

# Summons to attend meeting of Full Council



**Date:** Tuesday, 14 November 2017

**Time:** 6.00 pm

**Venue:** Council Chamber, City Hall

**To: All Members of Council**

Members of the public attending meetings or taking part in Public forum are advised that all Full Council are now filmed for live or subsequent broadcast via the council's [webcasting pages](#). The whole of the meeting is filmed (except where there are confidential or exempt items) and the footage will be available for two years. If you ask a question or make a representation, then you are likely to be filmed and will be deemed to have given your consent to this. If you do not wish to be filmed you need to make yourself known to the webcasting staff. However, the Openness of Local Government Bodies Regulations 2014 now means that persons attending meetings may take photographs, film and audio record the proceedings and report on the meeting (Oral commentary is not permitted during the meeting as it would be disruptive). Members of the public should therefore be aware that they may be filmed by others attending and that is not within the council's control.

**Issued by:** Ian Hird, Democratic Services

City Hall, PO Box 3167, Bristol, BS3 9FS

Tel: 0117 92 22384

E-mail: [democratic.services@bristol.gov.uk](mailto:democratic.services@bristol.gov.uk)

**Date:** Monday, 6 November 2017



# Agenda

## 1. Welcome and safety information

Members of the public intending to attend the meeting are asked to please note that, in the interests of health, safety and security, bags may be searched on entry to the building. Everyone attending this meeting is also asked please to behave with due courtesy and to conduct themselves in a reasonable way.

Please note: if the alarm sounds during the meeting, everyone should please exit the building via the way they came in, via the main entrance lobby area, and then the front ramp. Please then assemble on the paved area between the side entrance of the cathedral and the roundabout at the Deanery Road end of the building.

If the front entrance cannot be used, alternative exits are available via staircases 2 and 3 to the left and right of the Council Chamber. These exit to the rear of the building. The lifts are not to be used. Then please make your way to the assembly point at the front of the building. Please do not return to the building until instructed to do so by the fire warden(s).

## 2. Apologies for absence

## 3. Minutes of previous meeting - 18 July 2017

To be confirmed as a correct record.

**(Pages 14 - 24)**

## 4. Declarations of interest

To note any declarations of interest from the Mayor and councillors. They are asked to indicate the relevant agenda item, the nature of the interest and in particular whether it is a disclosable pecuniary interest.

Any declaration of interest made at the meeting which is not on the register of interests should be notified to the Monitoring Officer for inclusion.

## 5. Lord Mayor's business



## **6. Public forum (public petitions, statements and questions)**

Please note:

Up to 30 minutes is allowed for this item. Public forum items should be e-mailed to [democratic.services@bristol.gov.uk](mailto:democratic.services@bristol.gov.uk)

Public forum items can be about any matter the Council is responsible for or which directly affects the city.

Please note that the following deadlines apply to this meeting:

a. Public petitions and statements: Petitions and written statements must be received by 12 noon on Monday 13 November 2017 at latest. One written statement per member of the public is permitted.

b. Public questions: Written public questions must be received by 5.00 pm on Wednesday 8 November 2017 at latest. A maximum of 2 questions per member of the public is permitted.

## **7. Petitions notified by councillors**

Please note:

Up to 10 minutes is allowed for this item.

Petitions notified by councillors can be about any matter the Council is responsible for or which directly affects the city.

The deadline for the notification of petitions to this meeting is 12 noon on Monday 13 November 2017 at latest.

## **8. Petition debate - "Save Clifton library"**

**(Pages 25 - 26)**

## **9. Petition debate - "Save Redland library"**

**(Pages 27 - 28)**

## **10. Petition debate - "Bristol needs libraries"**

**(Pages 29 - 30)**

## **11. Petition debate - "Protect our parks"**

**(Pages 31 - 33)**



## 12. Motions

### Note:

**Under the Council’s constitution, 30 minutes are available for the consideration of motions. In practice, this realistically means that there is usually only time for one, or possibly two motions to be considered. With the agreement of the Lord Mayor, motion 1 below will be considered at this meeting, and motion 2 may be considered subject to time.**

### **MOTION 1: SECURING THE FUTURE OF BRISTOL’S LIBRARY SERVICE**

Motion to be moved by: Cllr Anthony Negus, Liberal Democrat, Cotham ward

“Council notes the proposals by the Mayor to reduce the amount of libraries in Bristol from 27 to 10 libraries.

Council understands the difficult financial situation that Bristol City Council faces and the need to reduce costs during a time of reducing budgets and increasing demographic demand.

Council welcomes the petition by Love Bristol Libraries, various other library groups and campaigners, and believes there is strong public support for maintaining Bristol’s library provision.

Council notes the report from the Libraries Task and Finish Scrutiny Group, notes that it had input from all political parties and that the recommendations have the support of councillors from Conservative, Green, Labour and Liberal Democrat parties. The report also received the endorsement of OSMB.

Council endorses the central proposal to begin work on creating a mutual model for delivery of a comprehensive library service that will be professionally led, volunteer supported and ensures a network of branch libraries is maintained across the city. These proposals will also guarantee the jobs of professional library staff providing them with a secure future working alongside volunteers.

Council calls on the Mayor to bring forward new proposals based on the long term future of Libraries, an important principle for the ambitions of a Learning City. This new proposal to have a strategic approach that delivers a professionally led mutual model that embraces volunteers and secures the future of the library network.”



**MOTION 2 (subject to time): PROTECTING OUR PARKS**

Motion to be moved by: Cllr Weston, Conservative, Henbury and Brentry ward

“Council is convinced that the Mayor’s ‘new ways of delivering parks and open spaces’ strategy is based on a totally flawed and unworkable cost neutral funding model.

It has long been realised that parks and green spaces are treasured public assets which provide a wide range of health benefits, places for leisure and relaxation, as well as helping to improve the urban environment.

Previous threats to Bristol’s substantial amount of accessible green space (1500 hectares), contained in the controversial 20-year Parks & Green Space Strategy (P&GSS) were fiercely opposed in our city, and this experience should act as a warning to any politician who dismantles or inadvertently damages this precious Victorian heritage.

Council recognises that there are huge financial pressures on local authorities, and many competing demands on limited resources. For this reason, it is accepted that greater commercialisation and income generation has to be a part of helping to maintain the city’s diverse mix of parks and play spaces. Here, volunteers and community groups will also perform a critical role.

However, Council believes the £3.92m savings proposal currently adopted or applied is simply unachievable. Instead, this Council calls on the Mayor to set a realistic reduction target and provide this much-valued service with an adequate or far more sensible revenue budget. In addition, regarding income generation measures, Council requests that any increased hire rate for parks should not be applied to voluntary community groups.”

**Detail of other motions submitted (which will not be considered at this meeting due to time constraints) are set out for information only at the end of this agenda.**

**13. West of England Joint Spatial Plan****(Pages 34 - 444)****14. The Council's Pay Policy Statement for the period 15 November 2017 - 31 March 2019****(Pages 445 - 452)**

15. Designation of Head of Paid Service  
(Pages 453 - 456)
16. Licensing Committee - membership changes  
(Pages 457 - 458)
17. Information report - Treasury Management Annual Report 2016-17  
(Pages 459 - 477)
18. Information report - Decisions taken under special urgency provisions  
(Pages 478 - 480)
19. Information item - Exception to call-in procedure  
(Pages 481 - 482)
20. Information item - Report of Local Government Ombudsman in respect of the Council 2016-17  
(Pages 483 - 492)
21. Information item - Valuation process review - sale of Port freehold  
(Pages 493 - 497)
22. For information only - details of other motions submitted

**Note:**

**For information only: the motions set out below were also submitted for this meeting. Due to time constraints (see agenda item 12 above), the motions set out below will not be considered at this meeting.**



## As follows:

### **a. SENIOR MANAGEMENT SEVERANCE SETTLEMENTS**

Motion submitted by: Cllr Eddy, Conservative, Bishopsworth ward

“Council is increasingly concerned that the role of its Human Resources committee is being weakened particularly in the recruitment and removal processes followed for its most senior management posts.

Whilst private settlement agreements or confidentiality clauses can be expedient or useful for employers and departing employees alike, this practice also fosters frustration, suspicion and cynicism towards how local government is run.

Confidential severance payments are contrary to the Mayor’s professed long-held commitment to achieving greater transparency, openness and accountability in decision-making bodies. Indeed, it is often the case that even the existence of such a deal – let alone its contents - is deemed highly confidential and subject to legal redress.

Whatever the merits/demerits of these kinds of contractual terms, it is this Council’s considered view that there should be very limited circumstances for the application of these compromise arrangements especially in relation to early redundancy or severance of first and second tier officers.

Moreover, these expensive exercises are damaging to the reputation of this cash-strapped Authority and in reality are rarely successful in remaining concealed.

Accordingly, Council calls on the administration to limit the use of such settlement agreements and to make appointments more open and transparent in the future.”

Motion submitted by: Cllr Eddy, Conservative, Bishopsworth ward

Date submitted: 3 November 2017

### **b. COFFEE CUPS COST THE EARTH**

Motion submitted by: Cllr Clare Campion-Smith, Liberal Democrat  
Westbury-on-Trym & Henleaze

“Council notes growing concern about ‘single use’ drinking cups and the effect on the environment. Concerns are based on the following:

- To make takeaway coffee cups waterproof, the card is fused with polyethylene. This material cannot be separated out again at a standard recycling plant.



- There are only 2 highly specialised recycling facilities in the UK that are able to recycle such coffee cups.
- UK throws away 2.5 billion coffee cups a year, creating approximately 25,000 tonnes of waste.
- Only 0.25% of the 7 million coffee cups thrown away every day in the UK are recycled.
- Over 6.98 million coffee cups thrown away each day go to landfill or end up in the environment.
- Paper or cardboard coffee cups which are properly recyclable in the public waste disposal system do exist.

Council therefore calls on the Mayor:

To request the government to legislate for a small charge to be levied on such cups noting the success of the plastic bag charge in increasing the use of ‘bags for life’ and reducing plastic.

To require a small charge to be levied on the cups in use in the Council House and other venues controlled by the Council to initiate a change in habits for consumers and purveyors.”

Sources:

<https://www.parliament.uk/business/committees/committees-a-z/commons-select/environmental-audit-committee/news-parliament-2015/disposable-packaging-coffee-cups-plastic-bottles-inquiry-launch-16-17/>

<http://www.bbc.co.uk/news/business-40951041>

<http://www.bbc.co.uk/news/magazine-36882799>

<https://www.theguardian.com/environment/2017/mar/30/reusable-incentives-could-slash-disposable-coffee-cup-waste>

### **c. MENINGITIS**

Motion submitted by: Cllr Gill Kirk, Labour, Lockleaze ward

“Full Council notes:

1. The tragic deaths of George Zographou and Izzy Gentry, two of a number of students from St Brendan’s College to have been diagnosed with meningitis since 2016.
2. The almost tenfold increase in cases of meningitis and septicaemia in England between 2009/10 and 2015/16, which the National Health Service attributes almost entirely to the aggressive Men W strain.
3. That, while most people with meningococcal disease make a full recovery in the event of early diagnosis and antibiotic treatment, one in three teenagers with Men W sadly die from the disease.





4. The warning from Public Health England, after eight cases of meningitis in the city in the last year, that a further case of meningitis B would see further vaccinations given out, particularly at Bristol University.
5. That the then-most-signed Parliamentary e-petition in history called for free meningitis B vaccinations to be provided for older children and young people was dismissed as ‘not cost effective’ by HM Government in 2016.

This Council believes:

1. Our NHS and Public Health England provide vital services to our young people and everyone in society.
2. That the Government has a responsibility to maximise the resources of the NHS and others so that they may do their utmost to protect citizens from the known dangers of diseases such as meningitis.
3. That the expertise of the World Health Organisation and other medical bodies should continue to guide an evidence-based approach to public health and well-being policies.

Full Council resolves to ask the Mayor to:

1. Encourage parents to take up the offer of vaccinations currently provided on the NHS for their babies and young children, introduced in 2015, and teenagers and first-time college and university students to strongly consider getting the MenACWY vaccination.
2. Ask Bristol’s primary schools, secondary schools, colleges, sixth forms, universities, and other community spaces to raise awareness amongst their students around the symptoms and dangers of meningitis, and support the calls of Meningitis Now, a charity, for local radio stations, including BBC Radio Bristol, and other media organisations to play their part too.
3. Lobby the Secretary of State for Health to increase efforts to raise awareness and educate young people and parents.
4. Continue to liaise with Kerry McCarthy MP (Bristol East) ahead of the meeting which she has secured with the Secretary of State for Health to discuss this important topic.”

#### **d. NATIONAL JOINT COUNCIL (NJC) PAY**

Motion submitted by: Cllr Kye Dudd, Labour, Central ward

“Full Council notes that:

- NJC basic pay has fallen by 21% since 2010 in real terms.



- 1.5 million NJC workers had a three-year pay freeze from 2010-2012.
- Local terms and conditions of many NJC employees have also been cut, impacting on their overall earnings.
- NJC pay is the lowest in the public sector.
- Job evaluated pay structures are being squeezed and distorted by bottom-loaded NJC pay settlements needed to reflect the increased National Living Wage and the Foundation Living Wage.
- There are growing equal and fair pay risks resulting from this situation.
- The drastic ongoing cuts to local government funding the need for the Government to provide additional funding to fund a decent pay rise for NJC employees and the pay spine review.

This Council believes:

- In and supports the NJC pay claim for 2018, submitted by UNISON, GMB and Unite on behalf of council and school workers and calls for the immediate end of public sector pay restraint.
- That NJC pay cannot be allowed to fall further behind other parts of the public sector.
- That the joint review of the NJC pay spine would remedy the turbulence caused by bottom-loaded pay settlements.

Full Council therefore resolves to ask the Mayor to:

- Call on the LGA to make urgent representations to Government to fund the NJC claim and the pay spine review and notify us of their action in this regard.
- Write to the Prime Minister and Chancellor supporting the NJC pay claim and seeking additional funding to fund a decent pay rise and the pay spine review.
- Meet with local NJC union representatives to convey support for the pay claim and the pay spine review.”

## **e. SUPPORTING THE FINANCIAL TRANSACTIONS TAX (FTT)**

Motion submitted by: Cllr Carla Denyer, Green, Clifton Down ward

“Full Council notes that:

1. According to the Institute for Fiscal Studies, English councils have had their revenue budgets cut by £15bn (in today’s prices) between 2009-10 and 2016-17;<sup>1</sup>
2. According to the Local Government Association, English local government still faces a challenging overall funding gap of £5.8 billion by 2019/20.<sup>2</sup>
3. Extending the current Financial Transaction Tax on share transactions to other asset classes such as bonds and derivatives could raise more than £5bn of additional revenue in the UK every year;<sup>3</sup>
4. At least 10 European nations including France, Germany, Italy and Spain are moving ahead with FTTs on shares, bonds and derivatives estimated to raise £19bn a year.

Full Council believes that:



1. By 2020, local government will have seen a 7% decrease in government grant funding every year for a decade;<sup>4</sup>
2. Local government deserves to receive a significant proportion of FTT revenues, making an important contribution to both capital and revenue expenditure such as reversing cuts to adult social care;
3. Whilst an FTT might have a negligible effect on jobs in the City of London, investing FTT revenues in a smart and progressive way would see a significant increase in employment levels in other sectors.

Full Council resolves that:

1. The UK government should extend the current FTT on shares to other asset classes, such as bonds and derivatives.

Full Council further resolves to ask the Mayor to:

1. Write to the Prime Minister, Deputy Prime Minister, Leader of the Opposition, Chancellor and Shadow Chancellor of the Exchequer, and Secretary of State for Communities and Local Government stating this council's support for extending FTTs;
2. Write to all local MPs outlining the Council's position;
3. Support or host a meeting to discuss the ways of supporting this proposal."

