (R) and/or affected groups (AGs)
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	+/?	+/?	+/?	D	P	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	AM/MB: Set out within policy that a mix of type and tenure ownership models will be expected within residential development.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	+/?	+/?	+/?	D	P	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	n/a – addressed by Draft Policy UL1 and UL2.
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	+/?	I	P	Local	R: Bristol's local economy; Bristol's transport network; AG: Local services; Bristol's population.	n/a
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	D	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	CR: Retained and draft policies relating to high-quality design.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	?	?	?	D	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	CR: Health and Wellbeing policies, to include the liveability of immediate environment and impact of density on wellbeing. CR: Set out clear requirements for open space provision appropriate for needs of future and existing occupants, based on any future GI strategy. AM: Provide additional guidance on what is meant by 'excessive shadowing'.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	?	?	?	I	P	Local and City-wide.	R: Bristol's local economy; AG: Bristol's population; educational facilities.	n/a
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	D	P	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	n/a
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	I	Both	Local and City-wide.	As above.	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	D	P	Local and City-wide.	R: Cultural heritage; built environment; AG: Bristol's population.	AM: Provide guidance on what is meant by 'inappropriate visual impacts over a wider area'. MB: Provide additional evidence and guidance on key views and vistas, specifying maximum heights for sensitive locations, design principles for enhancing the historic environment. CR: Reference exemplar designs or designs which represent 'positive features in the urban environment' that accord with Urban Living principles, as set out within the Urban Living SPD.
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	Both	Local and City-wide.	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM/MB: Provision of biodiversity net gain in line with proposed policies and any GI guidance.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	I	Both	Local and City-wide.	As above.	n/a
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	n/a
	14. To maintain and improve the existing highway network	DMC30 DMC31	?	?	?	I	Both	Local; City-wide; Trans-boundary.	As above, plus R: Bristol's highway network.	n/a
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	CR: Retained policies for flood risk and water management.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	CR: Climate change and health and well-being policies.
	17. Minimise air and noise pollution	DMC38	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: As above.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: As above.

Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would set out specific policy guidance in relation to development of tall buildings within locations identified for more intensive forms of development. The Option would include overarching requirements for design proposals to not have harmful impacts on the urban environment and skyline. Under this Option, proposals would be required to adhere to the guidance set by the Urban Living SPD.</p> <p>Scale of effects: Effects would be most attributable to sites where development in excess of 30 metres (equivalent to 10 storeys) is proposed, which are limited to the locations set by Draft Policy UL2 for more intensive forms of development. Given the nature of tall building development, effects would also encompass both immediate site surrounds, and radial effects for vistas and local skyline. Depending on proximity to existing tall buildings, visibility and propensity for such development, this option could create cumulative city-wide effects.</p> <p>Social, economic and environmental effects: This policy option is considered to generate similar effects to Draft Policy UL1, as this acts as a linked ‘parent policy’ which would guide the locations for more intensive forms of development, including tall buildings. Effects are summarised as follows:</p> <ul style="list-style-type: none"> • This policy option could generate minor positive effects for SA Objective 1 through promoting Urban Living principles as a means to achieving a higher quantum of housing across the Plan Area. However, effects against this SA Objective are also partly unknown, particularly for delivery of affordable housing, a mix of housing types or methods of delivery. • As this Option effectively implements Urban Living principles within more intensive areas for development, tall buildings could enable greater numbers of homes and jobs to be located within easy walking distance of major transport routes, corridors and local centres. This Option is therefore likely to have positive, although uncertain, effects for SA Objectives 3 and Objective 9. In relation to Objective 9, there are effects in terms of their viability, where residential and commercial development could generate footfall and multiplier effects for the local economy to support existing or proposed retail development; and vitality, where mixed use development includes additional retail spaces that would seek to diversify existing centres. However, effects of this option are also unknown as they are based on implementation. • As this policy would include a requirement for development to deliver tall buildings that would contribute positively to the character and function of the urban environment, it is reasonable to consider that this option could generate direct minor positive effects for SA Objective 5. This option could support improvements to the built environment within Areas of Growth and Regeneration as well as town and district centres located in deprived areas. Tall buildings can also enable the benefits of density to occur (reduced transport time, efficiencies of scale and reduced land take) which can create multiplier effects for additional investment. However, effects are also unknown as the extent to which the built environment is improved is dependent upon the design of development delivered, which relies upon compliance with other relevant design policies. • Similar to effects of Draft Policy UL1, by directing development towards locations considered most sustainable (i.e. well-connected to sustainable modes of transport and/or ‘walkable’ from the City Centre), the air quality baseline and therefore health outcomes may improve compared to the absence of such policy within the Local Plan (Objective 6). However, effects of this option are considered unknown overall, being dependent upon factors such as existing environmental quality, quality of overall design and walkability to services, and alongside access to appropriate daylighting for wellbeing, and size of properties, with single-unit properties and limited indoor communal spaces potentially fostering social isolation. • As this Option effectively implements Urban Living principles within more intensive areas for development, tall buildings could enable greater numbers of homes and jobs to be located within easy walking distance of major transport routes, corridors and local centres. This Option may therefore have positive effects for Objective 7 DMC16; however, this also depends on the locations of schools. At a site-specific level, major development could enable indirect local improvements to and/or provision of new community or education facilities via s106 or CIL funding, however this would vary on a site by site and contextual basis, so effects of this option for SA Objectives 7 DMC15 are unknown. • Similar to effects for SA Objective 1, this option could create minor positive effects for SA Objective 8 where Urban Living principles support development of mixed uses, such as workspace, within tall buildings. By directing tall buildings towards more sustainable locations it is also possible that the benefits of density are realised through a reduced need to travel for employment opportunities. However, the extent to which this policy would enable mixed-use development is uncertain, and therefore its effects cannot be identified in absolute terms. • Proposals for new development of tall buildings may have effects on the historic environment if these do not conserve, enhance or respond to the historic and/or landscape character or setting. At a local level, by requiring development proposals to contribute to the character of the urban environment and not cause harmful visual impact for the setting of heritage assets, this policy option could create neutral effects for the protection of the historic built environment (SA Objective 10). At a city-wide level, tall-buildings are encouraged to create a positive feature in the urban environment from near and distant viewpoints – however, the impact overall at this scale is likely to be a change in the current townscape baseline, the effects of which are generally uncertain and subject to implementation. • Whilst this policy option may enable development to take place that could deliver biodiversity net gain benefits (through other policy requirements) (Objective 11), these effects will be uncertain and subject to site-specific design. • Tall buildings within more sustainable locations could, indirectly, increase the number of homes within walking distance of local centres and public transport routes and thereby reduce the need to travel by private car (DMC28 and DMC30). However, as policy does not directly seek to improve access to sustainable transport modes or support delivery of new transport infrastructure (DMC30 and DMC31), and transport improvements via s106 or CIL funding would vary on a site by site basis, effects of this option are also unknown. • Effects of this option for SA Objective 15 are unknown as they remain dependent on the level of flood risk experienced at the site and surrounds. It is assumed that site selection and layout of development proposals would follow the Sequential Test to direct development away from areas of highest flood risk, which would be guided by retained policies BCS16 and BCAP5. • Against SA Objectives 16 and 18, effects of this option are unknown, as development proposals may have impacts on local and/or city-wide water resources, however, this is linked to the intensification of land use, the type and design of development, and the resilience of water supply across the Plan period. Whilst this policy supports the principle of high-quality design, the standard of sustainable design, energy efficiency and construction are unknown as it is directed by other draft policies; and may not be consistently applied across a site or building level due to factors such as viability or site constraints. • This option could generate minor negative indirect effects for air quality (SA Objective 17) through construction and operation stages. However, overall effects of this policy option are unknown and dependent upon the end use and level of accessibility by active travel (i.e. walking and cycling) and sustainable public transport, alongside site-specific and design considerations. Tall buildings may have elevated localised impacts where they cause turbulent air flows and affect air pollution dispersal. It is considered potential negative effects could be sufficiently mitigated where this option is introduced in combination with proposed Health and Well-being Policies and Climate Change and Sustainability Policies.
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Draft Policy DC3: Local Character and Distinctiveness

