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BY EMAIL ONLY

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Dear Sir(s) / Madam(s)

Bristol Local Plan Examination - Natural England's Response to Inspectors' Questions Pertaining to Habitats Regulations Assessment

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We apologise sincerely for the delay in reviewing and responding to the Appropriate Assessment stage of the Habitats Regulations Assessment for Bristol's Local Plan.

We note the Inspectors' Documents IN4 provided on 11 December 2024, including the Draft Matters, Issues and Questions and the questions contained that pertain to Natural England's advice on the Habitats Regulations Assessment. For clarity, we have used those four questions for our response.

Q1.20: Has the Habitat Regulations Assessment (HRA) been carried out in accordance with the Conservation of Habitats and Species Regulations 2017?

Yes, we support the approach taken, including the early engagement by the Local Planning Authority with Natural England.

Q1.21: Is there any substantive evidence to suggest the findings of the HRA are not robust?

We support the substantive findings of the HRA, but do consider that a modification to Policy DS4 is likely to be required in order to provide sufficient certainty that additional recreational pressure resulting from the Western Harbour strategic development site does not, alone, affect the Avon Gorge Woodlands SAC.

We understand that the Local Plan's housing targets are not reliant on delivery of the Western Harbour strategic site and therefore, if a modification were made, it would be unlikely to undermine the Plan. However, we recognise that it is for the Inspectors to judge whether or not that would be a soundness issue.

While the detail of development of the Western Harbour strategic site (Policy DS4) is not available at this stage, it is almost certain to result in a substantial increase in dwellings within walking distance of the Leigh Woods, part of the Avon Gorge Woodlands SAC. Further, anticipated greenspace provision is also yet to be determined. It is reasonable to conclude therefore that policy DS4 would add to known recreational pressures on the SAC, as detailed in the Site Improvement

Plan, through activities such as dog walking, and exercise on foot or bike, and that some combination of avoidance and mitigation measures would be required.

DS4 should, in our view, be amended to secure a deliverable mitigation strategy for the redevelopment area. This should require a commitment from the LPA to work with owners and managers of Avon Gorge Woodlands SAC to understand the pressures on the SAC and appropriate measures which would be able to reduce the impact of future visits on the qualifying features of the SAC. This should also encompass consideration of opportunities to provide alternative greenspace within or close to the Western Harbour strategic site. The LPA must secure a financial contribution from development proposed in Western Harbour to deliver the identified measures to reduce the impact from this area. We would expect this work to be undertaken in the development of the masterplan of the area and secured prior to development proposals coming forward from the site.

Q1.22: Does the Plan include the mitigation recommended by the HRA?

Yes, we understand that mitigation, including commitments to further work recommended on air quality and other matters, will be carried into the Plan. As per our response to the previous question, we would anticipate that a modification made to DS4 would be consistent with the HRA and perhaps require a short addendum to the latter.

Q1.23: Have Natural England been consulted on the preparation and content of the HRA and any associated Appropriate Assessment, as required by the relevant regulations?

Yes

If you have any queries relating to the advice in this letter please contact me on 07385 407115

Yours sincerely

Amelia Earley
Wessex Team