Notes:

1. <https://www.ifs.org.uk/uploads/Presentations/British%20Local%20Government%20Finance%20in%20the%202010s%2C%20David%20Phillip.pdf>
2. [https://www.local.gov.uk/sites/default/files/documents/5.20%20budget%20submission\\_06.pdf](https://www.local.gov.uk/sites/default/files/documents/5.20%20budget%20submission_06.pdf)
3. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2908464](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2908464)  
<https://www.nao.org.uk/wp-content/uploads/2016/11/Overview-Local-government.pdf>

## **f. CLOSING THE COLD HOMES LOOPHOLE**

Motion to be moved by: Cllr Martin Fodor, Green, Redland ward

“Full Council notes:

1. The private rented sector is a major source of housing for families in the city, with many living in fuel poverty due to poor energy efficiency standards. Fuel poverty is defined by having to spend at least 10% of income after housing costs on fuel bills. For many it means a choice of ‘heat or eat’. An estimated 25,000 people in Bristol are classed as being in fuel poverty, many in the private rental sector.
2. After many years of delay, Government regulations will now require landlords of poorly insulated properties to upgrade them in order to make life more comfortable for their tenants and to cut carbon emissions. Homes rated in energy bands F and G (e.g. the coldest) must be brought up to band E.
3. However, an exemption exists allowing landlords to not undertake this work if it will cost them money - which it almost certainly will since



government energy efficiency schemes that they could have applied to have mostly closed or been significantly scaled down. As long as this loophole is open, the hardest to heat homes in the city will be left uninsulated.

4. Living in a cold home is bad for your physical and mental health; it damages children's educational development and affects many families in the city as well as many older people who then risk hypothermia.
5. The Mayor has done commendable work so far in bringing together Fuel Poverty stakeholders and with winter approaching more must now be done.

Full Council believes:

1. With colder weather on the way, the campaign to close the loophole that allows private rented sector landlords to duck their obligations to make their homes warmer is very timely.
2. There should be a replacement for the Green Deal Finance scheme which enabled investment to be made to upgrade homes at no upfront cost to the landlord or owner (with financing costs being paid for out of savings gained for the occupier from improved energy efficiency and lower bills – this is known as a Pay As You Save Scheme).

Full Council resolves to call on the Mayor to:

1. Support a national campaign by climate change charity 10:10 which is campaigning to close the loophole.
2. Write to all the local MPs and ask them to press the government to remove the exemption and provide a source of finance for landlords to upgrade their homes as required by the legislation.
3. Look into what the Council can do to further alleviate fuel poverty and encourage insulation through the Private Housing team.”

## **g. ACTION ON RESIDENTS PARKING**

Motion submitted by: Cllr Stephen Clarke, Green, Southville ward

“Full Council notes:

1. That the Mayor has recently refused to allow an extension of the Southville RPS scheme across to the South side of North St in Southville to include a small number of roads with terraced houses such as Friezwood Rd, Carrington Rd and Truro Rd.
2. This refusal is despite many requests that local councillors have received from residents in these roads to protect them from overspill from the Southville RPS schemes and traffic from the football and rugby crowds at Ashton Gate.
3. The recent consultation on changes to the Southville RPS also demonstrated strong support from the residents of these roads to an RPS extension to cover their area.
4. The problem is exacerbated by the fact that these few roads are squeezed between the Southville RPS scheme and newer housing that has off street parking.



Full Council believes that:

1. When residents of a specific area ask for help from the council in this way they should be listened to, otherwise they will perceive the whole process of consultation as being a meaningless tick-box exercise.
2. Inevitably there is going to be spillover problems from many existing RPS schemes but this is a specific area of only a few streets where intense problems have been caused by a council decision regarding parking. At very little expense this could now be solved by the council listening to the residents' request.
3. If a change is not made now it will probably not be made for many years.

Full Council resolves to call on the Mayor to:

1. Carry out a swift review of the situation in this specific area.
2. Depending on the results of that review, implement a strictly limited extension to the Southville RPS to cover the relevant roads.
3. Explain to the local residents what is happening and why such a clear request from residents and local councillors (who are supposed to be in charge of the process) has been ignored for so long."

---

Signed



Proper Officer  
Monday, 6 November 2017



## Bristol City Council Minutes of the Full Council

18 July 2017 at 6.00 pm



### **Present:**

Lesley Alexander, Lord Mayor; Marvin Rees, Mayor of Bristol

**Councillors:** Peter Abraham, Donald Alexander, Nicola Beech, Nicola Bowden-Jones, Harriet Bradley, Mark Brain, Charlie Bolton, Fabian Breckels, Tom Brook, Clare Champion-Smith, Tony Carey, Craig Cheney, Jos Clark, Stephen Clarke, Harriet Clough, Eleanor Combley, Asher Craig, Chris Davies, Mike Davies, Carla Denyer, Kye Dudd, Richard Eddy, Jude English, Martin Fodor, Helen Godwin, Geoff Gollop, John Goulandris, Fi Hance, Claire Hiscott, Helen Holland, Gary Hopkins, Chris Jackson, Carole Johnson, Anna Keen, Tim Kent, Sultan Khan, Gill Kirk, Cleo Lake, Mike Langley, Brenda Massey, Olly Mead, Matt Melias, Graham Morris, Anthony Negus, Paula O'Rourke, Steve Pearce, Celia Phipps, Ruth Pickersgill, Kevin Quartley, Liz Radford, Jo Sergeant, Afzal Shah, Paul Smith, Jerome Thomas, Mhairi Threlfall, Estella Tincknell, Jon Wellington, Mark Weston, Lucy Whittle, Chris Windows and Mark Wright

**Aldermen:** A Massey, J McLaren, B Price

### **1. Welcome and safety information**

The Lord Mayor welcomed all attendees to the meeting, and made a safety announcement in relation to the fire/emergency evacuation procedure.

### **2. Apologies for absence**

Apologies for absence were received from Councillors Bradshaw, Goggin, Hickman, Jones, Lovell and Stevens.

### **3. Minutes of previous meetings - to be confirmed as a correct record**

#### **a. Minutes – Annual Council meeting – 23 May 2017**



On the motion of the Lord Mayor, seconded by Councillor Eddy, it was

**RESOLVED:**

**That the minutes of the meeting of the Annual Council meeting held on 23 May 2017 be confirmed as a correct record and signed by the Lord Mayor.**

**b. Minutes – Extraordinary Full Council meeting – 27 June 2017**

On the motion of the Lord Mayor, seconded by Councillor Windows, it was

**RESOLVED:**

**That the minutes of the meeting of the Extraordinary Full Council meeting held on 27 June 2017 be confirmed as a correct record and signed by the Lord Mayor.**

**4. Declarations of interest**

Councillors Bradley, Threlfall and Tincknell declared an interest in relation to Motion 2 – Mitigation of university expansion, in each case relating to their employment by the University of the West of England.

**5. Lord Mayor's business**

**Former Councillor Rodney King**

The Lord Mayor referred to the recent death of former Councillor Rodney King.

Councillor Abraham then addressed the Full Council, in remembrance of former Councillor Rodney King.

The Full Council then stood and observed a minute's silence in remembrance of former Councillor Rodney King.

**6. Public forum (public petitions, statements and questions)**

**Public petitions:**

The Full Council received and noted the following petition:

Petition PP 01 – "Removal of parking restrictions – west end of City Road"

Petition organiser – Heuna Bitsios



**Public statements:**

The Full Council received and noted the following statements (which were also referred to the Mayor for his consideration/information):

PS 01 - Jo Benefield / Forward Maisokwadso and others – City of Sanctuary

PS 02 - Mike Baker – Historic buildings

PS 03 - David Redgewell – Transport issues

PS 04 - Jacqueline Walkden – Clean air

PS 05 - Adam Rich – Clean air

PS 06 - Sean McGough – Clean air

PS 07 - Dr Julie Milton – Clean air

PS 08 - Nikki Jones – Clean air

PS 09 - David Jepson – Motion 2 – Mitigation of university expansion

PS 10 - Merche Clark – Motion 2 – Mitigation of university expansion

PS 11 - Martin Grant – Clean air

PS 12 - Wendy Morgan – Clean air

PS 13 - Bristol City Youth Council – Motion 1 – Votes at 16

PS 14 - Coralline Dundon – Clean air

PS 15 - Rory Peliza – Clean air

PS 16 - Jim Tickner – Clean air

PS 17 - Chris Powell – Clean air

PS 18 - Brian Worthington – Motion 2 – Mitigation of university expansion

PS 19 - Rob Telford – Clean air

PS 20 - Corra Boushel – Clean air





PS 21 - Patricia Smith – Motion 2 – Mitigation of university expansion

PS 22 - Stuart Phelps – Stapleton Road cumulative impact area

PS 23 - Jane Phillips – Motion 2 – Mitigation of university expansion

PS 24 - Glenn Vowles – Clean air

PS 25 - Geoffrey Allan – Clean air

PS 26 - Neill Talbot – Clean air

PS 27 - Richard Barnes – Motion 2 – Mitigation of university expansion

PS 28 - Eleanor Breed – Motion 2 – Mitigation of university expansion

PS 29 - Colin Davis – Clean air

PS 30 - Stuart Phelps – Clean air

PS 31 - James Hanlon – Clean air

PS 32 - Christina Biggs – rail issues

PS 33 - Harriet Blackmore – Clean air

PS 34 - Alison Bromilow – Motion 2 – Mitigation of university expansion

PS 35 - Chris Millman – Clean air

PS 36 - Viran Patel – Council consultations

PS 37 - Guy Orpen – Motion 2 – Mitigation of university expansion

PS 38 - Alderman Mike Wollacott – Council finances

PS 39 - Jack Hazeldine – Council funding

PS 40 - Karen Sillence – Motion 2 – Mitigation of university expansion

Within the time available, statements were presented by individuals present at the meeting.



### **Public questions:**

The Full Council noted that the following questions had been submitted:

PQ 01 - Living wage - Question from Paul Wheeler

PQ 02 - Redland library consultation - Question from David Jepson

PQ 03 - Local highways issues and Canford Lane crossing - Question from Graham Donald

PQ 04 - Library consultation - Question from Merche Clark

PQ 05 - Redland library consultation - Question from Rosalind Miller

PQ 06 - Residents parking / congestion - Question from Edward Bowditch

PQ 07 - Clean air zone - Question from Edward Bowditch

Within the time available, the Mayor responded verbally to questions PQ 01, PQ 02, PQ 03, PQ 04 and PQ 05, and also responded to supplementary questions.

### **7. Petitions notified by councillors**

The Full Council received and noted the following petition:

Petition CP 01 – “Re-opening of Greystoke Avenue, Pen Park road end”

Petition presented by Councillor Massey.

Petition organiser – M Atwill

### **8. Petition debate: "Let Bristol breathe clean air"**

The Full Council considered a report of the Service Director - Legal and Democratic Services setting out details of a petition entitled “Let Bristol breathe clean air.” The petition had reached the 3,500 signature threshold to qualify for a Full Council debate.

Jon Eccles (on behalf of Jane Stevenson, the petition organiser) was invited by the Lord Mayor to present the objectives of the petition.

The Full Council then debated the petition.

Following the debate, it was



**RESOLVED:**

**That the petition be noted and referred to the Mayor for consideration and response.**

**9. "Clean air now for Bristol" - report back (for information) from Mayor on action taken in response to motion approved at Full Council on 8 November 2016**

The Full Council considered a report from the Mayor on action taken in response to a motion approved by Full Council on 8 November.

The Mayor introduced the report.

Following debate, it was:

**RESOLVED:**

**That the report be noted.**

**ADJOURNMENT** – At this point the Lord Mayor advised that the Full Council meeting would adjourn for a 20 minute refreshment break.

**10. Update report on Bristol education funding**

The Full Council considered a report providing an update following the motion on “Bristol education funding” approved by Full Council on 13 December 2016

Councillor Hiscott, Cabinet member for Education and Skills, introduced the report.

Following debate, it was

**RESOLVED:**

**That the report be noted.**

**11. Audit Committee - annual report 2016-17**

The Full Council considered the 2016-17 annual report from the Audit Committee.

Councillor Mead, Chair of the Audit Committee in 2016-17 moved the report and the recommendations set out therein.

Councillor J Clark, current Chair of the Audit Committee seconded the report.

Following debate, it was



**RESOLVED:**

**That Full Council accepts the report of the Audit Committee at Appendix A, and notes the assurances provided in the report.**

**12. Approval of appointment of Interim Director of Adult Social Services**

The Full Council considered a report from the Chief Executive recommending approval of the appointment of an Interim Director of Adult Social Services.

The Lord Mayor moved the report and the recommendation set out therein.

Councillor Holland seconded the report.

It was then

**RESOLVED:**

**That Full Council approves the appointment of Terry Dafter as the authority's Interim Director of Adult Social Services.**

**13. Dates and times of Full Council meetings**

The Lord Mayor advised Full Council that following discussions involving the Mayor and other party group leaders, the following dates and times of Full Council meetings for the remainder of 2017-18 had been agreed:

6.00 pm, Tuesday 14 November 2017

2.00 pm, Tuesday 12 December 2017

2.00 pm, Monday 15 January 2018

2.00 pm, Tuesday 20 February 2018 (budget Council meeting)

6.00 pm, Tuesday 20 March 2018

The date of the September Full Council meeting was the subject of further discussion and would be notified as soon as possible.

**14. Motions**

**Motion 1 – Votes at 16**

Councillor English moved the following motion:



“Full Council notes:

1. That currently 1.5 million 16 and 17 year olds are denied the vote in public elections in the UK.
2. That 16 and 17 year olds are able to vote in local elections in Scotland, and in elections to the Scottish and Manx Parliament.
3. That the campaign to lower the voting age is supported by thousands of young people across the UK, as well as a wide range of youth and democracy organisations and hundreds of MPs and elected representatives across the UK, and that following a nationwide consultation, the UK Youth Parliament voted it as their national campaign for 2017, and that it is also an integral part of the Bristol Youth Manifesto.

Full Council believes that:

1. 16 and 17 year olds are knowledgeable and passionate about the world in which they live and are as capable of engaging in the democratic system as any other citizen;
2. Lowering the voting age to 16, combined with strong citizenship education, would empower young people to better engage in society and influence decisions that will define their future;
3. People who can consent to medical treatment, work full-time, pay taxes, get married or enter a civil partnership and join the armed forces should also have the right to vote.

Full Council resolves to call on the Mayor to:

1. Publically support votes at 16 and join the Votes at 16 Coalition;
2. Inform local MPs and the media of this decision and work with them in support of this campaign;
3. Promote this policy through council communications;
4. Run activities to raise awareness of and support for Votes at 16 in Bristol;
5. If Bristol pilots e-voting, to commit to including 16 and 17 year olds for demonstration purposes, and further extend e-voting to Bristol City Youth Council elections, demonstrating innovation in digital democracy;
6. Formally request to government that Bristol be used as a pilot to trial Votes at 16 in council elections.”

Councillor Fodor seconded the motion.

Following debate, upon being put to the vote, the motion was CARRIED (45 members voting in favour, 12 against, with 1 abstention), and it was then

**RESOLVED:**

**Full Council notes:**

- 1. That currently 1.5 million 16 and 17 year olds are denied the vote in public elections in the UK.**
- 2. That 16 and 17 year olds are able to vote in local elections in Scotland, and in elections to the Scottish and Manx Parliament.**
- 3. That the campaign to lower the voting age is supported by thousands of young people across the UK, as well as a wide range of youth and democracy organisations and hundreds of MPs and elected representatives across the UK, and that following a nationwide consultation, the UK Youth Parliament**



voted it as their national campaign for 2017, and that it is also an integral part of the Bristol Youth Manifesto.