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to local character and distinctiveness							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/- / ?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	0/?	0/?	0/?	I	P	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	n/a
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	0/?	0/?	0/?	I	P	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	n/a
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	D	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	MB: Specific opportunities for regeneration and investment to improve character within areas of deprivation.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	+/?	+/?	+/?	D	Both	Local and City-wide.	R: Public health. AG: Bristol's population.	AM: Set out clear requirements for open space provision appropriate for needs of future and existing occupants, based on any future GI strategy. AM: Reference impact on public realm, including open space.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	++/?	++/?	++/?	D	P	Local and City-wide.	R: Cultural heritage; built environment; AG: Bristol's population.	AM: Height restrictions could be employed for Conservation Areas or other sensitive locations. These could be defined in 'zones'. MB: Consider additional requirements for development that relates or includes advertisements to account for local character.
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	Both	Local and City-wide.	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM: As above.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+/?	+/?	+/?	I	Both	Local and City-wide.	As above.	MB: Include requirement development to respond to and provide additional green and blue infrastructure assets. MB: Consider sequential layout and landforms on site, alongside maximising the multifunctional benefits of green infrastructure.
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	n/a
	14. To maintain and improve the existing highway network	DMC30 DMC31	+/?	+/?	+/?	I	Both	Local; City-wide; Trans-boundary.	As above, plus R: Bristol's highway network.	n/a
	15. To reduce the risk of flooding from all sources	DMC32 DMC33	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	CR: Retained policies for flood risk and water management. AM: Consider sequential layout and landforms on site, alongside maximising the multifunctional benefits of Green Infrastructure.
Climate, Energy and Waste	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	CR: Climate change and health and well-being policies.
	17. Minimise air and noise pollution	DMC38	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: As above.
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: As above.

Rank Score: 1 –In addition to Retained Policy BCS21, this option would include further requirements for proposals to contribute towards local character and distinctiveness through a number of design principles. Under this option, development will not be permitted where it would be harmful to local character and distinctiveness or where it would fail to improve the character and quality of the area and the way it functions.

Scale of effects: The scale of effects would be at the site and building level, however, this would also have local and city-wide cumulative effects where adopted within new development across the city.

Social, economic and environmental effects:

- By explaining that new development proposals which introduce new types of design, scale and form into its context would be appropriate, provided that there is no harmful impact on local character, this option could therefore support delivery of innovative residential development and generate positive effects for SA Objective 1 (DMC3). However, as harm to existing communities also encompasses more than physical character, and the policy does not address delivery of affordable housing, a mix of housing types or methods of delivery, it is considered that the majority of effects are unknown.
- It is considered that effects of this policy option are unknown for SA Objective 2, as the policy does not directly seek to promote efficient use of land, specify reuse of brownfield sites, or require development of higher density within sustainable locations. By requiring development proposals to respond to existing context, this policy option may indirectly support delivery of higher density development within sustainable locations, however as this is directed by other draft policies such effects are deemed unknown.
- This option could generate direct minor positive effects for SA Objective 5, as it could support improvements to the quality of development and the built environment within Areas of Growth and Regeneration as well as town and district centres located in deprived areas. However, effects are also unknown as the extent to which the built environment is improved is dependent upon the design of development delivered, which relies upon compliance with other relevant design policies.
- By requiring development proposals to create more functional areas which respond to existing green infrastructure assets alongside the function of public space, it is considered that this policy option could contribute to minor positive effects for wellbeing and healthy lifestyles. By requiring proposals not to cause adverse impacts to the character and appearance, safety or amenity of existing frontage development could also ensure that neighbouring amenity is safeguarded. In addition, by requiring proposals to respond to local patterns of movement and account for the function of streets and public spaces, this option could enable walking and cycling to become more attractive as routine methods of transport, to benefit public health. However, as much of the above are dependent upon the siting of development and constructed design, effects are also partly unknown.
- This policy option could create significant positive effects for the protection of the historic built environment (SA Objective 10), by requiring development proposals to respond appropriately to and incorporate historic assets and features; restore the local pattern of historic development of the area; preserve or enhance the setting of existing landmarks; and reflect architectural rhythms. Moreover, the policy option includes the presumption against development that would harm local character, which would also benefit protection of the city's historic environment. Effects are dependent on design proposals, site-specific considerations and the degree of mitigation proposed, so are therefore partly unknown.
- Whilst this policy option may enable development to take place that could deliver biodiversity net gain benefits (through other policy requirements) (Objective 11), these effects will be uncertain and subject to site-specific design.
- By requiring new development to respond to local character and function of public spaces, and incorporate existing green infrastructure, this option could ensure a degree of protection for such green spaces, to create minor positive effects for SA Objective 12. However, as the draft policy remains silent with regards to blue infrastructure it is also unclear how the implementation of this policy would affect these assets. As with SA Objectives 10-11, effects are dependent on design proposals, site-specific considerations and the degree of mitigation proposed and are therefore partly unknown.
- As referenced in appraisal against SA Objective 6 above, this option could support the delivery of well-designed development that improves access to and quality of sustainable transport modes (walking, cycling and public transport) and reinforces the hierarchy of streets. This could therefore generate minor positive indirect effects for SA Objective 13. As the policy does not directly seek to improve access to sustainable transport modes or support delivery of new transport infrastructure, and transport improvements via s106 or CIL funding would vary on a site by site basis, effects of this option are unknown.
- Effects of this option for SA Objective 15 are unknown as they remain dependent on the level of flood risk experienced at the site and surrounds. Consideration of existing landforms and sequential layouts may support sequential layout on sites to direct development away from areas of highest flood risk, which would be guided by retained policies BSC16 and BCAP5.
- Against SA Objectives 16 and 18, effects of this option are unknown, as development proposals may have impacts on local and/or city-wide water resources, however, this is linked to the intensification of land use, the type and design of development, and the resilience of water supply across the Plan period. Whilst this policy supports the principle of high-quality design, the standard of sustainable design, energy efficiency and construction are unknown as it is directed by other draft policies; and may not be consistently applied across a site or building level due to factors such as viability or site constraints.
- Overall effects of this policy option against SA Objective 17 are unknown and dependent upon the end use and level of accessibility by active travel (i.e. walking and cycling) and sustainable public transport, alongside site-specific and design considerations. It is considered potential negative effects could be sufficiently mitigated where this option is introduced in combination with proposed Health and Well-being Policies and Climate Change and Sustainability Policies.

Draft Policies HW1 – HW3: Assessing the Effects of Health and Wellbeing Policies

Health and Well-being

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

Based on the SA Scoping Report 2018 and Update Note 2020, key current sustainability issues are identified as:

- Whilst broadly comparable to other Core Cities¹⁵⁰, there remains a persistent gap in the life expectancy between the most and least deprived areas of the city, with wards in the south and east generally experiencing the lowest life expectancies¹⁵¹;
- Bristol's average overall healthy life expectancy¹⁵² is lower than the national average¹⁵³;
- Increased poor mental health and wellbeing levels¹⁵⁴ which is particularly prevalent in deprived areas with higher rates of depression in Bristol North and West (outer);
- Relatively high rates of obesity and proportions of the population classified as 'overweight' in the city;
- 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;
- In locations that exceed the NO₂ air quality objectives, over 80% of this pollution is shown to be from local traffic sources¹⁵⁵;
- The River Frome, Brislington Brook, Malago, River Trym and Colliter's Brook do not currently achieve 'Good' Ecological Status due to impacts from flood protection / land drainage schemes and development; and
- The Bristol Avon catchment has moderate to poor water quality linked to high phosphate levels, of which are linked to treated sewage discharges and overflows; and urban diffuse pollution.

Updated National Design Guidance, including the National Design Guide¹⁵⁶, and the National Model Design Code and Guidance Notes for Design Codes define well-designed places as healthy, amongst other characteristics, and demonstrate how these can be achieved in practice.

Policies under '*Health and Wellbeing*' of the Draft Local Plan are set out in The Lockleaze Area of Growth and Regeneration (GRA) is located within North Bristol, where the Draft Local Plan proposes

¹⁵⁰ Public Health England (2019). Public Health Outcomes Framework, July 2019.

¹⁵¹ Bristol Public Health Intelligence using ONS data (July 2019).

<https://www.bristol.gov.uk/documents/20182/3849453/JSNA+2019+-+Life+expectancy+%28Updated+Jul+19%29.pdf/8c56e9e7-4099-6812-4664-a17ebad2bf61>

¹⁵² Healthy life expectancy at birth describes the average number of years a person living in a specific area would expect to live in good health based on contemporary mortality rates and prevalence of self-reported good health.

¹⁵³ Bristol Joint Strategic Needs Assessment (2018). Healthy Life Expectancy in Bristol

<https://www.bristol.gov.uk/documents/20182/3099546/Healthy+Life+Expectancy+in+Bristol+%282018%29.pdf/8514bab3-bb5f-ca20-152d-ed2897608a2d#:~:text=In%20Bristol%20the%20average%20healthy%20life%20expectancy%20at%20birth%20is,and%2062.9%20years%20for%20females.>

¹⁵⁴ JSNA (2018) <https://www.bristol.gov.uk/documents/20182/34748/JSNA+2018+Data+Profile.pdf/f931b437-84fc-699a-639f-89dde144b142>

¹⁵⁵ 2019 Air Quality Annual Status Report (ASR)

<https://www.bristol.gov.uk/documents/20182/32675/Bristol+City+Council+2019+Air+Quality+Annual+Status+Report+ASR.pdf/62eeb142-ac59-ac08-148b-a1247e08b1db>

¹⁵⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957233/National_Design_Guide.pdf

a minimum of 6,000 new homes across the entire area in accordance with the Development Strategy. The area has experienced significant regeneration in recent years, including public realm improvements at Gainsborough Square and infill development on several small sites owned by BCC. It is considered that the existing dwelling density of Lockleaze is low, compared with other areas of the city, resulting in a limited population to support the existing centre at Gainsborough Square and public transport services.

Key baseline and sustainability issues associated with the GRA are defined as follows:

- The GRA is located within an area of high deprivation and is an area that has a high proportion of working-age population who are involuntarily unemployed.
- The area is not within an AQMA or cumulative impact zone.
- Almost one fifth of the GRA is made up of land that is currently designated as Important Open Space (including Rowlandson Gardens, Gainsborough Square, Ashley Down Allotments and Railway Land, Lockleaze Primary School, Dovercourt Road Allotments and Dovercourt Road Open Space). The vast majority of these are proposed to be retained as Reserved Open Spaces or Local Green Spaces within the Local Plan Review.
- The Morris Road Railway Cutting and Bonnington Walk SNCI are located within the GRA. The GRA overlaps with several wildlife corridors, including the Bonnington Walk Open Space, Railway Land areas, Lockleaze School playing field, Land around Dovercourt Depot, Land rear of Downman Road and Dovercourt Road Allotments and Open Space (amongst others).
- A small percentage of the site (approximately 3%) to the north of the site is located within the Stapleton and Frome Valley Conservation Area, and the GRA is bounded at the south by the Grade II Stoke Park Registered Park and Garden in the south west. There are no listed features within the GRA site boundary.
- The area is not well-connected to existing communities in south and west Bristol.
- Approximately 1% of the GRA is currently allotment land (Dovercourt Road Allotments).

The GRA boundary includes land within approximately 1% of Flood Risk Zone 3b and 2% within Flood Risk Zone 2.. The grouped policies under this theme seek to directly meet the requirements of the following Local Plan Objective to *'Tackle the challenges of air quality, obesity and environmental quality'*, amongst others. The Draft Local Plan makes it clear that the rationale for the introduction of new health and wellbeing policies are broadly as follows:

- Support health, social and cultural wellbeing and the creation of healthy and inclusive communities through the planning system;
- Deliver a safe and healthy city by addressing issues of air quality, pollution, water quality, land contamination, and the effects of land uses such as fast food outlets; and
- Contribute to the improvement of the condition of water bodies within the Local Authority area to work towards 'Good Ecological Status'.

In the Draft Local Plan, new proposed policies contain additional requirements to account for any potentially polluting impacts on the environment which may arise from new developments and to minimise exposure of any development that is sensitive to pollution. New policies are required to respond to provisions set out in the revised NPPF with regards to the 'agent of change' principle

(paragraph 182); updated PPG in respect of water quality and supply¹⁵⁷; and Water Framework Directive (WFD) objectives set by the Severn River Basin Management Plan (SRBMP) (2015).

The current situation is informed by proposals to retain Policies DM34 and DM35, which set the Local Plan’s approach to contaminated land and noise mitigation; alongside Retained Policy DM14, which focuses on the health impacts of development. These retained policies would inform the implementation of Draft Policies HW1, HW2 and HW3.