**Full Council believes that:**

- 1. 16 and 17 year olds are knowledgeable and passionate about the world in which they live and are as capable of engaging in the democratic system as any other citizen;**
- 2. Lowering the voting age to 16, combined with strong citizenship education, would empower young people to better engage in society and influence decisions that will define their future;**
- 3. People who can consent to medical treatment, work full-time, pay taxes, get married or enter a civil partnership and join the armed forces should also have the right to vote.**

**Full Council resolves to call on the Mayor to:**

- 1. Publically support votes at 16 and join the Votes at 16 Coalition;**
- 2. Inform local MPs and the media of this decision and work with them in support of this campaign;**
- 3. Promote this policy through council communications;**
- 4. Run activities to raise awareness of and support for Votes at 16 in Bristol;**
- 5. If Bristol pilots e-voting, to commit to including 16 and 17 year olds for demonstration purposes, and further extend e-voting to Bristol City Youth Council elections, demonstrating innovation in digital democracy;**
- 6. Formally request to government that Bristol be used as a pilot to trial Votes at 16 in council elections.**

## **Motion2 – Mitigation of university expansion**

Councillor Negus moved the following motion:

“Full Council notes the benefits that the Universities bring our City: vibrancy, earnings, new value added businesses, employment opportunities and a source of civic pride. But there are downsides too and as recent growth has been high and is expected to reach 60,000, these new generally short term residents are increasing the severe strain on council services, the housing market and longer term residents in high-density student areas.

Particular groups are disproportionately affected:

- Anyone renting, due to increased demand for accommodation and so paying higher rents, and this includes university staff and their post and undergraduates too.
- Residents living in communities which are affected by high concentrations of this one demographic.
- Council finances; the provision of services to tens of thousands of students. These services used to be funded by the Government from a block grant but this is being cut to zero.

Full Council therefore asks the Mayor to:

1. In conjunction with other Council Leaders, engage with the Government, to highlight that the current approach to university growth is creating unsustainable pressure on Council resources; having to service



100% of its population with only 85-90% of them paying council tax. Adequate funding arrangements will probably require changes to planning obligation and taxation advantages given to university and student accommodation of all sizes. A grant or a means of local collection and redistribution of taxes needs to be put in place so Councils can provide services like street cleaning and implement the housing and transport solutions required to ensure balanced communities and mitigate the effects of university expansion on the housing market.

In addition Full Council agrees that necessary work should be done locally in Bristol and in the Combined Authority to update the Universities' masterplans so as to deliver sustainable future expansion, housing and transport solutions. Co-operative recording and planning policies need to be updated and true recognition given to the impact that unbalanced communities bring to all residents.

Further Full Council requests the Mayor to instruct officers to:

2. Develop a bespoke SPD which looks at best practice around the country, uses up to date data from Universities on their impact, both positive and negative and seeks to improve the amenity of everyone's lives in areas hard hit by current and future growth in numbers.
3. Require the Universities to support transport and housing solutions for more than just first years.
4. Set up an all-party commission to oversee the above processes and liaise with Universities to progress other possible approaches and keeping members informed."

Councillor Smith seconded the motion.

Following debate, upon being put to the vote, it was

**RESOLVED:**

**Full Council notes the benefits that the Universities bring our City: vibrancy, earnings, new value added businesses, employment opportunities and a source of civic pride. But there are downsides too and as recent growth has been high and is expected to reach 60,000, these new generally short term residents are increasing the severe strain on council services, the housing market and longer term residents in high-density student areas.**

**Particular groups are disproportionately affected:**

- Anyone renting, due to increased demand for accommodation and so paying higher rents, and this includes university staff and their post and undergraduates too.
- Residents living in communities which are affected by high concentrations of this one demographic.
- Council finances; the provision of services to tens of thousands of students. These services used to be funded by the Government from a block grant but this is being cut to zero.

**Full Council therefore asks the Mayor to:**



**1. In conjunction with other Council Leaders, engage with the Government, to highlight that the current approach to university growth is creating unsustainable pressure on Council resources; having to service 100% of its population with only 85-90% of them paying council tax. Adequate funding arrangements will probably require changes to planning obligation and taxation advantages given to university and student accommodation of all sizes. A grant or a means of local collection and redistribution of taxes needs to be put in place so Councils can provide services like street cleaning and implement the housing and transport solutions required to ensure balanced communities and mitigate the effects of university expansion on the housing market.**

**In addition Full Council agrees that necessary work should be done locally in Bristol and in the Combined Authority to update the Universities' masterplans so as to deliver sustainable future expansion, housing and transport solutions. Co-operative recording and planning policies need to be updated and true recognition given to the impact that unbalanced communities bring to all residents.**

**Further Full Council requests the Mayor to instruct officers to:**

**2. Develop a bespoke SPD which looks at best practice around the country, uses up to date data from Universities on their impact, both positive and negative and seeks to improve the amenity of everyone's lives in areas hard hit by current and future growth in numbers.**

**3. Require the Universities to support transport and housing solutions for more than just first years.**

**4. Set up an all-party commission to oversee the above processes and liaise with Universities to progress other possible approaches and keeping members informed.**

Meeting ended at 9.24 pm

**CHAIR** \_\_\_\_\_





## Full Council 14 November 2017



**Report of:** Shahzia Daya, Service Director – Legal & Democratic Services

**Title:** **Petition debate – “Save Clifton library”**

**Ward:** Clifton

### **Recommendation**

**That Full Council debates the petition and refers it to the Mayor / relevant Cabinet member for a formal response.**

### **Summary**

Under the Council’s petitions scheme, where a petition has 3,500 or more signatures from people who live, work or study in Bristol, the petition organiser can request a Full Council debate.

The Council has received a petition entitled “Save Clifton library”

The petition organiser has requested that Full Council debates the petition.



---

## Details of the petition

1. The wording of the petition is as follows:

Petition title / subject: "Save Clifton library"

Petition wording:

"We the undersigned draw the attention of Bristol City Council to the importance of Clifton Library to the local community. We reject the current proposals and call on the Council to investigate every possible means of keeping libraries open, including successful schemes operated by other local authorities such as City of York Council."

Additional comments / background information from petition organiser:

"Reading should be recognised and promoted as the basis of learning at all stages of life.

Our library is:

- \* the only public community facility in the area
- \* a vital link for many older people
- \* the only online public facility for people who do not have home IT."

2. The petition organiser is Michael Barton.
3. The petition secured 4242 signatures meeting the petition scheme criteria.
4. The Full Council is asked to debate the petition.
5. Under the petition scheme, the petition organiser is permitted up to 5 minutes to present and speak to the petition. The petition organiser has advised that Catherine Howie will speak to the petition on his behalf. The petition scheme allows a further period of up to 15 minutes for discussion of the petition by councillors at the Full Council meeting.
6. The Full Council has agreed the following in relation to dealing with petitions with over 3500 signatures: The topic of the debate should be referred to the Mayor/Cabinet, or other relevant body with the petitioner's views and Full Council's views.

### **RECOMMENDATION**

**Following the debate, the Full Council is recommended to refer the petition to the Mayor, in order that the Mayor can consider his response, in liaison with the relevant Cabinet member.**

## Full Council 14 November 2017



**Report of:** Shahzia Daya, Service Director – Legal & Democratic Services

**Title:** **Petition debate – “Save Redland library”**

**Ward:** Redland

### **Recommendation**

**That Full Council debates the petition and refers it to the Mayor / relevant Cabinet member for a formal response.**

### **Summary**

Under the Council’s petitions scheme, where a petition has 3,500 or more signatures from people who live, work or study in Bristol, the petition organiser can request a Full Council debate.

The Council has received a petition entitled “Save Redland library”

The petition organiser has requested that Full Council debates the petition.



---

## Details of the petition

1. The wording of the petition is as follows:

Petition title / subject: "Save Redland library"

Petition wording:

"We ask the Mayor and Bristol City Council to reconsider the withdrawal of funding for Redland Library by the Library Service, which would be the outcome of any of the options within the Neighbourhood Consultation document published on 13 June 2017. We believe the Council should seek additional funding to keep a library service available to all communities in the city."

Additional comments / background information from petition organiser:

"Redland Library is the third most-used branch library in the city, based on each of: total visits, items borrowed, computer users and active members. It is well placed to serve several neighbourhoods, as shown in the wide range of postcodes of its users, and has good train and bus connections. It has served as a public library since it was built in 1885, is on the Local List for its communal, architectural and historic value. It provides a meeting place for parents with young children, and for the elderly, and is also increasingly being used as a community building out of library hours because of its good location and the lack of other community resources in the area."

2. The petition organiser is Merche Clark.
3. The petition secured 4269 signatures meeting the petition scheme criteria.
4. The Full Council is asked to debate the petition.
5. Under the petition scheme, the petition organiser is permitted up to 5 minutes to present and speak to the petition. The petition scheme allows a further period of up to 15 minutes for discussion of the petition by councillors at the Full Council meeting.
6. The Full Council has agreed the following in relation to dealing with petitions with over 3500 signatures: The topic of the debate should be referred to the Mayor/Cabinet, or other relevant body with the petitioner's views and Full Council's views.

### **RECOMMENDATION**

**Following the debate, the Full Council is recommended to refer the petition to the Mayor, in order that the Mayor can consider his response, in liaison with the relevant Cabinet member.**

## Full Council 14 November 2017



**Report of:** Shahzia Daya, Service Director – Legal & Democratic Services

**Title:** **Petition debate – “Bristol needs libraries”**

**Ward:** Citywide

### Recommendation

**That Full Council debates the petition and refers it to the Mayor / relevant Cabinet member for a formal response.**

### Summary

Under the Council’s petitions scheme, where a petition has 3,500 or more signatures from people who live, work or study in Bristol, the petition organiser can request a Full Council debate.

The Council has received a petition entitled “Bristol needs libraries”

The petition organiser has requested that Full Council debates the petition.



---

## Details of the petition

1. The wording of the petition is as follows:

Petition title / subject: "Bristol needs libraries"

Petition wording:

"We call on the Mayor, Cabinet and Council to reconsider current plans for the library service and to extend the consultation which is now underway, in both time and scope. The current, limited, consultation is not fit for purpose. All of the options it offers would result in the withdrawal of funding from 17 libraries, causing irreversible damage to a vital service. We urge the Council to reconsider the level of savings required from this service and to seek additional resources to make such drastic cuts unnecessary."

Additional comments / background information from petition organiser:

"Libraries have the ability to support the transformation of individuals, communities and society as a whole. The range of outcomes they help to achieve is substantial and varied, and the Government is therefore committed to ensuring that there remains a strong library service.' (Department of Culture, Media and Sport). Bristol is presenting a plan to close 17 out of its 27 libraries and to reduce stock development and promotion, reader engagement and children's work. This would leave a severely reduced service, out of the reach of many. An accessible network of libraries is vital for the range of community services which are currently provided and which could continue to be developed. Many communities are offered no choice at all – 13 libraries would be closed and seven kept open under all options presented – and no choice is being offered on opening hours. The consultation is taking place over the summer period, which is likely to limit overall participation and which excludes students who are important users of the service. The format of this consultation fails to enable the public to express their views about the nature, location and funding of the library service for the future."

2. The petition organiser is Jill Kempshall.
3. The petition secured 4447 signatures meeting the petition scheme criteria.
4. The Full Council is asked to debate the petition.
5. Under the petition scheme, the petition organiser is permitted up to 5 minutes to present and speak to the petition. The petition scheme allows a further period of up to 15 minutes for discussion of the petition by councillors at the Full Council meeting.
6. The Full Council has agreed the following in relation to dealing with petitions with over 3500 signatures: The topic of the debate should be referred to the Mayor/Cabinet, or other relevant body with the petitioner's views and Full Council's views.

## RECOMMENDATION

**Following the debate, the Full Council is recommended to refer the petition to the Mayor, in order that the Mayor can consider his response, in liaison with the relevant Cabinet member.**

## Full Council 14 November 2017



**Report of:** Shahzia Daya, Service Director – Legal & Democratic Services

**Title:** **Petition debate – “Protect our parks”**

**Ward:** Citywide

### **Recommendation**

**That Full Council debates the petition and refers it to the Mayor / relevant Cabinet member for a formal response.**

### **Summary**

Under the Council’s petitions scheme, where a petition has 3,500 or more signatures from people who live, work or study in Bristol, the petition organiser can request a Full Council debate.

The Council has received a petition entitled “Protect our parks”

The petition organiser has requested that Full Council debates the petition.



---

## Details of the petition

1. The wording of the petition is as follows:

Petition title / subject: "Protect our parks"

Petition wording:

"Bristol City Council's published budget proposals show that they will stop funding our parks from April 2019, relying instead on revenue generated from parks events and other outside sources. Bristol Parks Forum believes this is impossible to achieve in such a short timescale. Many other big cities are exploring this option, some have already decided it simply won't work; this was also the conclusion of last year's Select Committee of the House of Commons. We, the undersigned, call on Bristol City Council to withdraw this budget plan and work with the Parks Forum and others to develop a realistic alternative."

Additional comments / background information from petition organiser:

"Bristol's parks & green spaces are important to the people of Bristol and to their health and wellbeing. They also play a vital role in attracting visitors to the city and reducing the impact of air pollution and climate change, the current plans place our parks at great risk.

The Bristol City Council proposal is for the Parks Service to operate on a 'cost neutral' basis from April 2019. This means they will stop funding parks - a budget cut of £4.5m. Unless Bristol Parks find ways to replace all this funding with additional income there is a high risk that there will be a drastic cut in the maintenance of parks that will lead to a downward spiral of reduced use and increased anti-social behaviour as standards fall.

The budgeted parks income for 2016/17 was less than £1m. Increasing income on the scale proposed would require significant investment of both of capital and commercial expertise over several years.

Bristol Parks Forum believes that while a significant increase in income can be achieved; having well maintained parks operating on a cost neutral basis by 2019 is simply not possible."

2. The petition organiser is Rob Acton-Campbell (Bristol Parks Forum)
3. The petition secured 4411 signatures meeting the petition scheme criteria.
4. The Full Council is asked to debate the petition.
5. Under the petition scheme, the petition organiser is permitted up to 5 minutes to present and speak to the petition. The petition scheme allows a further period of up to 15 minutes for discussion of the petition by councillors at the Full Council meeting.



- 
6. The Full Council has agreed the following in relation to dealing with petitions with over 3500 signatures: The topic of the debate should be referred to the Mayor/Cabinet, or other relevant body with the petitioner's views and Full Council's views.

**RECOMMENDATION**

**Following the debate, the Full Council is recommended to refer the petition to the Mayor, in order that the Mayor can consider his response, in liaison with the relevant Cabinet member.**

# Full Council

14<sup>th</sup> November 2017



**Report of:** Zoe Willcox Service Director Planning

**Title:** West of England Joint Spatial Plan

**Ward:** All wards

**Member Presenting Report:** Cllr Nicola Beech, Cabinet Member for Strategic Planning and City Design

## Recommendation

That Full Council agrees that:

1. the draft West of England Joint Spatial Plan (JSP) in Appendix A to this report is published for consultation under regulations 19, 20 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012;
2. if the JSP is ready for independent examination, it is submitted to the Secretary of State before the end of March 2018 under regulation 22 of the regulations along with the other submission documents required by regulations, and;
3. the Service Director for Planning, or any other Director with responsibility for Strategic Planning, is delegated the authority, in consultation with the Cabinet Member for Strategic Planning and City Design and in co-ordination with Bath and North East Somerset, South Gloucestershire and North Somerset Councils, to;
  - a) make modifications to the JSP if needed, either prior to publication or prior to submission, and
  - b) respond to issues arising during the examination, including making modifications to the JSP



## Summary

The report seeks authorisation to progress the draft West of England Joint Spatial Plan for the period 2016 to 2036 to formal publication for consultation prior to submission to the Secretary of State for examination.