Table 10 Relationship with other relevant plans and programmes

Draft Policy	NPPF	Other legislation	Retained Policies	Evidence
Draft Policy HW1: Pollution Control and Water Quality	Paras 8, 170, 178-183.	The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.	<ul style="list-style-type: none"> Retained Policy DM10: Food and drink uses and the evening economy Retained Policy BCS16: Flood Risk and Water Management 	Severn River Basin Management Plan (2015)
Draft Policy HW2: Air Quality	Paras 8, 103, 181. Glossary definition of AQMAs.	UK air quality framework (including domestic, EU and international law) ¹⁶⁰ including: <ul style="list-style-type: none"> The 2008 Ambient Air Quality Directive. The Air Quality (England) Regulations 2000. 	<ul style="list-style-type: none"> Retained Policy DM14: The health impacts of development Retained Policy DM23: Transport development management Retained Policy DM34: Contaminated land 	Air quality annual strategy (2019) ¹⁵⁸ 2019 Air Quality Annual Status Report (ASR) ¹⁵⁹ BCC Topic Paper – Takeaways
Draft Policy HW3: Takeaways	Paras 8, 91, 117.	n/a	<ul style="list-style-type: none"> Retained Policy DM35: Noise Mitigation 	

Stage 2: Identify and describe realistic alternatives

Noting that the ‘current situation’ has changed since adoption of the current Local Plan, including through the revised NPPF and PPG, there is an evidenced need to introduce new policies relating to matters of pollution control, water quality, air quality, and public health.

“Policy off” alternatives, which would result in a reliance upon existing adopted Core Strategy / SADMP policy approaches (detailed within Policy BCS16 of the Core Strategy and Policies DM10, DM14, DM23, DM34 and DM35 of the SADMP), are generally not considered to be reasonable alternative policy options in this instance, and are not subject to assessment against the SA Framework.

In light of the above, alternatives considered for each of the draft policies under the ‘Health and Wellbeing’ Policy Theme are set out below.

Draft Policy HW1: Pollution Control and Water Quality

Option 1 No new policy in relation to pollution control and water quality within the new Local Plan

¹⁵⁷ Paragraph: 002 Reference ID: 34-002-20140306.

¹⁵⁸ <https://www.bristol.gov.uk/documents/20182/32675/Bristol+City+Council+2019+Air+Quality+Annual+Status+Report+ASR.pdf/62eeb142-ac59-ac08-148b-a1247e08b1db>

¹⁵⁹ <https://www.bristol.gov.uk/documents/20182/32675/Bristol+City+Council+2019+Air+Quality+Annual+Status+Report+ASR.pdf/62eeb142-ac59-ac08-148b-a1247e08b1db>

¹⁶⁰

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/791025/air-quality-napcp-march2019.pdf

Given the change to the current situation, including the need to address additional elements of national policies within this theme, a ‘no new policy’ option is not considered a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to pollution control and water quality within the new Local Plan

This option would involve the introduction of new policy (‘March 2019 Consultation Option’) regarding pollution control and water quality in new development, and would supersede existing Policy DM33 of the SADMP and Policy BCS23 of the Core Strategy. This option would also include supporting policy text for the ‘agent of change’ principle in alignment with the NPPF, which places the onus upon developers to ensure developments proposed adjacent to existing noise generating uses protects the new occupiers from noise impacts, so that the existing uses are not threatened.

Under this option, new development adjacent to underground or surface water bodies is expected to contribute towards ‘maintaining or achieving Good Ecological Status’ against the WFD. Measures will be sought from development adjacent to waterways covered by the WFD.

The environmental objectives of the WFD are to prevent the deterioration of the status of surface waters and groundwaters, whilst aiming to achieve objectives and both good ecological potential and surface water chemical status. Avon Bristol catchment data indicates that whilst that surface water catchments are generally achieving ‘Good Chemical Status’¹⁶¹, 2016 data indicates there were no surface water catchments achieving ‘Good Ecological Status’¹⁶²; this is due to excessive nutrient pollution and sediment leaching, degraded ecological habitats and flooding and flow issues. Objectives within the Severn River Basin Management Plan (SRBMP) (2015) require all surface water bodies to achieve a ‘Good Ecological Status’ with a deadline that has been extended to 2027¹⁶³.

This option would therefore broadly align with objectives in the Government’s 25 Year Environment Plan and objectives to reach or exceed objectives for specially protected water bodies as per River Basin Management Plans 164.

Reasonable Alternative	Yes
Rationale	By ensuring that potentially polluting development is supported by an appropriate scheme of mitigation and refused where this is not provided; alongside introduction of ‘agent of change’ supporting policy text, this approach would be compliant with the requirements of the NPPF and PPG. In relation to water quality, through reference to achieving ‘Good Ecological Status’, this option would also align with Government’s 25 Year Environment Plan and PPG.
Recommendations for Evidence Update	Refresh evidence used to support retained policies in relation to water management (Policy BCS16), including an Updated Severn River Basin Management Plan, and Severn River Basin Flood Risk Management Plan. Consider updated supplementary guidance on SuDS, including role for improving water quality via pollutant removal.

¹⁶¹ <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3046/Summary>

¹⁶² <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3046/Summary>

¹⁶³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718336/Severn_RBD_Part_1_river_basin_management_plan.pdf

¹⁶⁴ Paragraph: 002 Reference ID: 34-002-20140306.

Draft Policy HW2: Air Quality

Option 1 No new policy in relation to air quality within the Local Plan

Given the change to the current situation, including the need to address additional elements of national policies within this policy theme, a ‘no new policy’ option is not considered a reasonable alternative for the Local Plan Review.

Option 2 Introduce new policy in relation to air quality within the Local Plan

This option would include new policy (‘March 2019 Consultation Option’) that is based on three requirements:

- Development with potential for significant trip generation to provide appropriate sustainable transport improvements, consistent with other draft and retained policies (including Policy DM23 of the SADMP).
- Presumption against development that includes potential for significant local emissions that would detriment air quality. Such development will be expected to provide an appropriate scheme of mitigation and will not be permitted unless it considered essential for economic or wider social need.
- Development in AQMAs should take account of existing levels of air pollution and include measures to mitigate its impact on future occupiers.

Reasonable Alternative	Yes
Rationale	This option would be compliant with the NPPF requirements to address air quality within new development including through management of patterns of growth and by directly responding to local air quality issues within existing AQMAs.
Recommendations for Evidence Update	Refresh evidence base underpinning existing AQMAs; and a local Air Quality Action Plan (AQAP). Refresh information in relation to detailed Air Quality Assessments for development management, in line with updated PPG165.

In addition, good practice examples have also reviewed whether there is a case for ‘air quality neutral’ policies

Case study references: London Borough of Camden (2016) – Air Quality Neutral Policy alternatives¹⁶⁶ or the introduction of development tariffs linked to air quality. As the March 2019 Consultation Options pre-date these initiatives, it is expected that next iteration of the Local Plan (and subsequent SA Report) will explore whether these are indeed reasonable alternatives.

Draft Policy HW3: Takeaways

Option 1 No new policy in relation to takeaways within the Local Plan

This option is effectively the “policy off” alternative, which would result in a reliance upon the existing adopted Core Strategy / SADMP policy approaches only for development management of food and drink uses (detailed within Policy DM10 of the SADMP). Given the identified key sustainability issues of obesity and inequalities in poor physical health across the city, it is considered

¹⁶⁵ Paragraph: 007 Reference ID: 32-007-20191101

¹⁶⁶ <https://www.camden.gov.uk/documents/20142/16025899/CD2.21+Sustainability+Appraisal+-+Full+report.pdf/57dc4f4b-301c-5f51-5157-ccbe85432f4c>

that there is an evidenced need to introduce policy in respect of takeaways in alignment with requirements of the Local Plan to positively contribute towards healthy lifestyles through the planning system (Paragraphs 8, 91, 117 of the NPPF).

Option 2 Introduce new policy in relation to takeaways within the Local Plan

This option would expand the approach taken in existing Policy DM10 by introducing a specific policy ('March 2019 Consultation Option') on the health impacts of takeaway development. This option would restrict takeaways in locations close to schools or where young people gather and prevent clustering of takeaway uses within retail centres. The option would introduce stronger policy mechanisms to prevent harmful concentrations and clustering of proposals for Sui Generis Use Class or mixed Use Class E(c) and Sui Generis premises.

This option would therefore align with updated PPG in relation to healthy food environments, which sets out that planning policies¹⁶⁷ can seek to limit the proliferation of particular uses where evidence demonstrates this is appropriate. This option would also seek to respond to PPG¹⁶⁸ amended definition of what constitutes a 'healthy place'¹⁶⁹ supported by the National Design Guide and new guidance in relation to estate regeneration.

Reasonable Alternative	Yes
Rationale	The policy aligns with and supports national public health and updated planning policy (NPPF and PPG) that seeks to ensure communities live in an environment which enables and promotes healthier lifestyles.
Recommendations for Evidence Update	Update evidence to support retained policy DM10 / BCC Topic Paper in relation to Takeaway Policy, including thresholds used and key definitions (such as 'youth facilities').

Other alternatives could consider different distances (400m or 800m) and thresholds for concentrations of uses within centres. Evidence will be needed to justify these thresholds before testing of reasonable alternatives is undertaken.

Stage 3: Assessment and evaluation of effects

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

- A Bristol Air Quality Action Plan (AQAP) is currently in preparation, which will provide the mechanism by which BCC, in collaboration with national agencies and others, will state their intentions for working towards the air quality objectives. As such, identification of alternatives in relation to Policy HW2 will be required to account for any relevant measures to address poor air quality through the Local Plan.
- The Draft Local Plan March 2019 version was published and consulted upon in advance of a background Topic Paper in relation to takeaways and hot food establishments, and therefore

¹⁶⁷ Paragraph: 004 Reference ID:53-004-20190722

¹⁶⁸ Paragraph: 003 Reference ID:53-003-20191101

¹⁶⁹ 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)

reasonable alternatives for Draft Policy HW3 will be required to reflect any policy recommendations made in response to updated evidence.

- While the proposed introduction of a Clean Air Zone (CAZ) within Bristol is relevant to the environmental baseline for the implementation of Policy HW2, it is considered that CAZs are more directly linked to sustainable transport. These are addressed in the transport policy options section above.

Summary of assessment findings

Selected Approach for HW1 Policy - Option 2

This draft policy option would maintain a comparable approach to existing adopted policy DM33, in relation to water quality and the requirement to maintain or achieve 'Good' Ecological Status against the WFD. However, it would introduce more clarity around the 'agent of change' principle for the purpose of development management. Overall, it is considered that this draft policy option would maximise opportunities for direct and indirect synergistic benefits across the Plan area when assessed against the SA Framework, particularly in combination with HW2 and draft Climate Change and Sustainability Policies. This draft policy option would ensure compliance with revised NPPF in relation to the 'agent of change' principle.

Selected Approach for HW2 Policy - Option 2

While similar to existing adopted policy DM33 in approach, this draft policy option would include specific policy provisions with regards to restricting development that would create undue local air quality impact and requiring appropriate schemes of mitigation are provided where such impacts exist. Importantly, this option also makes a more explicit link between air quality and the delivery of sustainable transport improvements to mitigate transport-related emissions.

Similar to HW1 Policy Option 2, this draft policy option maximises opportunities for direct and indirect benefits across the Plan area. Where potential minor negative effects are identified, appropriate mitigation could reduce the degree of these. In light of the key sustainability issues identified with regards to air quality, this draft policy option would deliver greater benefits for local air quality issues within and outside of AQMAs.

Selected Approach for HW3 Policy - Option 2

Policy Option 2 would provide more positive benefit to SA Objectives under the SEA theme 'Health and Well-being', through adding definition to what constitutes a 'harmful concentration' of Sui Generis takeaways, alongside other specific criteria. Under this Option, there would also be likely benefits for the sustainable balance of existing retail centres, directly contributing towards promoting vitality and/or diversity within such locations.

Grouped Policy Theme Recommendations

- While at a policy-making level Social Value is already integrated within the National Planning Policy Framework (NPPF), it is recommended that Social Value is referenced within the Bristol Local Plan, specifically the Health and Well-being Policy Chapter, so that the wider

community, health and social aspects of a development can be considered. It is recommended that this draws upon the Council's existing Social Value Policy¹⁷⁰.

- Based on research into the integration of social value into planning, it is recommended that a separate Social Value policy is developed that includes provisions for new development to follow, such as the inclusion of a Social Value Statement as a pre-requisite of the validation of major applications . This could also involve expanded SPD guidance.
- The Chapter could be expanded to include both social and cultural well-being, in recognition of the multi-dimensional aspects of well-being. In response to comments received at Regulation 18 Consultation, development of a separate outdoor advertising policy could be developed, recognising that public advertisement is potentially damaging to health and wellbeing due to harm on individual self-image, personal debt, and physical health (e.g. fast food advertising).