The draft JSP was considered by the West of England Joint Committee on 30<sup>th</sup> October and authorisation for publication is now being sought of each of the constituent councils.

When adopted, the Joint Spatial Plan will provide the strategic planning policy framework to guide the management and use of land in the public interest. The JSP will set the overall quantum of housing development required up to 2036 in the WoE and will identify the broad locations where development will be supported, to be brought forward through the authorities Local Plans. The Joint Spatial Plan will support the review of the Bristol Local Plan.

### **The significant issues in the report for Bristol are:**

The Joint Spatial Plan will provide for the delivery of:

- 105,500 new homes across the WoE between 2016 and 2036
- 33,500 new homes within the Bristol City Boundary
- 24,500 new affordable homes across the WoE

Bristol residents will benefit from:

- New homes within the urban fabric of Bristol and provision for new homes at the Brislington Park and Ride and land within the Bristol City Boundary at Bath Road. New homes will also be provided at Strategic Development Locations across the WoE.
- the provision of affordable homes within Bristol and in adjoining authorities
- Identification of new strategic transport and other infrastructure to support the growth of homes and jobs in the WoE.

Working together the West of England authorities will make the most of development opportunities to ensure that balanced and sustainable communities are delivered with high quality built and green environment throughout.

## Policy

1. The JSP is being prepared as a statutory Development Plan Document. Its preparation is regulated by statute. The next steps entail public consultation, submission and Examination into the 'soundness' of the Plan.
2. The Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The JSP provides the spatial framework for the review of the Bristol Local Plan.

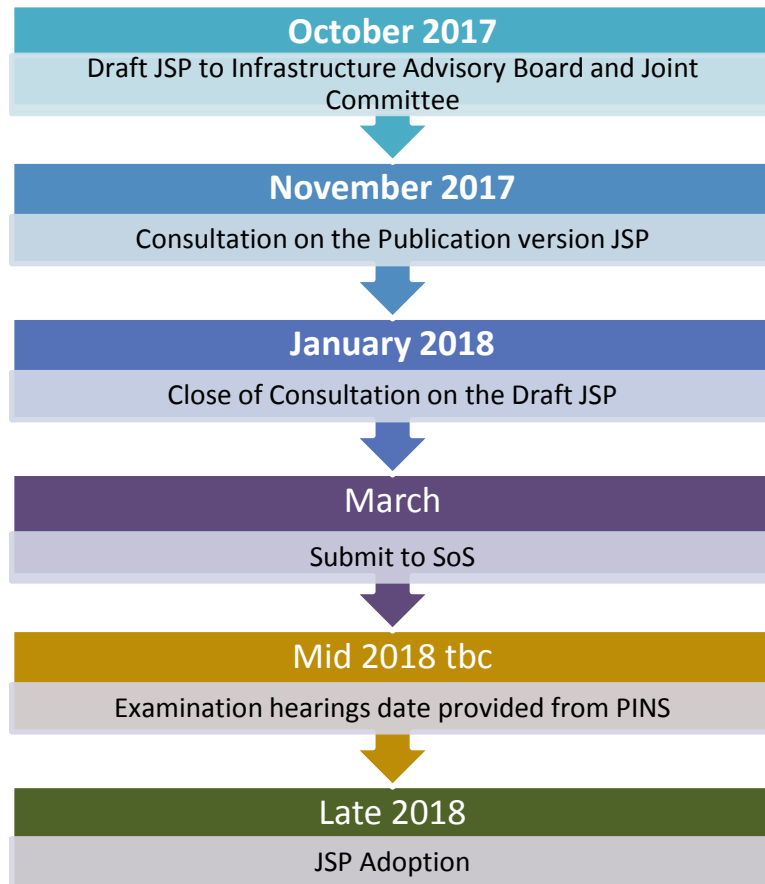
## Consultation

3. **Internal**  
Strategic Leadership Team
4. **External**  
Statutory stakeholder and community stakeholders and organisations.

## Context

5. The West of England faces a significant strategic challenge; to accommodate and deliver much needed new homes and jobs properly supported by infrastructure, to create attractive places while maintaining the environmental assets and quality of life unique to our area.
6. The Joint Spatial Plan (JSP) will address these challenges in a coordinated approach, outlining the housing and employment requirement of the West of England for the period 2016-2036. The document will provide the joint framework to ensure that development requirements are brought forward consistently across the West of England authorities.
7. This coordination on strategic planning matters is complemented by the approach to addressing strategic transport issues through the Joint Transport Study (JTS). The JTS has informed the JSP by outlining future strategic transport proposals for delivery up to 2036 that address current challenges on the network and inform future development proposals.
8. The preparation stages of the JSP are set out in the diagram below. This has entailed consultation under regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012, through the 'Issues and Options' and 'Towards the Emerging Spatial Plan' consultation stages. These consultation documents and supporting technical information are available for public viewing [here](#).
9. The next consultation on the JSP will be on the Publication Plan under regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012. The Publication version JSP is attached at appendix A.
10. The proposed consultation period will be from the 22nd November 2017 to the 10th January 2018. If the plan is ready, and subject to any minor modifications, the Plan will then be

submitted to the Secretary of State under regulation 22 of the Town and Country Planning (Local Planning) Regulations 2012, in March 2018 for a proposed Examination in Public (EiP) mid-2018. Following the examination and consideration of the Inspector’s report, the plan will be adopted by the four Authorities. Once adopted, the JSP will become a statutory Development Plan Document and will guide the four Councils in the development of their Local Plans.



11. Members of the West of England Scrutiny Committee received an update on the JSP and the key issues it will need to address at its meeting on 27th September and considered the Publication Plan at their meeting on 24th October. The Infrastructure Advisory Board, considered the Publication Plan document on 23rd October 2017. Their views were summarised and considered by the Joint Committee at their meeting on 30th October 2017.

## Proposal

### The Joint Spatial Plan:

12. The Publication version Joint Spatial Plan and appropriate supporting documents are appended to this report. Further technical documents will be produced and made available during the consultation stage to support this document.

## Scope

13. The JSP is a strategic level Development Plan Document that will form the strategic policy

context for individual Local Plans prepared by the four authorities. The JSP will be a statutory document and will therefore need to be prepared in accordance with statute, local plan regulations and national policy to ensure it is a ‘sound’ document supported by technical evidence.

14. The scope of the JSP, with its supporting evidence base, is focused on: identifying the number of new market and affordable homes and amount of employment land needed across the West of England from 2016-2036; identifying the most appropriate spatial strategy and strategic locations for growth; and, outlining the strategic transport and other infrastructure required to support sustainable growth.

### Key Issues

15. Previous stages of the Plan’s preparation included public consultation on the key issues and challenges that should be addressed. The comments received have been considered and used to inform the draft Plan’s critical issues and strategic priorities. Key issues of which the JSP has needed to address include:
- Identifying housing and employment need.
  - Affordable housing delivery.
  - Quality of homes and place and communities.
  - Infrastructure to support growth.
16. In addressing these key issues, the draft Plan document outlines the following critical issues and strategic priorities:

Critical Issue	Strategic Priority
There is a critical need to substantially boost the housing supply, particularly affordable housing of which the need is acute across the Plan area.	1. To meet the sub-region’s identified housing needs, in a sustainable way. In particular to make a substantial step change in the supply of affordable housing across the plan area.
Economic prosperity has brought substantial benefits to residents, communities & the environment. However, prosperity has not been shared equally by all communities as there are pockets of deprivation within the sub region.	2. To pursue inclusive economic growth by accommodating the economic growth objectives of the LEP Strategic Economic Plan. Particularly to: <ul style="list-style-type: none"> <li>• promote the growth of existing employment centres such as the Enterprise Zones and Enterprise Areas</li> <li>• ensure more inclusive growth and life chances for all, across the West of England, and improve accessibility to jobs.</li> </ul>
The form and function of development in some parts of the	3. To deliver a spatial strategy which;

<p>West of England has resulted in significant pressure on infrastructure and settlement patterns which are over-reliant on the private car.</p> <p>This inhibits wealth creation and productivity and contributes to climate change and poor health.</p>	<ul style="list-style-type: none"> <li>• focuses on three primary centres of Bristol, Bath and Weston-super-Mare and recognises the complementary role of market towns to achieve sustainable growth.</li> <li>• ensures that new development is properly aligned with infrastructure and maximises opportunities for sustainable and active travel.</li> <li>• through a place making approach promotes places of density and scale with a range of facilities and which encourages health lifestyles and cultural wellbeing.</li> <li>• integrates high quality, multi-functional green infrastructure. Reduces greenhouse gas emissions and ensure resilience to the impacts of climate change.</li> </ul>
<p>The sub-region benefits from a world class environment. This brings substantial economic and community benefits and contributes significantly to the quality of life of residents, visitors and businesses.</p>	<p>4. To protect and enhance the sub-region’s diverse and high quality natural, built and historic environment and secure a net gain in biodiversity.</p> <p>To prioritise development on brown field locations, optimise densities and retain the overall function of the Bristol and Bath Green Belt.</p>

## The Policies

17. The Policy framework in the JSP addresses the critical issues and strategic priorities. In summary the policy framework is as follows:
18. Policy 1: Housing Requirement: The JSP sets out the housing need for the period of 2016-2036. The overall housing need for the plan area up to 2036 is 102,200. The housing provision set for the JSP is 105,500 new dwellings which includes a flexibility in supply to ensure the delivery of the housing need. A contingency of around 3,000 dwellings is also identified for consideration as part of plan review should further capacity be required in the future. The mechanism to release any contingency is a plan review at the five year review period. The policy establishes the distribution between the unitary authority areas based on the spatial strategy (outlined within Policy 2).
19. Policy 2: Spatial Strategy: This policy sets out the spatial strategy and the justification underlying the choice of locations for identifying how the JSP housing and job requirements will be delivered across the West of England. The strategy is depicted on the Key Diagram. The reasoned justification to this Policy provides the basis by which the JSP has established the exceptional circumstances to some proposed amendments to the general extent of the Bristol and Bath Green Belt to sustainably accommodate the growth required over the plan period.

20. The following sequential approach for housing growth has been applied to achieve the Plan's strategic aims:-
- Reviewing existing commitments,
  - Maximising urban capacity and optimising density,
  - Allowing for small windfalls beyond that included in Local Plans,
  - Allowing for 'non-strategic' growth,
  - Assessing potential strategic locations, and
  - Assessing other sources e.g. empty homes, specialised housing such as Students & C2 etc
21. Policy 3: Affordable Housing Target: There is a critical need to deliver the affordable housing needs for the West of England. The Policy sets the Affordable Housing Target and the framework to boost the delivery of Affordable Housing across the West of England from 2016-2036.
22. Policy 4: Employment land requirement: This policy sets out the overall West of England jobs requirement and identifies key strategic employment locations including:
- Existing and strategic town centres
  - Enterprise Zones and Areas
  - Key strategic infrastructure employment locations
  - Additional employment land (floor space and ha) provision will also be identified at strategic development locations.
23. Policy 5: Place making principles: This policy sets out the strategic principles to ensure the delivery of high quality and sustainable new development incorporating multi-functional place making principles. These principles will be taken forward and refined through Local Plans and supporting Supplementary Planning Documents.
24. Policy 6: Strategic Infrastructure: The delivery of new homes through the JSP has an impact on the strategic infrastructure requirements for the West of England. The growth provided through the JSP will add to historic pressures on infrastructure namely transport. The JSP will ensure new development is properly aligned with infrastructure. This policy identifies the strategic infrastructure required to deliver the JSP growth elements. This will reflect the JSP Key Diagram and the supporting Infrastructure Delivery Programme.
25. Policy 7: Strategic development locations (SDL): This policy sets out the specific policy requirements for each of the proposed SDLs. These locations will not be allocated through the JSP it will be the role of the new Local Plans prepared by individual authorities to make the allocations for the SDLs and provide delivery guidance.

### **Duty to Cooperate**

26. The 4 authorities of the West of England; Bath & North East Somerset Council, Bristol City Council, North Somerset Council, South Gloucestershire Council and the West of England Combined Authority are committed to work collaboratively through a plan-led approach. Engagement with neighbouring authorities has been ongoing. This is consistent with the Government's core planning principles and the Duty to Cooperate (DtC). By preparing the JSP the 4 authorities are ensuring compliance with the DtC.



## Other Options Considered

27. The process of preparing the Joint Spatial Plan has involved publication of a number of options for development locations for the delivery of this strategic level spatial plan. No alternative to the Joint Spatial Plan is considered appropriate at this formal stage which sets out the plan which the West of England authorities consider to be ‘sound’ under the National Planning Policy Framework – namely that it is:
- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
  - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
  - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
  - **Consistent with national policy** – the plan should enable the delivery of sustainable development.
28. The reasoned justification included after the policies in the Plan, along with the supporting attachments to this report, explains the rationale for the preferred spatial strategy and why the UAs think this accords with the requirements for soundness.
29. In seeking to formulate the most appropriate strategy (see para 27 above), the four UAs have been obliged to consider the reasonable alternatives. These are included in;
- The reasoned justification to the Polices in the JSP publication document
  - Appendix C: Draft Sustainability Appraisal (summary).
  - Appendix D: Habitats Regulation Assessment update paper.
  - Appendix E: Report on Engagement and main issues raised.
  - Appendix F: Topic Paper 1: The Housing Requirement.

## Risk Assessment

30. There are the following risks associated with this project:

<b>FIGURE 1</b>						
<b>The risks associated with the implementation of the recommendation to agree the publication of the Joint Spatial Plan:</b>						
RISK	INHERENT RISK (Before controls)		RISK CONTROL MEASURES	CURRENT RISK (After controls)		RISK OWNER
	Impact	Probability		Impact	Probability	
That the Joint Spatial Plan is published and consulted on, progresses to examination but is not found sound	Medium	High	The Joint Spatial plan has been prepared following guidelines and planning regulations, with extensive public consultation. Professional advice has been sought where needed to inform the drafting of the plan.	Low	Low	Sarah O'Driscoll
That there is a significant issue raised during the consultation which will delay the submission.	Medium	Medium		Low	Low	Sarah O'Driscoll

**FIGURE 2****The risks associated with not implementing the proposal to agree publication of the Joint Spatial Plan:**

RISK	INHERENT RISK		RISK CONTROL MEASURES	CURRENT RISK		RISK OWNER
	Impact	Probability		Impact	Probability	
The failure to progress the WoE JSP to publication and subsequent examination will mean that Bristol City Council has no jointly agreed and statutorily based policy approach for the provision of new housing and employment opportunities across the West of England. Bristol will be unable to meet the needs for residents for jobs and new homes.	<b>High</b>	<b>High</b>	The Joint Spatial Plan has been prepared following guidelines and planning regulations, with extensive public consultation. Professional advice has been sought where needed to inform the drafting of the plan.	<b>High</b>	<b>High</b>	Sarah O'Driscoll

**Public Sector Equality Duties**

- 32a) Before making a decision, section 149 Equality Act 2010 requires that each decision-maker considers the need to promote equality for persons with the following “protected characteristics”: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation. Each decision-maker must, therefore, have due regard to the need to:
- i) Eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Equality Act 2010.
  - ii) Advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to:
    - remove or minimise disadvantage suffered by persons who share a relevant protected characteristic;
    - take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of people who do not share it (in relation to disabled people, this includes, in particular, steps to take account of disabled persons' disabilities);
    - encourage persons who share a protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
  - iii) Foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to –
    - tackle prejudice; and
    - promote understanding.

- 32b) Engagement with equalities communities and stakeholders and consideration of relevant issues has been undertaken as part of the preparation of the Joint Spatial Plan. A full EqIA of the policies of the WoE JSP has been undertaken and is available.