¹⁷⁰ <https://www.bristol.gov.uk/documents/20182/239382/Social+Value+Policy+-+approved+March+2016-1.pdf/391b817b-55fc-40c3-8ea2-d3dfb07cc2a0>

Draft Policy HW1 Pollution Control and Water Quality

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to pollution control and water quality within the new Local Plan							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Medi	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	0/?	0/?	0/?	I	Both	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: Add definition to 'areas of existing noise / pollution types' – e.g. point or diffuse sources and/or defined areas / buffer zones, to set out clear requirement for whether mitigation measures would be required through development management process.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	0/?	0/?	0/?	I	Both	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	n/a
	3. Ensure easy and affordable access to key services 4. Increase participation in cultural and community activities	DMC8 DMC9	n/a +/?	n/a +/?	n/a +/?	n/a I	n/a Both	n/a Local and City-wide.	n/a R: Cultural heritage, public health; AG: Bristol's population.	n/a MB: Set out good examples where the agent of change principle has successfully allowed for the integration of new development with existing noise-generating cultural or community facilities (para 182 of the NPPF) (i.e. through mixed-use developments and siting of development).
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Built environment. AG: Bristol's population.	MB: Ensure appropriate cross-references to retained and draft policies relating to high-quality design.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	+/?	+/?	+/?	D	Both	Local and City-wide	R: Public health. AG: Bristol's population.	MB: Reference benefits to health and well-being within the policy, including the role of agent of change to ensure good standard of living conditions.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	+/?	I	Both	Local and City-wide.	R: Bristol's local economy, AG: Local businesses, Bristol's population.	AM: Potential for introduction of development contributions / tariffs where employment development would create undue impact on the environment.
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	+	+	+	D	Both	Local; City-wide; Trans-boundary.	R: Local wildlife and biodiversity; natural environment; AG: Bristol's population; wildlife.	AM: Potential for introduction of development contributions / tariffs to prevent adverse effects on environment designations and receptors (e.g. eutrophication of water bodies). CR: Reference to retained and draft policies for GI.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	+	+	+	I	Both	Local; City-wide; Trans-boundary.	As above.	As above.
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	?	?	?	n/a	n/a	n/a	n/a	CR: Other retained and draft policies address the development of new transport schemes; however, this policy may indirectly influence the delivery of sustainable transport through a presumption against polluting forms of development.
	14. To maintain and improve the existing highway network	DMC30 DMC31	?	?	?	I	Both	Local and City-wide.	R: Public health; AG: Bristol's population.	CR: Retained and draft policies related to transport development management.
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	0	0	0	n/a	n/a	n/a	n/a	CR: Other retained policies address flood risk.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	+	+	+	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water); AG: Bristol's population; local wildlife.	CR: Draft climate change and design policies to outline opportunities to increase the standard of sustainable design and construction through minimising water resource use. AM: Development adjacent to underground or surface water bodies should be required to mitigate where harmful abstraction is proposed (25-Year Environment Plan; PPG). AM: Provide evidence of the effect of nitrate run-off on water quality in Bristol.
	17. Minimise air and noise pollution	DMC38	+/?	+/?	+/?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	AM: Include proportionate contributions to air quality improvements elsewhere as part of mitigation requirements (including those identified in air quality action plans and low emission strategies).
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+/?	+/?	+/?	I	Both	Local; City-wide; Trans-boundary.	R: Localised air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	CR: Draft climate change policies.

Evaluation of Effects	<p>Rank Score: 1 – This draft policy option would set out new requirements for development proposals considered to be potentially polluting in nature; and introduce the ‘agent of change’ principle consistent with the revised NPPF. This Policy Option would also rely upon provisions within existing development management policies to ensure that sensitive environments are protected from adverse levels of pollution; and community facilities are protected insofar as they are already viable and valuable.</p> <p>Scale of effects: The scale of effects would be predominantly localised and attributable to the individual site level and adjacent receptors (including existing noise generating premises within the city); however, would also create city-wide and transboundary effects through inclusion of guidance in relation to enhancing water quality.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This option would create uncertain, indirect effects for housing development where this is proposed adjacent to existing noise-generating development, as appropriate mitigation for ‘Agent of Change’ principles may impact overall scheme viability. The policy option would likely be neutral where proposed development is not within an area of existing noise or other types of pollution. • This option would create uncertain, indirect effects for maximising the reuse of land (SA Objective 2), as some of these locations may be more favourable for existing potentially polluting development. • Through inclusion of the ‘agent of change’ principle, this option could produce indirect minor positive effects against SA Objective 4 where existing noise-generating community uses (e.g. music venues) are protected by appropriate mitigation. However, the extent to which this results in increased participation in cultural or community-based activities is dependent on specific site considerations. • It was considered that, overall, these requirements would indirectly result in improvements in the built environment, and therefore quality of life, within deprived areas. However, as with Objective 1, it may be the case that appropriate mitigation for ‘Agent of Change’ principles may impact overall scheme viability which would affect the ability to improve the environment. • This option would also seek to protect future occupiers of new development located adjacent to existing noise-generating uses, and therefore is likely produce minor positive benefits for SA Objective 6 (particularly DMC13). Effects are partly uncertain, given well-being is not only based on the impact of the immediate built environment. • This option may have indirect minor positive effects for SA Objective 8, as indirectly requiring less polluting development may contribute towards the delivery of low or zero carbon emissions spaces. • This option would likely provide direct minor positive effects against SA Objectives 11, given the policy seeks to protect biological, geological and nationally or internationally designated nature conservation assets from adverse effects of potentially polluting development and poor air quality. • By introducing policy provisions that require development which would create undue impact on environmental amenity (including air quality), this option could have minor positive benefit for the natural environment and green infrastructure. The effects on Objective 13 and 14 are however unknown at this stage, although this option could have an indirect influence on the desirability to travel by active modes through generally better quality, local environments • This option would likely provide direct minor positive against SA Objective 16, as the draft policy seeks to directly improve water quality and achieve ‘Good Ecological Status’ against the requirements of the WFD and SRBMP. Given this would affect the wider river catchment area, this would also deliver transboundary effects; and could also support strategic flood risk management. • By requiring an appropriate scheme of mitigation for potentially polluting development, this option may increase resilience to the effects of climate change (via on or off-site mitigation for potentially polluting development; and by requiring development to contribute to WFD objectives). As climate change resilience is a product of several factors, including details of development and level of mitigation itself, effects are partly uncertain.
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Draft Policy HW2 Air Quality