## **Legal and Resource Implications**

### **Legal**

33. The JSP will ultimately form part of each UA's adopted Development Plan and as such it must be prepared in accordance with the statutory requirements and guidance. The publication and consultation will meet these requirements and will enable the JSP to move on to formal submission to the Secretary of State once the response to the consultation has been considered and the Council is satisfied that it will be submitting a plan that is sound.

**(Legal advice provided by Joanne Mansfield (Lawyer) 30<sup>th</sup> October 2017)**

### **Financial**

#### **(a) Revenue**

34. The City of Bristol's share of the cost in relation to the production of the JSP is covered by Earmarked Reserves in 17/18. The JSP provides the approach to the distribution of growth and development to be embedded in the West of England area over the next 20 years.

#### **(b) Capital**

There are no capital financial implications.

**(Financial advice to be provided by Tian Ze Hao Finance - Business Partner Place 26<sup>th</sup> September 2017 )**

### **Land**

35. The Council in its capacity as landowner fully supports the draft Joint Spatial Plan proposals and recognises that through the adoption of the JSP, the Council's potential for utilising its land and buildings to contribute to the proposed housing delivery numbers both within Bristol and in partnership with its neighbouring local authorities, will be greatly assisted. The adoption of the JSP will also enable the Council to increase the opportunity to redevelop its brownfield land assets and ensure that its property holdings operate and are developed in the most efficient manner to increase the employment, infrastructure and economy levels within the wider area of Bristol.

**(Land advice provided by: Joe Jeffrey - Service Manager Property Development 27<sup>th</sup> October 2017)**

### **Personnel**

36. There are no direct Human Resources implications for the Council arising from these recommendations.

**(Personnel advice provided by Alex Holly - Neighbourhoods Business Partner 24 October 2017)**

**Appendices:**

Appendix A: West of England Draft Joint Spatial Plan: Publication Draft in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Appendix B: Strategic Development Location Templates.

Appendix C: Draft Sustainability Appraisal (summary).

Appendix D: Habitats Regulation Assessment update paper.

Appendix E: Report on Engagement and main issues raised.

Appendix F: Topic Paper 1: The Housing Requirement.

Appendix G: WoE Equalities Impact Assessment.

**LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

**Background Papers:**

National Planning Policy Framework 2012

National Planning Practice Guidance

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

Planning & Compulsory Purchase Act 2004 (amended)

Bristol City Council Core Strategy 2011

Bristol City Council Site Allocations and Development Management Local Plan 2014

Bristol City Council Central Area Plan 2015

LEP Strategic Economic Plan

Joint Transport Study 2017

## WEST OF ENGLAND JOINT SPATIAL PLAN - October 2017

### Foreword

The West of England (WoE) currently faces a key challenge; how to accommodate and deliver much needed new homes, jobs and infrastructure alongside protecting and enhancing our unique and high quality built and natural environment. It is this combination that will create viable, healthy and attractive places. This is key to the ongoing success of the West of England which contributes to its appeal and its high quality of life.

Many people feel passionately about where they live and the impact new growth might have on their local communities. They value their local environment, landscape and biodiversity in terms of how it enhances the character and identity of places, and the well-being of residents. This plan, aims to build a common understanding of the need for new housing and the benefits that new development will bring including transport improvements, and the opportunity to improve the links for all our communities with homes and jobs.

This is not just a local issue. The UK is struggling to meet growing demand for new homes. The national economic prosperity relies on areas of growth such as the West of England to increase productivity. It is important that the housing market enables a flexible labour market to support a productive economy. A range of suitable housing options is needed to meet the needs of our ageing population, increase community involvement and improve wellbeing.

We have to address key economic and social imbalances within our city region and support inclusive growth. In the WoE, we need to take steps to ensure more homes are built of the right type and mix, and in locations that people and businesses need. Businesses should be able to locate where they can be most efficient and create jobs, enabling people to live, rent and own homes in places which are accessible to where they work. Transport and infrastructure provision needs to be in place up front or to keep pace with development to support sustainable growth.

The challenges involved and the scale of the issues to be addressed requires a strategic approach and a new strategic direction.

We have joined forces to prepare a different type of plan to tackle this challenge. The **Joint Spatial Plan** (JSP) is a strategic Development Plan Document that will provide the strategic overarching development framework to guide housing, employment and infrastructure requirements to 2036.

We are committed to this plan led approach to provide certainty to our communities and investors, in order to secure high quality, sustainable growth for the West of England.

INSERT SIGNATURES

### CHAPTER 1: INTRODUCTION

#### A plan for sustainable growth

1. The West of England (WoE) currently faces a key challenge: how to accommodate and deliver much needed new homes and jobs properly supported by infrastructure to create attractive places, while maintaining the environmental assets and quality of life unique to our area. The scale of the issue to be addressed requires an ambitious strategic response.
2. The local authorities of Bath and North East Somerset Council, Bristol City Council, North Somerset Council and South Gloucestershire Council have joined forces to prepare the Joint Spatial Plan (JSP). The JSP is a statutory Development Plan Document that will provide the strategic overarching development framework for the West of England to 2036. Joint working on this plan is part of the authorities ongoing commitment to meeting the duty to cooperate.
3. In tandem with the JSP, a Joint Transport Study (JTS) has been prepared. The JTS has identified potential future strategic transport proposals for delivery up to 2036 that address current challenges on the network and to inform future development proposals in this plan. The JTS sets out the following Transport Vision:  
*“Transport in the West of England will be transformed over the next 20 years through a programme of complementary measures designed to address underlying challenges and to enable the sustainable delivery of new housing and employment growth.”*
4. The JTS has informed, and has been informed by, the JSP. This joint approach to planning and transport will ensure that future growth decisions are made with an understanding of the necessary transport investment needed to achieve sustainable communities.

#### Purpose of the Joint Spatial Plan

5. The four authorities are committed to a positive plan-led approach to steer the nature and location of future development and secure funding for essential infrastructure. This is consistent with the Government’s core planning principles and the Duty to Cooperate. The JSP will form the strategic policy for individual Local Plans prepared by the four authorities. The scope of the JSP, with its supporting evidence base, is focused on addressing the following critical issues:
  - identifying the number of new market and affordable homes and amount of employment land that is needed across the West of England 2016-2036.
  - identifying the most appropriate spatial strategy and strategic locations for this growth.
  - outlining the strategic transport and other infrastructure that needs to be provided in the right place and at the right time to support sustainable growth and to provide certainty for our communities and those that want to invest in our area.

## APPENDIX A

### Relationship of the Joint Spatial Plan to Local Plans

6. The JSP is a strategic statutory development plan document (DPD) for the West of England. It is being prepared jointly by and will cover the 4 Unitary Authorities of Bristol, Bath and North East Somerset, North Somerset and South Gloucestershire.
7. On adoption as a Development Plan document it will carry full weight in the planning system and provide the higher level strategic planning policy framework for each authority's new Local Plan for the period 2016 to 2036. Whilst the JSP will not allocate new sites, it does identify new strategic development locations (SDL's), which are shown on the Key diagram. These will be brought forward as allocations through each authority's new Local Plan New site specific allocations and policy designations in Local Plans will need to be in conformity with the JSP.
8. The JSP is not a qualifying document for establishing planning permission in principle under the Housing and Planning Act 2016.
9. In March 2017 the West of England Combined Authority (WECA) was established. The Combined Authority comprises Bath and North East Somerset, Bristol and South Gloucestershire Councils. The Combined Authority has a Mayor who has devolved powers including strategic planning, and a duty to prepare a Mayoral Spatial Strategy. This duty takes effect from May 2018. The Mayoral Spatial Strategy will relate to the areas covered by the Combined Authority. The Joint Spatial Plan which is being prepared by the 4 West of England authorities will provide a firm foundation to inform its preparation.

### Sustainability Appraisal and Evidence Base.

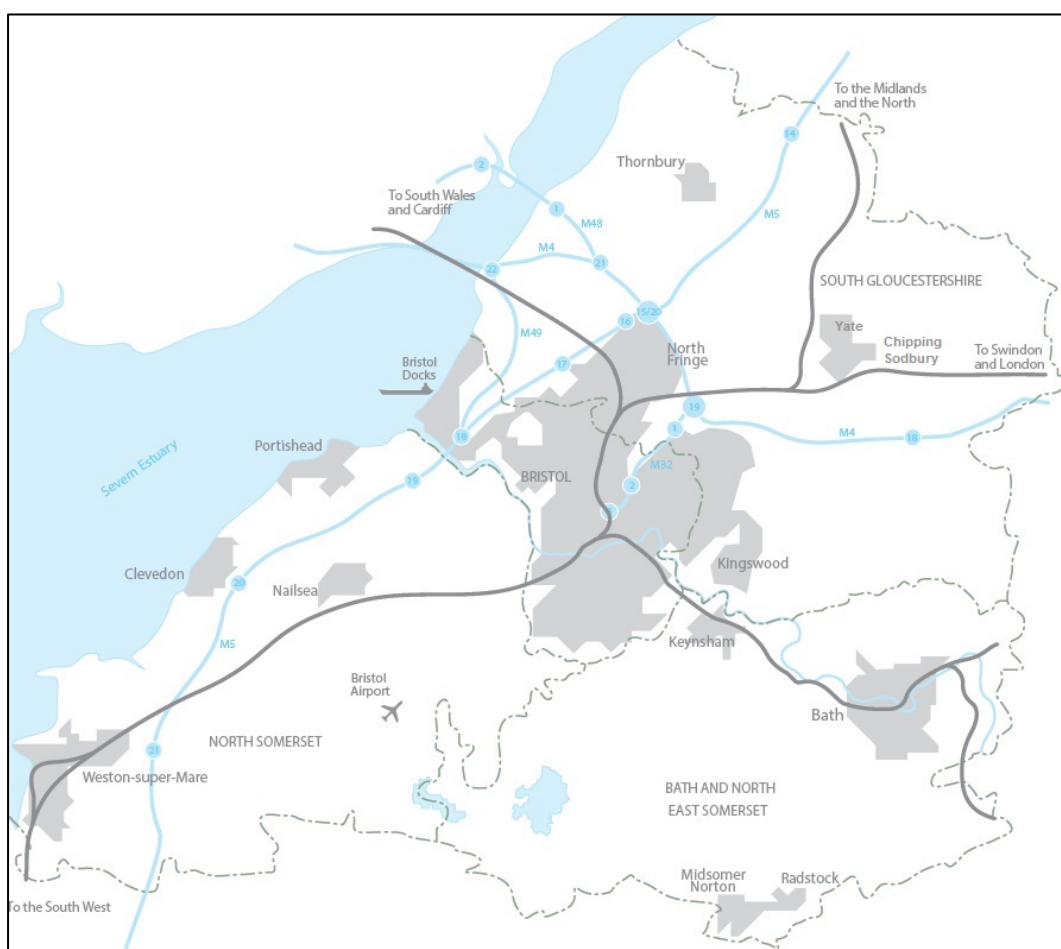
10. The Joint Spatial Plan has been subject to a Sustainability Appraisal as an integral part of its production to help formulate the strategy. A scoping report was published alongside the Issues and Options document in November 2015. An appraisal of the Emerging Spatial Strategy draft plan was published in September 2016. A Sustainability Appraisal for this final draft Joint Spatial Plan has been published alongside the plan.
11. A substantial evidence base has been prepared to support and inform the preparation for this plan. Full details are available at:  
[www.jointplanningwofe.org.uk](http://www.jointplanningwofe.org.uk)
12. The Plan has been prepared working closely with key stakeholders including;
  - Government agencies: Homes and Communities Agency, Environment Agency, Natural England, Historic England, Highways England, Network Rail
  - Neighbouring Authorities
  - Public Health
  - Infrastructure Providers, and in
  - consultation with delivery partners.

## CHAPTER 2: VISION, CRITICAL ISSUES & STRATEGIC PRIORITIES

### The Plan area

1. The West of England (WoE) covers the four Unitary Authorities (UAs) of Bath and North East Somerset (B&NES), Bristol, North Somerset and South Gloucestershire. This is the **Plan area** for the JSP as shown in Figure 1.

**Figure 1: West of England Plan area.**



### Housing Market Areas

2. The National Planning Policy Framework (NPPF) requires local plans to be informed by a Strategic Housing Market Assessment (SHMA) in order that there is a clear understanding of the needs of their area. The first required step is to establish the Housing Market Area (HMA).
3. The SHMA identifies two separate Housing Market Areas that operate across the West of England. One focussed on the wider Bristol HMA, which includes Weston-super-Mare as a sub housing market area, and the other focussed on Bath.
4. The JSP sets out the housing target across the whole plan area (encompassing all four Unitary Authorities) based upon meeting the needs of both the wider Bristol

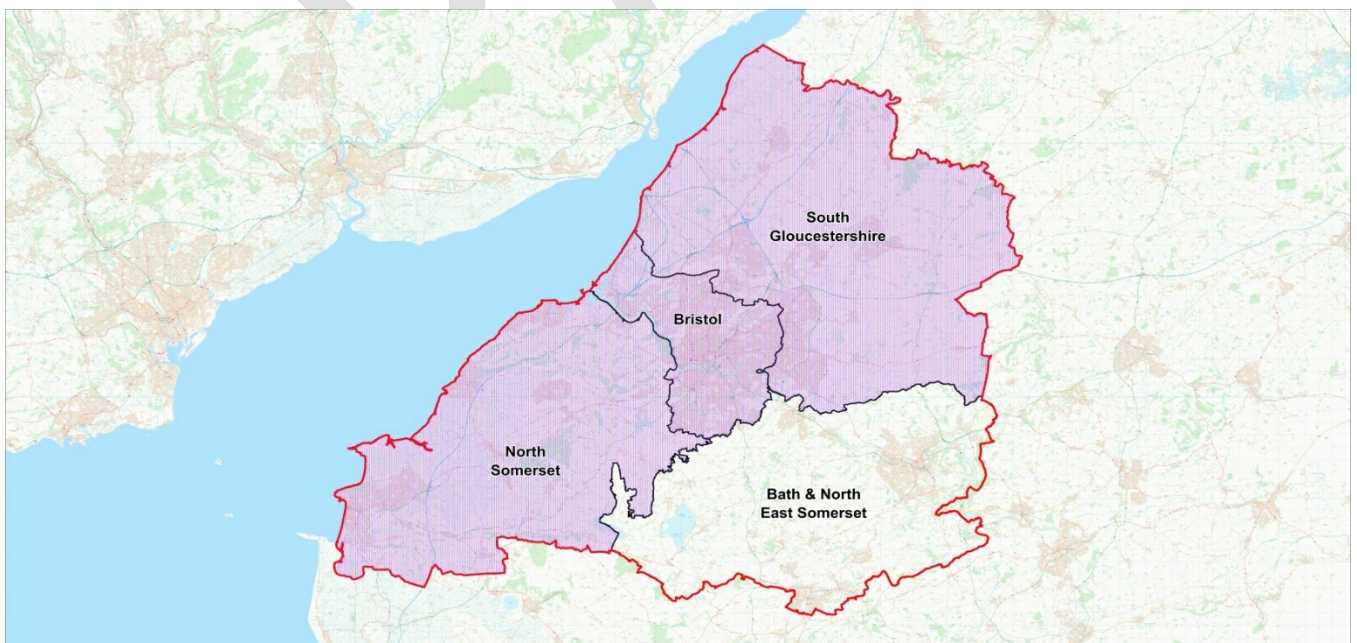
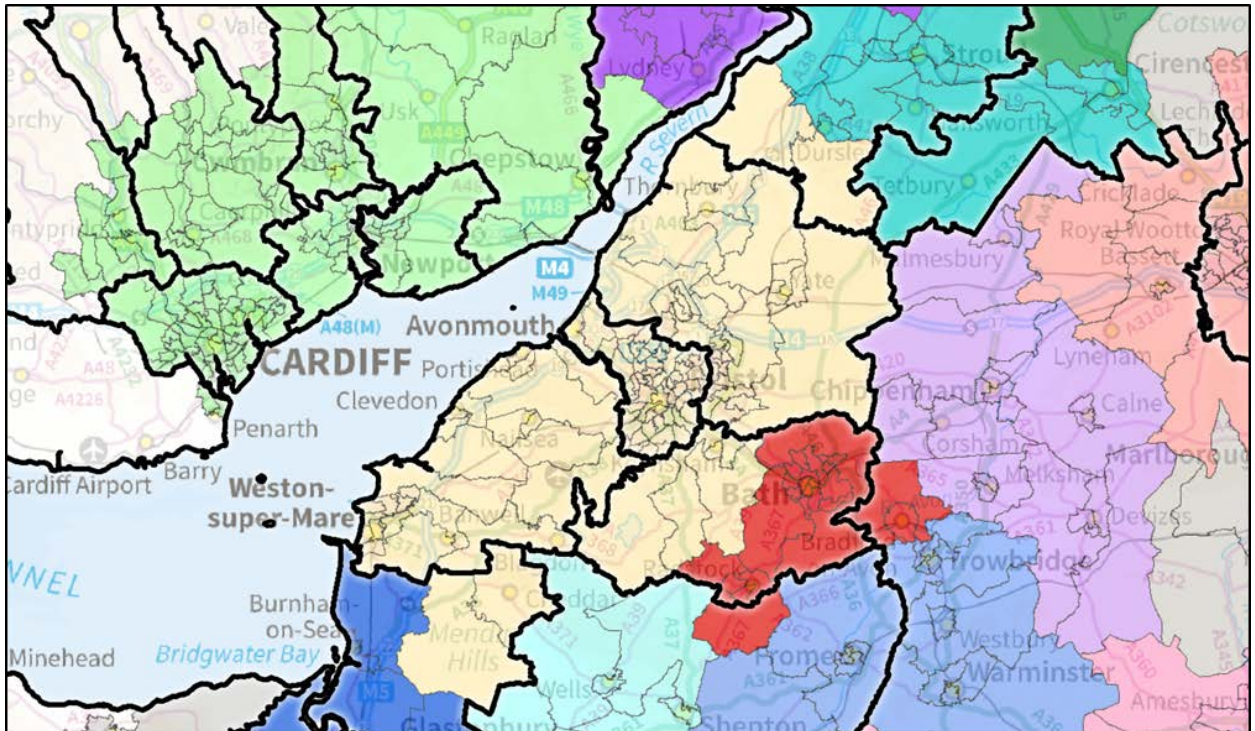