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to air quality within the Local Plan							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/-/?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	0/?	0/?	?	D	Both	Local and City-wide.	R: Local housing market, Bristol's population; AG: Bristol's population.	MB: For development within AQMAs, it is suggested that examples of opportunities to improve or enhance existing air quality within AQMA areas are included within the supporting text. AM: Set out appropriate level of sustainable transport improvements and financial contribution.
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	0/?	0/?	?	D	Both	Local and City-wide.	As above, plus: R: Bristol's local economy; AG: Local businesses.	CR: As above, plus reference to Urban Living policies. AM: Mitigation for intensification in AQMAs, including localised air quality / down-draughting effects.
	3. Ensure easy and affordable access to key services	DMC8	+/?	+/?	?	I	Both	Local and City-wide.	R: Public health; Bristol's population; Bristol's local economy; AG: Local businesses.	MB/CR: Reference to role of sustainable transport developer contributions in improving accessibility to key services / community facilities.
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	+/?	+/?	?	Both	Both	Local and City-wide.	R: Public health; built environment; Bristol's population; Bristol's local economy; AG: Local businesses.	CR: Mitigation measures set out in Climate Change and Design and Conservation draft policies / retained policies, to encourage sustainable development within AQMAs.
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	+/?	+/?	?	D	Both	Local and City-wide.	R: Public health; built environment; air quality. Bristol's population; AG: Bristol's population; wildlife.	MB: Reference benefits to health and well-being of improving air quality within the policy. AM: Examples of opportunities to improve or enhance existing air quality within AQMA areas.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	+/?	+/?	?	I	Both	Local and City-wide.	R: Bristol's population; Bristol's local economy; AG: Local businesses.	CR: Delivery of educational facilities is addressed elsewhere in the Plan; however, developer contributions could provide gains for sustainable accessibility. MB/CR: Reference to role of sustainable transport developer contributions in improving accessibility to existing / proposed educational facilities.
	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	+/?	+/?	?	I	Both	Local and City-wide.	R: Bristol's population; Bristol's local economy; AG: Local businesses.	As above, applied to existing or proposed employment locations. MB/CR: Delivery of sustainable transport improvements in line with overall spatial strategy for employment.
Economy and Employment	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	?	I	Both	Local and City-wide.	R: Bristol's population; high-streets and retail centres; Bristol's local economy; AG: Local businesses.	CR: Delivery of educational facilities is addressed elsewhere in the Plan; however, developer contributions could provide gains for sustainable accessibility. MB/CR: Reference to role of sustainable transport developer contributions in improving accessibility to existing / proposed educational facilities.
	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	Both	Local and City-wide.	R: Built environment; cultural heritage.	AM: Reference to negative impacts of air pollution for the built environment including for heritage assets (e.g. corrosion issues). Suggest that sensitive assets or those on the Heritage at Risk register are included.
Townscape and Landscape	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Local wildlife and biodiversity; natural environment.; AG: Bristol's population; wildlife.	AM: Reference to mitigation of air quality (e.g. acidification) impacts in respect of the natural environment, including for sensitive species and habitats.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	I	Both	Local; City-wide; Trans-boundary.	R: Local wildlife and biodiversity; natural environment.; AG: Bristol's population; wildlife.	AM: Include a list of opportunities within the policy to improve air quality or mitigate impacts, including through green infrastructure provision and enhancement.
	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	+/?	+/?	?	I	Both	Local and City-wide.		AM: Consider levy / tariff based on air quality impact of new development. CR: Reference to retained and draft policies for provision of sustainable transport schemes.
Transport	14. To maintain and improve the existing highway network	DMC30 DMC31	+	+	?	I	Both	Local; City-wide; Trans-boundary.		AM: Set out measures from Joint Local Transport Plan 4 in the Local Plan Review, including improving efficiency of freight movements; improvements to public transport and walking/cycling networks; and using mechanisms to discourage car use in central Bristol.
	15. To reduce the risk of flooding from all sources	DMC32 DMC33	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Climate, Energy and Waste	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	+/?	+/?	?	I	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	CR: Reference to the impact of air quality / diffuse pollution on water quality (e.g. acidification).
	17. Minimise air and noise pollution	DMC38	+	+	?	D	Both	Local; City-wide; Trans-boundary.	R: Air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	AM: Consider levy / tariff based on air quality impact of new development. AM: Reference Clean Air Zones or cross reference to policies relating to Clean Air Zones (NPPF Paragraph 181). MB: Consider the ability to minimise the impact of new development on air quality for both future occupiers and existing communities, alongside the built and natural environment. Under this point, there is a suggestion to address a regulated use of wood burning stoves in domestic properties.

	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change	DMC39 DMC40 DMC41 DMC42	+/?	+/?	?	I	Both	Local; City-wide; Trans-boundary.	As above.	CR: Integrate with draft climate change policies.
Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would introduce additional requirements in relation to air quality, including for development proposed within existing AQMAs. It would require impacts of new development that is likely to result in significant air quality impacts through additional trip generation to be accounted for through the provision of sustainable transport. This option would include the presumption against development that would produce significant local air quality impact, unless an exceptional case can be made to demonstrate its importance for economic or social reasons.</p> <p>Scale of effects: This option would produce effects that are predominantly localised (site and immediate surrounds), with potential for cumulative effects for city-wide and transboundary locations in relation to SA Objectives 11, 12, 14, 16 – 18.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none"> • This option could have an uncertain neutral effect on housing development and the ability to maximising use of previously developed land. In one sense, this may result in the displacement of residential uses to sites outside of AQMAs, or it might limit the ability to deliver residential schemes as a result of an impact on scheme viability. As the environmental baseline in relation to AQMAs is likely to change, particularly with the Air Quality Action Plan, effects against this objective are also uncertain in the medium to longer term. • By requiring development with potential for significant additional trip generation to provide contributions towards sustainable transport improvements, this option could have indirect minor positive effects by encouraging location of development in more sustainable locations and/or increase the accessibility of services. However, as this is also dependent on implementation, this is also uncertain in effect. • By requiring development with potential air quality impacts to be supported by sustainable transport improvements, this option would also likely create minor positive effects in the short-medium term for SA Objective 5, specifically DMC10, where enhancements are proposed in areas of deprivation. Given that areas of deprivation often correlate with existing AQMAs, this policy option could have direct minor positive benefits on improvement to the built environment in deprived areas. Potential benefits are dependent upon details such as the siting of future development and extent of mitigation, therefore effects are also unknown against this SA Objective. • This option would likely create direct minor positive effects for SA Objective 6, where the policy requires any new development in AQMAs to consider the level of existing air pollution and its impacts on future occupiers. However, this is subject to the extent of mitigation and dependent upon details including the design and siting of proposed development. This option could also cause indirect minor positive benefit for promoting active travel modes where financial contributions related to additional trip generation act as a ‘push’ mechanism for healthier modes of transport. • This option could create indirect minor positive effects for SA Objectives 3, 7 and 9 where development contributions for sustainable transport could increase accessibility and affordability of access to existing or proposed educational facilities and retail uses. This remains subject to the scale, siting and design of improvements; and would rely on assumptions that these would connect local / town centres / schools with places of need. • This policy option could create indirect minor positive effects for protection of the historic environment through provisions to restrict development likely to create significant local air quality impacts. Although this option would seek to safeguard future occupiers of development proposed within AQMAs, there is no direct reference to the impacts of air quality for existing heritage assets or the wider built environment, including the negative impacts of air pollution on structures via corrosion. Overall, the effects of this option against SA Objective 10 are unknown. • This policy option has the potential to create indirect minor positive effects for protection of biodiversity and geodiversity against SA Objective 12 where the draft policy contains a presumption against development that would create adverse local air quality impacts. • This option would create a significant positive effect against Objective 17 when assessed in the short and medium term on the basis that it would minimise exposure to pollution for future residents and offer the opportunity to address pollution arising from new development. However, because the policy text enables development with a specific local air quality impact where there is a wider economic or wider social need, the overall effect is not a significant positive. • For SA Objectives 16 and 18, this option could have minor indirect positive effects in relation to the specific issues of water quality and climate change resilience, and therefore create cumulative or synergistic effects when introduced in combination with Draft Policy HW1. However, the degree to which this positive effect could be realised is both subject to mitigation for development with potential for significant local emissions, and contingent on policies in relation to design and climate change. 									

Draft Policy HW3 Takeaways

SEA Theme	SA Framework Objective	D-M Criteria	Policy Option 2 - Introduce new policy in relation to takeaways within the Local Plan							Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB)
			Significance of Effect (0/+/- / ?)			Direct (D) or Indirect (I)	Temporary (T) or Permanent (P)	Spatial Scale of Effect	Receptors (R) and/or affected groups (AGs)	
			Short	Med	Long					
Population, Housing and Communities	1. To ensure an adequate and diverse supply of housing that is affordable to everyone	DMC1 DMC2 DMC3 DMC4	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	DMC5 DMC6 DMC7	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	3. Ensure easy and affordable access to key services	DMC8	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	4. Increase participation in cultural and community activities	DMC9	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	DMC10 DMC11	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	6. To reduce health inequalities and promote healthy lifestyles across the city	DMC12 DMC13 DMC14	+	+	+/?	D	Both	Local and City-wide.	R: Public health; built environment; air quality. Bristol's population; AG: Bristol's population; wildlife.	CR: Reference to role of other mutually supportive policies for achieving healthy lifestyles including access to open space / recreational opportunities. MB: Include a broader reference to the definition of 'healthy place', as set out in updated PPG (referenced above) and the National Design Guide ¹⁷¹ (Guidance under 'H1 Healthy, comfortable and safe internal and external environment'), either in supporting policy text or the policy. MB: Revise use class based on changes to use classes from 1 September 2020. MB: Define 'youth facilities or other locations where young people gather'.
	7. Ensure access to education and learning for all sections of society	DMC15 DMC16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Economy and Employment	8. To support the economy and ensure that there are suitable opportunities for employment	DMC17 DMC18 DMC19 DMC20 DMC21	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	9. Ensure access to a range of shopping facilities for all sections of society	DMC22 DMC23	+/?	+/?	+/?	D	Both	Local and City-wide.	R: Bristol's population; high-streets and retail centres; Bristol's local economy; AG: Local businesses.	CR/MB: Retained policies on shopping services and the evening economy.
Townscape and Landscape	10. To ensure the protection and enhancement of the historic environment and its setting	DMC24	?	?	?	I	Both	Local and City-wide.	R: Built environment; cultural heritage.	AM/CR: Reference to the need to ensure compliance with DM policies in relation to historic environment and its conservation.
	11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats	DMC25 DMC26	?	?	?	I	Both	Local and City-wide.	R: Local wildlife and biodiversity; natural environment.; AG: Bristol's population; wildlife.	AM/CR: Reference to the need to ensure compliance with DM policies in relation to the natural environment and its conservation.
	12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27	?	?	?	I	Both	Local and City-wide.	R: Local wildlife and biodiversity; natural environment.; AG: Bristol's population; wildlife.	As above.
Transport	13. To encourage a demonstrable modal shift and reduce the need to travel	DMC28 DMC29	-/?	-/?	-/?	I	Both	Local and City-wide.	R: Bristol's transport network; air quality; AG: Bristol's population.	n/a
	14. To maintain and improve the existing highway network	DMC30 DMC31	0	0	0	n/a	n/a	n/a	n/a	n/a
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources	DMC32 DMC33	0	0	0	n/a	n/a	n/a	n/a	As the Sequential Test would apply to development this is not likely create significant effects, except where proposed in Flood Zones 2 and 3. CR: Reference to flood risk issues and mitigation required for DM are addressed by retained policies.
	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled	DMC34 DMC35 DMC36 DMC37	-/?	-/?	-/?	D	Both	Local; City-wide; Trans-boundary.	R: Natural environment (water and land); AG: Bristol's population; local wildlife.	AM/CR: Include provisions in policy that directly address management of landfill waste produced by these Use Classes.
	17. Minimise air and noise pollution	DMC38	-/?	-/?	-/?	D	Both	Local; City-wide; Trans-boundary.	R: Air quality; biodiversity; public health; built environment; AG: Bristol's population; local wildlife.	AM/CR: Reference to DM policies for noise mitigation. Consider air quality effects of Scope 3 emissions via private car or delivery related to A3 or A5 Uses Classes (i.e. consumer travel).
	18. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural	DMC39 DMC40	?	?	?	Both	Both	Local and City-wide.	As above.	CR: Reference to development requirements under draft climate change policies.

¹⁷¹ MHCLG (2019). National Design Guide. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf

	environment and its communities can withstand the effects of climate change	DMC41 DMC42										
Evaluation of Effects	<p>Rank Score: 1 – This Policy Option would set out new and specific requirements for proposed development of takeaways where these are likely to directly influence the promotion of healthy lifestyles or increase behaviours that are harmful to public health. Alongside retained policies in relation to health impacts of development, this option would address development of new units within the A5 Use Class (now ‘Sui Generis’) and would be applicable to proposals for mixed Use Class A3 (now ‘Class E Commercial, Business and Service’) and A5 premises (now ‘Sui Generis’).</p> <p>Scale of effects: This option would create effects at the local level. It would also likely create cumulative impact at a city-wide level, as it would relate to multiple defined locations across the city.</p> <p>Social, economic and environmental effects: This option would have additional effects which provide clarity and specific level of protection of existing retail centres. Effects are considered as follows:</p> <ul style="list-style-type: none"> • This option would likely create direct minor positive effects for SA Objective 6 as the draft policy seeks to restrict harmful concentrations of A5 Use Class (now ‘Sui Generis’) or mixed Use Class A3 (now ‘Class E Commercial, Business and Service’) and A5 premises (now ‘Sui Generis’), and includes criteria to define such concentration. It is considered that this option would benefit public health through both limiting the proliferation and/or clustering of takeaways; and by instead positively favouring those that would promote healthy lifestyles. The effects of this option in the longer time remain unknown due to uncertainty around the public health baseline, however it is likely that this policy could have long-term benefits for people’s health. • By limiting harmful concentrations of takeaways within a retail centre (defined as a 10% concentration of the total number of units), this option would also likely create minor positive indirect effects for achieving diversity of uses within retail centres (SA Objective 9). • This option would create minor negative and unknown effects for SA Objectives 13 and 18. Whilst local centres may be well-served by public transport, resisting additional uses in local centres or within walking distances of schools may encourage driving or use of public transport for access to existing takeaways. • This option would likely create minor negative / unknown effects for SA Objective 16, where proposed development may increase landfill waste and demand on local resource consumption. It is considered that through reference to retained / draft policies, these effects could be mitigated. However, as this is partly dependent on the operation of other draft policies, effects are also unknown. • Similarly, this option would likely create minor negative / unknown effects for SA Objective 17, specifically with regards to noise pollution. However, this remains subject to the mitigation delivered in response to proposed development for A5 Use Class or mixed Use Class A3 (now ‘Class E Commercial, Business and Service’) and A5 premises (now ‘Sui Generis’). 											