## APPENDIX A

HMA and the Bath HMA. Further information on housing need is set out in Chapter 4 alongside Policy 2.

5. The diagrams below show both the technical HMAs and the functional HMAs in the West of England.

**Figure 2: Technical and functional Housing Market Areas.**



## APPENDIX A

### Functional Economic Market Areas

6. The Economic Development Needs Assessment (EDNA) has defined the West of England (encompassing all four Unitary Authorities) as a Functional Economic Market Area (FEMA). This is because there is a high level of people, almost 90%, who live in the area and also work in the area.
7. The JSP sets out the current and future strategic employment locations 2016-2036 that are needed to support the job forecasts which underpin the West of England's economic aspirations. Furthermore detailed work will be undertaken in local plans to ensure local needs are met in the context of local market conditions. This will include identification of economic priorities and options for the distribution of employment land supply. Both the HMA and FEMA evidence show a high level of functional containment within the WoE geographical area. The WoE therefore performs strongly as a geographical unit and this provides an effective basis to plan for a sustainable spatial strategy for the Bristol City Region.
8. The WoE is a generally prosperous area with an excellent quality of life and a growing national and international profile.

DRAFT

## APPENDIX A

### West of England Key facts and figures

- The WoE covers an area of 1,343 km<sup>2</sup>. It has a growing population which currently stands at 1.1 million people, around 90% of which live in urban areas. The three principal urban areas are Bristol (617,280 pop), Bath (94,782 pop) and Weston-super-Mare (84,452 pop)<sup>1</sup>.
- Its economy is worth £31bn a year and makes a net contribution to the UK Treasury.
- 22% of employment is within the high-tech economy above the national average.
- 44% of the population has higher level skills Level 4 or above. There are skill gaps in the workforce at entry level and Level 2 qualifications.
- There is good connectivity including accessibility to London, South Wales the Midlands and the South West, a major airport and port, rail and strategic road network, all of which enables access to global mass markets.
- The WoE has an outstanding physical environment with two Areas of Outstanding Natural Beauty, the only UK 'whole city' World Heritage Site, coast, areas of international ecological importance and a diverse countryside with attractive market towns and villages.
- Between 2006/7 and 2015/6 26% of new homes built, were Affordable Homes in the WoE.
- Affordability ratios (average earnings to average house prices vary across the sub region), UA averages are: B&NES 10.5, Bristol 9.2, N.Som 8.0, and S.Glos 8.4. Compared to the National average of 7.9<sup>2</sup>.
- The WoE has a number of areas which fall within the 10% most deprived nationally equating to some 83,916 people or 7.8% of the WoE population. These areas are focused primarily in Bristol and Weston-super-Mare.
- The 2011 census shows that across the West of England around 14 % of commuters walk to work and 5% cycle, which are above the national average of 11%and 3% respectively.
- Bus patronage has increased by 17% since 2008/09, which is against the national trend of decline, although the number of bus journeys per head of population are still below other core English cities.
- Approximately 2% of commuting journeys are by train.
- Car based travel still accounts for around two-thirds of commuting journeys in the West of England.

---

<sup>1</sup> Source 2011 Census, based on the usual residents by built up area

<sup>2</sup> Source: Land Registry; Annual Survey of Hours and Earnings, Office for National Statistics.

## APPENDIX A

### Critical issues

9. Previous stages of the plan's preparation included public consultation on the key issues and challenges that should be addressed. The comments received have been taken into account and used to inform the Plan's critical issues and strategic priorities. The table below demonstrates what we consider are the critical issues facing the West of England and how these relate to the Plan's spatial objectives and overarching strategic priorities.

**Figure 3 Critical issues and strategic priorities.**

Critical Issue	Strategic Priority	Policy framework	Outcome
There is a critical need to substantially boost the housing supply, particularly affordable housing of which the need is acute across the Plan area.	1. To meet the sub-region's identified housing needs, in a sustainable way. In particular to make a substantial step change in the supply of affordable housing across the plan area.	1, 2, 3, 7	Delivery of the Plan's housing requirement and affordable housing target (as set out at Policy 1 and Policy 3 in accordance with the Plan's spatial strategy at Policy 2).
Economic prosperity has brought substantial benefits to residents, communities & the environment. However, prosperity has not been shared equally by all communities as there are pockets of deprivation within the sub region.	2. To pursue inclusive economic growth by accommodating the economic growth objectives of the LEP Strategic Economic Plan. Particularly to: <ul style="list-style-type: none"> <li>• promote the growth of existing employment centres such as the Enterprise Zones and Enterprise Areas</li> <li>• ensure more inclusive growth and life chances for all, across the West of England, and improve accessibility to jobs.</li> </ul>	4	Delivery of the Plan's employment land requirement (as set out at Policy 4 in accordance with the Plan's spatial strategy at Policy 2).
The form and function of development in some parts of the West of England has resulted in significant pressure on infrastructure and settlement patterns which are over-reliant on the private car.	3. To deliver a spatial strategy which; <ul style="list-style-type: none"> <li>• focuses on three primary centres of Bristol, Bath and Weston-super-Mare and recognises the complementary role of market towns to achieve sustainable growth.</li> <li>• ensures that new</li> </ul>	2,5,6,7	Sustainable growth of homes and jobs, supported by necessary infrastructure.  Reduction in car dependency and improved public transport access to opportunity, jobs and

## APPENDIX A

<p>This inhibits wealth creation and productivity and contributes to climate change and poor health.</p>	<p>development is properly aligned with infrastructure and maximises opportunities for sustainable and active travel.</p> <ul style="list-style-type: none"> <li>• through a place making approach promotes places of density and scale with a range of facilities and which encourages healthy lifestyles and cultural wellbeing.</li> <li>• integrates high quality, multi-functional green infrastructure. Reduces greenhouse gas emissions and ensure resilience to the impacts of climate change.</li> </ul>		<p>services.</p> <p>Contribution to mitigating impacts of climate change.</p> <p>Delivery of Communities in which people want to live and work and;</p> <p>Improved health and well being outcomes.</p>
<p>The sub-region benefits from a world class environment. This brings substantial economic and community benefits and contributes significantly to the quality of life of residents, visitors and businesses.</p>	<p>4. To protect and enhance the sub-region's diverse and high quality natural, built and historic environment and secure a net gain in biodiversity.</p> <p>To prioritise development on brown field locations, optimise densities and retain the overall function of the Bristol and Bath Green Belt.</p>		<p>Enhanced quality of the natural, built and historic environment.</p> <p>Biodiversity gains.</p>

## APPENDIX A

### Vision and Strategic Priorities

10. The West of England Joint Spatial Plan vision is consistent with national policy, and stems from the critical issues identified in the Issues and Options document, and the WoE LEP Strategic Economic Plan (SEP) economic vision for the sub-region to 2036. The economic vision has been augmented to reflect social and environmental aspirations. The proposed vision for the JSP has public support as demonstrated by 71% of respondents to the public consultation at the end of 2015.

#### **Proposed Vision for the West of England Joint Spatial Plan**

By 2036 the WoE will be one of Europe's fastest growing and most prosperous city regions with the gap between disadvantaged and other communities closed and a rising quality of life for all. The rich and diverse environmental character will be integral to health and economic prosperity. Patterns of development and transport will facilitate healthy and sustainable lifestyles. Provision of a range of housing types, will be of high quality and more affordable. Existing and new communities will be well integrated, attractive and desirable places and supported by the necessary infrastructure. New development will be designed to be resilient to, and reduce the impacts of climate change.

DRAFT

## CHAPTER 3: FORMULATING THE SPATIAL STRATEGY

1. The role of the JSP is to provide the broad spatial strategy that will:
  - deliver the Plan Vision and strategic priorities in order to address the critical issues identified in chapter 2, and
  - secure the delivery of the identified needs of development.
2. The Spatial Strategy has been formulated to deliver the Objectively Assessed Need of 97,800 new homes and the Housing Requirement of 102,200 new homes. It identifies an overall supply of 105,500 new homes to enable flexibility.
3. The Spatial Strategy supports the delivery of 82,500 jobs. The employment aspects of the strategy are described under Policy 4.
4. It is the role of the individual UAs, to provide the more detailed local policies, including how the different components of housing need are met such as the needs of the travelling community, students, older people and the range of dwelling types and size needed.

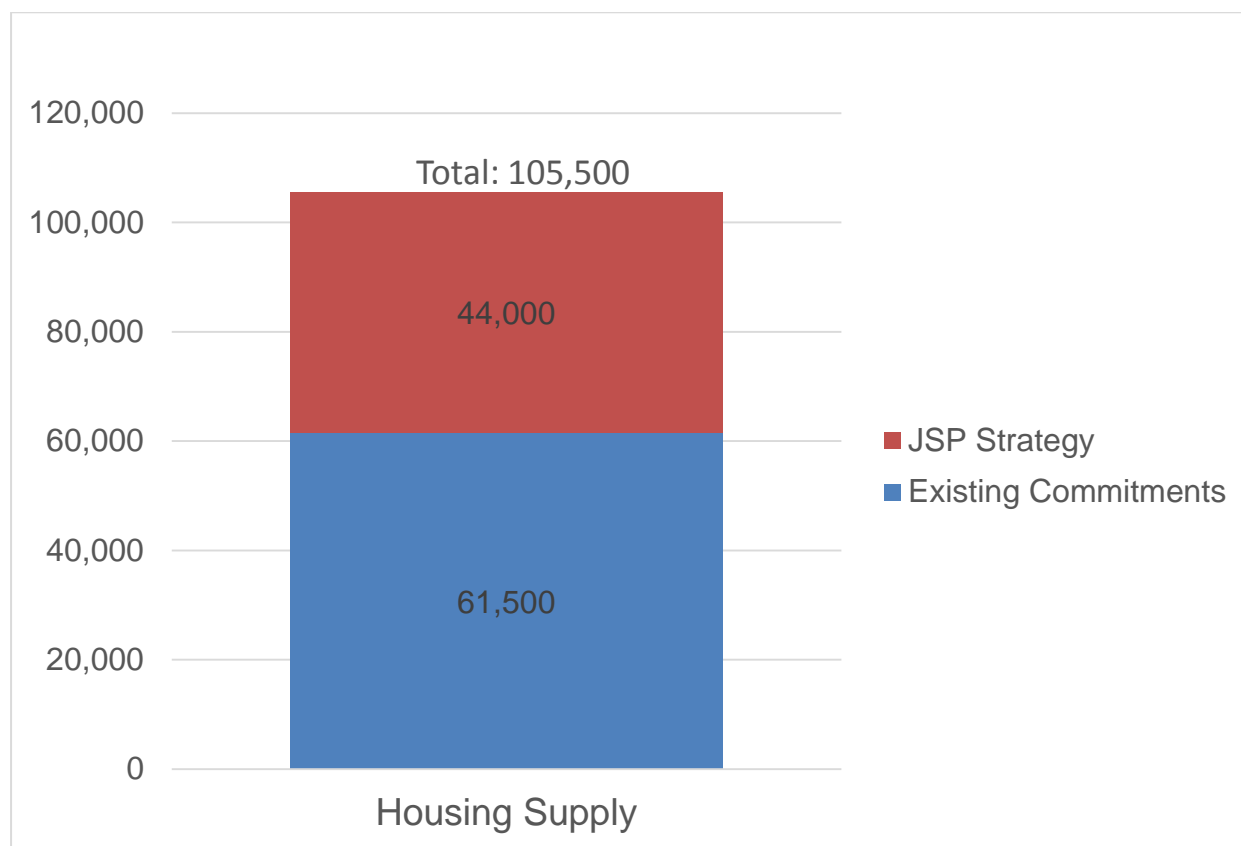
### Building the spatial strategy:

5. Topic Paper x sets out how the spatial strategy was formulated and this is outlined in the reasoned justification to Policy 2.
6. In summary, when formulating the spatial strategy, the potential supply from a variety of sources and the reasonable alternatives have been assessed, primarily:
  - reviewing existing commitments,
  - maximising urban capacity & optimising density,
  - allowing for small windfalls beyond that included in Local Plans,
  - allowing for 'non-strategic' growth,
  - assessing potential strategic locations, and
  - assessing other sources e.g. empty homes, specialised housing such as Students & C2.

### Existing commitments

7. The four authorities' existing Local Plans make provision for around 61,500 new dwellings at April 2016. This is predominantly on previously developed land (60.23%). There is supporting growth at towns, and villages and also several greenfield strategic locations in existing local plans. When compared to the housing supply figure identified (105,500) there are **up to 44,000 additional dwellings to 2036, that need to be planned for through the JSP spatial strategy.**

**Figure 4: Housing Supply against existing commitments at April 2016.**



**Urban Living -optimising the potential of urban areas**

8. Urban Living is a central plank of the Spatial Strategy which commands a high degree of public support and is a highly sustainable element of the strategy. The four UAs have assessed the potential of existing urban areas to deliver land to meet development needs. In recent years a high proportion of new homes have been delivered on brownfield land in urban areas. Bristol has delivered 45% of the new housing provision across the JSP plan area since 2006, much of it on previously developed land. This process has been aided by new approaches to urban density to optimise quality urban living. This has developed new thinking about the nature of liveable cities and towns and the trends in the type of accommodation we seek. It is recognised that the success will rely on the ability to plan effectively the use of all public services as part of this concept.
  
9. Evidence has identified that through optimising opportunities for development in urban areas, there is the potential for a further 16,200 new homes to be delivered across the plan area. Opportunities for maximising the potential of existing land in urban areas will result from:



## APPENDIX A

- The change of use of non-residential brown field land to residential – where the previous use is no longer required or residential use would result in the more efficient use for the land.
- Identifying land which is currently underused and has potential for residential development or mixed use development.
- Identification of mechanisms to ensure more certainty over the delivery of large windfall sites.
- Increasing the density of development on allocated or existing sites by reappraising and increasing their development potential in line with new thinking on urban living.

### Small windfalls

10. The existing commitments make an allowance for small windfall sites (ie 9 dwellings or below). The JSP also makes an allowance for this component of growth to continue to the end of the Plan period. This contributes around 6,860 dwellings to the JSP strategy.

### Non-Strategic Growth

11. An allowance is proposed to be made for ‘non-strategic growth’ in sustainable locations to accommodate smaller scale development in villages and towns which is needed to enable local communities to thrive. Detailed proposals will be brought forward through each Authority’s local plan. This contributes 3,400 new dwellings to the JSP strategy.

### Strategic Development Locations

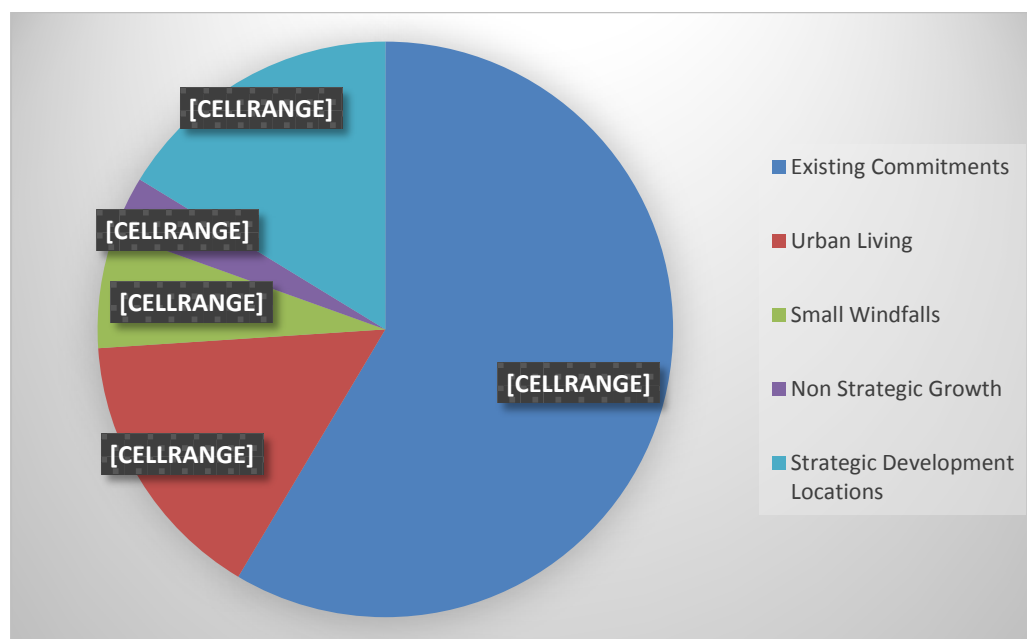
12. Against the supply described above, there is the need to identify land for another 17,600 dwellings in order to meet the housing requirement with sufficient flexibility.
13. Locations which are currently, and are anticipated to be, significant generators of trips include central Bristol, parts of the Bristol North Fringe, central Bath/Bath Enterprise Zone and Weston-super-Mare. However, an approach which focusses on increasing existing urban development opportunities and expansion will not be sufficient to meet the homes and job needs of the Region over the next 20 years. Additional new sustainable locations will be needed which may include new innovative solutions such as garden villages or extensions.
14. The Strategic Development Locations are identified which are capable of delivering large scale development (500 dwellings+) over the plan period in locations which support the spatial strategy. This approach recognises all aspects of sustainability including growth well related to the central areas and other parts of urban areas where people seek to travel for work, shopping and recreational needs.
15. Sustainability is closely related to proximity and accessibility to services and facilities, particularly in Bristol, Bath and Weston super-Mare and the potential to use existing and new transport corridor opportunities. Other sustainability factors to meet the priorities of the Plan have also been considered including rebalancing

## APPENDIX A

economic growth, maintaining and enhancing the environment and retaining the overall function of the Green Belt.

16. There is the need to avoid the unsustainable expansion of the north and east fringes of the Bristol urban area beyond the substantial existing commitments that are identified to be delivered in adopted Local Plans. Evidence also shows that due to significant environmental constraints there is no scope to further expand Bath outwards.
17. Alongside this, it is also recognised that existing towns and larger villages have a role to play in supporting sustainable economic growth. Strategic opportunities have been identified where investment in high profile public transport will assist in delivering sustainable growth.
18. A sizeable proportion (48%) of the West of England area is within the Bristol-Bath Green Belt. This has significant implications for the Spatial Strategy, particularly reflecting the strategic priority to retain the overall function of the Green Belt. The advice in NPPF para 83 is *“Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”*
19. Technical work and transport modelling have shown that it is not possible to sustainably accommodate all the identified growth needs entirely outside the Green Belt. The transport impacts cannot be fully mitigated even with substantial investment. Such a strategy would be dependent on some highly unsustainable locations that are very difficult and expensive to mitigate with only sub-optimal solutions. It would also put pressure to locate development in the flood risk areas. These issues would impact on delivery of such a strategy.
20. In response to concerns expressed through public consultation, the spatial strategy aims to minimise the impact on the Bristol and Bath Green Belt. However, due to the scale of provision required and the extensive nature of the Green Belt, the Plan does include some Strategic Development Locations currently with Green Belt designation as explained in the Spatial Strategy Topic paper. Finally, the opportunity for new free standing garden village settlements forms part of the strategy.
21. A summary of the components of supply in the Spatial Strategy is set out at figure 5.

**Figure 5: Components of supply in the Spatial Strategy**



### Demonstrating Flexibility and Contingency

22. The housing trajectory which sets out the phasing of the supply to meet the identified target is set out at Appendix 1 to the Housing Topic Paper. This shows that the plan has a sufficient flexibility to deliver identified needs across the plan period as well as addressing the requirement to demonstrate a five year land supply. The Plan also has flexibility to assist the market in delivering the identified employment land.
23. To enable delivery and implementation of the identified Objectively Assessed Need of 97,800 dwellings and the housing requirement of 102,200, the authorities have identified a supply of 105,500 dwellings. This is between 5% and 10% over the OAN, thus providing some flexibility should any issues of non-delivery arise. In addition, the JSP identifies a contingency supply (of around 3,000 homes). Release of the contingency will be considered should development not come forward as anticipated. A plan review would be the mechanism to undertake the release of the contingency informed by monitoring of delivery. It is emerging national policy guidance that plans be reviewed after 5 years. This gives an overall potential housing supply within the JSP Plan period of 108,000 new homes (including contingency).

### Mitigations and infrastructure required to support the Spatial Strategy

24. It is recognised that provision of necessary infrastructure up front or phased to support development is critical to the successful delivery of the spatial strategy. Strategic infrastructure that will be required to deliver the Spatial Strategy is included in the Key Diagram at Appendix A.

## APPENDIX A

25. Our transport network has to accommodate an increasing volume of travel and complex travel patterns. Increasing demand has contributed to a network that is often at capacity at peak times, with increased journey times and congestion. These impacts have been perceived as a barrier to securing sustainable economic growth. This threatens not only the productivity of our businesses and workforce but also our ability to meet wider sustainable objectives such as reducing carbon emissions and improving air quality in our urban areas.
26. Transport investment can be a major influence on where development is located and how to create high quality places in which people want to live and work. Influencing the location of development will not of itself be sufficient to address the issue.
27. Integrating housing and employment development with investment in reliable, high quality transport choices will:
- reduce the length and number of journeys to work, and other services and facilities.
  - encourage more sustainable travel modes such as cycling, walking and public transport.
  - reduce the reliance on car based journeys.
28. In response to the spatial strategy, transport infrastructure provision to support the additional development required seeks to:
- maximise the effectiveness of sustainable travel choices and encourage mode shift (to rail, MetroBus, Park & Ride, bus, cycling, walking) across the plan area.
  - maximise the effectiveness of non-car mode choices for both urban living and new development outside existing urban areas; and then
  - mitigate impacts of additional traffic, including investigation of junction capacity improvements, upgrades, new highway connections and traffic restrictions.

### **Encouraging sustainable travel choices across the plan area**

29. **MetroBus** (Bus Rapid Transit) will be central to delivering the shift from a reliance on the car to a public transport mode of transport. Particularly at strategic development locations, and along key corridors with a number of locations outside of walking/cycling distance from key destinations and less-well served by the conventional bus and rail networks;
30. **A network of new Park & Ride and interchange schemes** will help to intercept trips on the edge of Bristol, Bath and Weston urban areas, reduce traffic in these areas and improve conditions for walking, cycling and public transport;
31. **Conventional local bus services and in particular improving existing bus services** will be an important part of promoting sustainable travel on several corridors;

## APPENDIX A

32. **Rail** will play an important role for access to urban centres, but improvements will be needed (capacity, access to stations, parking, station environment, interchanges). Despite impressive levels of passenger growth in recent years rail currently has a modest modal share and is therefore part of a wider package of transport measures. Some locations will remain difficult to serve by rail.
33. **Walking and cycling** must take a central role for shorter trips –creating environments where active travel choices are the first choice, with better links to surrounding walking and cycling networks.

DRAFT

## CHAPTER 4: POLICY FRAMEWORK

## POLICY 1 – THE HOUSING REQUIREMENT

In order to deliver the housing requirement for the West of England of 102,200 homes between 2016 and 2036, the Joint Spatial Plan (JSP) makes provision for the supply of at least 105,500 new homes.

Based on the spatial strategy in Policy 2, the supply will be distributed between the unitary authorities as follows:

- |                                |                  |
|--------------------------------|------------------|
| • Bath and North East Somerset | 14,500 dwellings |
| • Bristol City                 | 33,500 dwellings |
| • North Somerset               | 25,000 dwellings |
| • South Gloucestershire        | 32,500 dwellings |

The Plan also makes provision for contingency supply which, if required would take the total housing supply available over the Plan period to 108,000 as set out in Policy 2.

The 5 year Housing Land Supply assessment will be based on the Housing Requirement of 102,200 and will be set out in the UAs Local Plans.

***Reasoned Justification for Policy 1.***

1. **Housing Requirement:** The Strategic Housing Market Assessments (SHMA) prepared for the West of England evidenced an Objectively Assessed Need (OAN) for housing of 97,800 dwellings (dwellings) for the plan period 2016-2036. This comprises 85,000 dwellings for Wider Bristol Housing Market Area (HMA) and 12,800 dwellings for the Bath HMA).
2. This takes account of changes to net migration, the need to align future jobs and workers, in response to market signals, and to support the delivery of affordable housing. To take account of the needs of older people, the Housing Requirement is 102,200 dwellings for the Plan period as set out in the SHMA update. To allow some flexibility, the JSP makes provision for 105,500 dwellings by 2036.
3. **District distribution:** Policy 1 sets out the broad distribution of the Housing Requirement between the four districts. This is derived from the JSP spatial strategy and the location of committed and proposed housing growth over the plan period. Detailed delivery of the district distribution will be through local plans.
4. In the event that development does not come forward as anticipated, an additional contingency supply of around 3,000 dwellings has been identified as set out in Policy 2.
5. **The 5 year Housing Land Supply** assessment is based on the Housing Requirement of 102,200 dwellings and this will be established for each District through the respective UA Local Plans.

## **POLICY 2 – THE SPATIAL STRATEGY**

**The Joint Spatial Plan housing and job requirements will be achieved through:**

- 1. The delivery of existing Local Plan commitments,**
- 2. Maximising the sustainable development of previously developed land and other appropriate opportunities within existing urban areas,**
- 3. Enabling non-strategic sustainable development at locations identified and brought forward through local plans to meet the UA housing and employment requirements.**
- 4. The allocation in Local Plans of the following Strategic Development Locations:**
  - Bath & North East Somerset: North Keynsham, Whitchurch.**
  - Bristol: Land at Bath Road Brislington**
  - North Somerset: Backwell, Banwell, Churchill, Nailsea.**
  - South Gloucestershire: Buckover, Charfield, Coalpit Heath, Thornbury, Yate.**

**The strategic policy requirements for each of the strategic development locations are set out in Policy 7.**

**The spatial strategy is illustrated on the Key Diagram.**

**The general extent of the Green Belt is maintained except where it is required to be amended through local plans to enable the delivery of the strategic development locations at Coalpit Heath, North Keynsham, Yate, Bath Road, Brislington and Whitchurch.**

### **Contingency/Review:**

**The Plan will be reviewed every 5 years following adoption. If monitoring demonstrates that the planned housing provision, is not being delivered at the levels being planned for and there would be no reasonable prospect of the planned delivery being met, the identified contingency will be considered for release through plan review.**

### **Reasoned Justification for Policy 2**

- 6. Policy 2 sets out the Plan's spatial strategy. The Plan promotes a pattern of development across both Housing Market Areas which most appropriately delivers the Plan's Vision and Strategic Priorities. In particular, it seeks to meet the need for new homes and economic growth supported by the necessary infrastructure. Chapter 3 and Topic Paper x sets out in more detail how the spatial strategy was developed.**
- 7. Development of the strategy has been informed by the Sustainability Appraisal and a broad evidence base.**

## APPENDIX A

8. Provision is made to deliver 105,500 new dwellings and 82,500 jobs by 2036. Of this, a significant proportion, around 61,500 new homes are already identified in existing adopted plans. A principal element of the strategy is to maximise development opportunities in urban areas, whilst securing a high quality environment for existing and future residents. This approach helps to ensure new development is well related to facilities and benefits from existing infrastructure and yields about an additional 16,200 dgs. In recognising the role of the network of smaller towns and settlements provision is also made for 'non-strategic' growth (3,400 dwellings), and small site windfall development (6,800) with locations to be identified in UA Local Plans.
9. The above provision leaves nearly 17,600 dwellings to be accommodated. Whilst all brownfield options have been considered the identification of strategic, greenfield locations (500 or more dwellings for the purposes of the JSP) is warranted. Topic Paper x describes in more detail how the potential Strategic Development Locations (SDLs) have been identified.
10. A number of spatial scenarios were tested in order to establish the most appropriate strategy and help select the strategic locations which would effectively deliver the Plan's priorities. The preferred approach is to achieve a balanced portfolio, which in combination focusses development at locations: well related to existing urban areas; which are served by existing sustainable transport routes; or those with the potential to be sustainable, as a result of the type and form of development proposed. This reduces the need for travel to facilities and employment and where travel is needed, to do it more sustainably. In particular it facilitates the priority of economic rebalancing, thereby helping to address the pockets of deprivation within the sub-region. The preferred locations have also take account of the need for the spatial rebalancing of the Bristol city region in response to the extensive past growth and build out of the existing commitments which remain (of some 13,000 homes) at the north and east fringes of Bristol over the next 10 to 15 years.
11. A substantial part of the sub-region (around 48%) lies with the Bristol- Bath Green Belt. This creates a tension as some of the most sustainable (or potentially sustainable) locations in terms of their proximity to the Bristol urban area are within the Green Belt. The UAs assessed the scope to meet the need for development by avoiding Green Belt locations, including options in adjoining Authorities. However, the avoidance of the Green Belt resulted in a strategy which would entail highly unsustainable patterns of development, would have significant delivery issues and would severely compromise the Plan's objectives.
12. Having examined the other reasonable options for meeting the identified development requirements, the UAs have concluded that there are exceptional circumstances to justify the release of certain locations from the Green Belt. In doing so, the UAs have sought to minimize the impact on the Green Belt and its general extent remains unchanged, with 0.65% proposed to be removed.



## APPENDIX A

13. The JSP provides the basis for the UAs to formally allocate the SDLs in their individual Local Plans. Local Plans will set out the detailed site requirements, delivery arrangements and facilitate mitigation and/or enhancements both on site and off site. Local Plan preparation will provide the mechanism to amend local Green Belt boundaries. In the meantime, these locations will remain as part of the Green Belt. Opportunities to extend Green belt will be explored through local plans such as at Thornbury/ Buckover and Nailsea/Backwell.
14. The strategy provides a robust supply of deliverable land for housing for the Plan period with a choice of locations and flexibility to respond to changing circumstances. The strategy provides a firm basis for the UAs to demonstrate a 5 year housing land supply in each UA Local Plan, based on the identified Housing Requirement.
15. The plan will be reviewed at 5 year intervals to ensure that the strategy is being delivered and to take into account new evidence. In the event that housing was not being delivered at the levels being planned for and if there would be no reasonable prospect of the planned delivery being recovered, the Plan identifies some contingency locations to be considered for release through Plan review. This contingency comprises;
  - Land south of Chipping Sodbury, (around 1,500 dwellings with up to 775 deliverable within the Plan period) and an additional 225 dwellings at North West Yate, South Gloucestershire.
  - Land at east Clevedon, North Somerset (around 1,500 dwellings)
  - Increased non-strategic growth in South Gloucestershire (around 500 dwellings) and in B&NES (100 dwellings)
16. The spatial strategy, as shown in the Key Diagram below, enables the identified growth needs of the West of England to be met in a sustainable and deliverable way, properly aligned with new infrastructure and with flexibility. It enables the retention and enhancement of the sub-region's high quality environment, provides benefits to existing communities and it facilitates the development of exemplar, sustainable new places. This is the most appropriate strategy for the West of England as evidenced through Sustainability Appraisal (SA) testing and in effectively delivering the Plan's spatial priorities.

**POLICY 3 – THE AFFORDABLE HOUSING TARGET**

- 1. The Affordable Housing Target for the West of England for 2016-2036 is 24,500 net new affordable dwellings. Delivery of Affordable Housing, in a range of tenure and unit types, is a significant priority in all residential development.**
- 2. Affordable Housing is defined as social rented, affordable rented and intermediate housing provided to households whose needs are not met by the market with regard to local incomes, house prices and rents.**
- 3. On residential developments delivering 5 or more dwellings or sites larger than 0.2ha, whichever is the lower, a minimum target of 35% Affordable Housing to be delivered on site is required. This applies to both C3 and self-contained C2 residential developments, including older persons and student accommodation.**
- 4. Every opportunity will be taken to maximise the delivery of affordable housing within Bristol. The provision of Affordable Housing on the SDLs, and other strategic locations within or well related to the Bristol urban area, must contribute to the Affordable Housing need of Bristol through on site provision, with the option for off-site contributions in locations less well related to Bristol. Offsite contributions will be retained for the delivery of Affordable Housing for Bristol for a maximum of ten years or to the end of the JSP period whichever is the later.**
- 5. Where it is demonstrated that viability prevents the delivery of Affordable Housing policy requirement without public subsidy, the agreed quantum of Affordable Homes to be delivered without subsidy will be stipulated in the planning agreement. In these circumstances any reduced provision of Affordable Housing must still contribute to the affordable housing need of Bristol as set out in paragraph 4. Further mechanisms will be used to require the applicant to engage actively with the local authority to identify alternative forms of investment or public subsidy to deliver Affordable Homes above this base provision up to policy compliant, target levels.**
- 6. All Affordable Housing tenures should include provision to remain at an affordable price in perpetuity for future eligible households (based on local incomes and house prices) or for the subsidy to be recycled for alternative affordable provision.**

## APPENDIX A

17. The Wider Bristol and Bath SHMAs identified an Affordable Housing need of 32,200 net new dwellings. Based on the Affordable Housing supply, available funding and other interventions an additional 24,500 (76%) Affordable Homes is set as the strategic target of this plan.
18. Affordable Housing is given a significant priority in the plan because of the scale of the need and historic low delivery rates. The target reflects the commitment by the Unitary Authorities to maximise Affordable Housing delivery across the West of England.
19. It will achieve this by:
  - Requiring a minimum of 35% Affordable Housing on all sites delivering 5 or more dwellings or sites larger than 0.2ha, whichever is the lower. This is justified by the high level of need and the shortfall in past delivery, and the consequent need to maximise delivery from all possible routes.
  - Maximising delivery via planning policy on site at nil public subsidy.
  - Maximising delivery via planning policy at nil public subsidy on the Strategic Development Locations (see Policy 7) as a specific priority.
  - Requiring policy compliance with the expectation that where it is unviable to provide the full policy requirement at nil public subsidy, public subsidy or other forms of investment will be sought and secured to make up the shortfall in order to demonstrate that every effort has been made to deliver full policy compliance.
  - Maximising use of HCA funding, other public subsidy and other forms of investment.
  - Requiring AH to be provided that meets the needs as evidenced by the Wider Bristol and B&NES Strategic Housing Market Assessments 2016 update or further updated evidence, in the full range of AH tenure types and unit mixes.
  - Maximising delivery through higher densities in urban locations.
  - Maximising delivery by reviewing and where appropriate, bringing forward sites for affordable housing that are currently allocated for other uses.
  - Requiring AH to be provided on self-contained C2 residential accommodation, including older persons housing and student accommodation, justified by the high level of need and the shortfall in past delivery, and the consequent need to maximise delivery from all possible routes.
  - Requiring on-site delivery of Affordable Housing. In exceptional circumstances, where it can be robustly justified, off-site provision or an equivalent financial contribution in lieu of on-site provision may be acceptable, for the provision of affordable housing.
20. In light of the particularly substantial need for Affordable Housing in Bristol, the provision of AH on the SDLs and other strategic locations within or well-related to the Bristol urban area must contribute to the affordable housing needs of Bristol via on-site provision with the option of off-site contributions in locations less-well related to Bristol. Delivery mechanisms will be determined through a Joint Supplementary Planning Document options to be explored will include:
  - nomination rights.

## APPENDIX A

- financial contribution to be held in a West of England Housing central fund and which can be retained for a maximum of ten years or to the end of the JSP period, whichever is the later, in order to maximise the opportunity to spend.
21. The 4 UAs have sought to maximise the provision of AH as far as possible, making it a priority in the formulation of the spatial strategy and increasing the overall supply of housing in order to increase AH supply. Whilst the identified needs for AH will not be fully met, this strategy will entail a substantial boost in the supply of Affordable Housing for the sub-region and will result in a step change in provision.

DRAFT

## **POLICY 4: THE EMPLOYMENT LAND REQUIREMENT**

The Joint Spatial Plan (JSP) supports the delivery of 82,500 additional jobs in the West of England between 2016 and 2036. The Plan seeks to enable access to employment opportunities for all through the spatial distribution of development.

Development in the following key strategic employment locations will ensure the continued economic growth of the West of England. The locations include:

### **Existing city and strategic town centres**

- Bristol City Centre
- Bath City Centre, and
- Weston-super-Mare Town Centre

### **Enterprise Zones and Areas**

- Temple Quarter Enterprise Zone
- Avonmouth Severnside Enterprise Area
- Filton Enterprise Area
- Emersons Green Enterprise Area
- Bath Riverside Enterprise Zone
- Somer Valley Enterprise Zone
- Junction 21 Enterprise Area, Weston-super-Mare

### **Key strategic infrastructure employment locations**

- Bristol Port,
- Bristol Airport,
- Oldbury Power Station new nuclear build.

Additional employment opportunities are provided throughout the West of England in town, district and local centres, business and industrial estates.

These contribute to the stability of the sub-regional economy, and maintenance of employment land in these locations will be addressed through policy set out in the Local Plans. Improved accessibility to employment for residents in south Bristol, Bath and Weston-super-Mare will be supported through investment in sustainable transport infrastructure.

### **Strategic Development Locations (SDL)**

In order to support the delivery of the employment growth required in the West of England, new employment land may be identified at the SDLs. The amount of employment land provided for at the SDLs will respond to the amount of residential development proposed and the context and scale of any existing community in the area. The delivery of employment land in the SDLs will be secured through allocation and policy detail in Local Plans, and through master planning and Supplementary Planning Documents as appropriate.

### Reasoned Justification for Policy 4

22. In order to support the continued economic growth of the West of England, the area will need to be able to accommodate an additional 82,500 jobs (c.69,400 Full Time Equivalents) between 2016 and 2036 (all use classes not just B Class use). This figure has been derived from the 2015 Medium High growth forecasts from Oxford Economics with a small uplift of 1.1%.
23. The growth in jobs will be supported by the portfolio of employment opportunities available across the West of England. The continued changes in the employment market mean that flexibility is required within the employment land portfolio, in order to respond to changes in market demand during the plan period and beyond.
24. The employment land requirement to support the delivery of employment growth has been assessed, and the Economic Development Needs Assessment (EDNA) has identified that existing employment land is sufficient to deliver strategic employment needs, and the anticipated jobs growth over the period to 2036. Whilst the EDNA identified some localised mismatches between supply and demand for example in some parts of the WoE such as the Avonmouth / Severnside area, within the single functional economic market of the West of England, the opportunities to satisfy economic and employment land needs exceed the requirements of the highest employment job forecasts. Although additional jobs will be delivered from the full range of employment types, the EDNA deals only with provision for office, industrial and warehouse uses ('B' class uses. This is consistent with the requirements of the NPPF and national PPG).
25. The employment potential of the strategic employment locations will continue to be reviewed to inform detailed policy formulation through each authority's Local Plan. The strategic focus for the increase in employment opportunity will primarily be within the Enterprise Zones and Enterprise Areas.
26. The overall strategy is to focus growth in City Centres and EZs which are sustainable locations and are successful business locations.
27. Whilst major growth in employment is targeted at these areas, additional growth opportunities for Port, airport and power station related activities, are recognised at 3 key strategic infrastructure employment locations, Bristol Airport in North Somerset and Bristol Port in North Somerset/Bristol, and Oldbury Power Station in South Gloucestershire. This is in response to the evidenced employment growth potential at these locations. Growth at Bristol Airport has the potential to create a range of new employment opportunities. However, significant growth in this location will require the delivery of improved public transport access from Bristol and Weston-super-Mare. In addition, the construction of Hinkley Point C in Somerset, though outside the plan area, will have a significant impact on business supply chains and labour markets across the West of England (e.g. as demonstrated by location of EDF headquarters at Bridgwater House, Bristol).
28. The Strategic Development Locations where appropriate provide for employment land, proportionate to the scale of development proposed and the proximity of the development to other employment provision, and local employment need. The detailed capacity of the SDLs may be further tested in the preparation of the Local

## APPENDIX A

Plans. Although there will continue to be growth opportunities throughout the West of England as a result of intensification of activity within existing local business and industrial estates, there are constrained opportunities for new employment land in south Bristol.

29. 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.
30. Additional employment opportunities are provided throughout the West of England in town, district and local centres, business and industrial estates. These contribute to the stability of the sub-regional economy, and maintenance of employment land in these locations will be addressed through policy set out in the Local Plans.

DRAFT

**POLICY 5: PLACE SHAPING PRINCIPLES:**

**All new development must contribute towards the delivery of high quality and sustainable places. The following key principles should be used to inform the development and delivery of high quality and sustainable places to:**

- 1. Create character, distinctiveness and sense of place which diversifies the residential offer, improves accessibility, affordability and enhances identity.**
- 2. Improve health and wellbeing and enable independence, reduce health inequalities, and facilitate social interaction where people can meet to create healthy, inclusive and safe communities.**
- 3. Enable inclusive and sustainable economic growth.**
- 4. Ensure the protection and enhancement of the natural, built and historic environment.**
- 5. Mitigate and adapt to climate change and use a catchment based approach to water management.**
- 6. Minimise energy demand and maximise the use of renewable energy, where viable meeting all demands for heat and power without increasing carbon emissions.**
- 7. Provide and ensure access to infrastructure including public transport, which reduces reliance on use of cars.**
- 8. Maintain and enhance the Green Infrastructure network to deliver multiple benefits for people, place and the environment.**

**These Key Principles should be used to prepare the Strategic Development Locations (identified in Policy 2 and 7) concept frameworks and future master planning to be identified in local plans or other documents to secure a co-ordinated and comprehensively planned approach. They should also be used to support existing communities to ensure the delivery of sustainable urban living and regeneration led development.**

**The West of England local authorities through their local plans will build good working relationships with developers, infrastructure providers other agencies and local communities to achieve these key principles.**

**Reasoned Justification for Policy 5.**

- 31. Place making is at the heart of achieving our ambition for the West of England for places that are environmentally, socially and economically sustainable. To support this, the Plan's vision and spatial strategy recognises the importance of working on key issues across boundaries whilst seeking to respect the character and identity of our individual communities and to make places more innovative, competitive, connected, diverse and healthy.**
- 32. To achieve these key objectives requires the leadership, ambition and co-operation of public, private and voluntary sectors. This is critical in order to shift expectations,**



## APPENDIX A

perceptions and devise new delivery models. To support this, key principles have been developed that ensure the JSP incorporates strategic priorities for economic, environmental and social sustainability. These accord with the 3 pillars of sustainable development and are intended to articulate the West of England's ambition and focus for creating high quality places that fulfil and realise these objectives.

### **Social**

#### *Policy Principle 1: Create character, distinctiveness and sense of place*

33. The design, diversity and nature of housing in new developments is critical to their attractiveness as places to live and in establishing successful new communities. New development will demonstrate a high standard of design appropriate to their location. This should be inclusive enabling accessibility and independence helping to reduce health inequalities. A mix of housing typologies and tenures have a role to play in diversifying the residential offer, improving accessibility and affordability and enhancing identity and sense of place. This can link to new models of housing delivery provided by new small and medium sized enterprises (SMEs), such as self and custom build and build to rent. Projects at higher density and scale provide the potential for generating community energy and can help to alter perceptions about an area.
34. Having a sense of place requires that new development provides a clear sense of scale, density, and legibility, has strong landscape and multi-functional green and blue infrastructure features and the provision of a range of amenities and services. Connection to sustainable transport networks are important so that locations are accessible by means other than car travel. New development should provide places of interaction with, diverse local economies and a good standard of service provision such as education. In order to take this work forward, the WoE authorities will prepare an Urban living Supplementary Planning Document (SPD) to set out these principles.

#### *Policy Principle 2: Improve health and wellbeing, reduce health inequalities, and facilitate social interaction where people can meet to create healthy, inclusive and safe communities.*

35. The planning, design and management of places and homes has an impact on the health of both current and future generations. New development and infrastructure provide opportunities to improve public health and access to healthcare services. Such improvements can be direct, for example the installation of smart technology for independent living; or indirect by impacting on behaviour, for example provision of active travel options, improving safety and creating accessible spaces to encourage physical activity. The reduction of obesity by raising levels of physical activity has been shown to lessen the risk of physical and mental health issues and costs to health service providers.
36. Health inequalities, social opportunity and quality of life are differences between people or groups due to social, geographical, biological or other factors. These differences can have a huge impact, resulting in some people and groups experiencing poorer health and shorter lives. Development proposals must be

## APPENDIX A

informed by a holistic and evidence-based approach which considers how the current and future health needs of the population can inform the design and planning of new places.

37. Development proposals should:

- be planned to integrate transport and land use and recognise the opportunity to offer a variety of services and facilities including access to green space and nature. This includes places for leisure, social activity and business space and places, both inside and out, where people can interact.
- be fit for the future, incorporate alternative sources and resilience to a more variable climate.
- Support strong, vibrant and healthy communities, by creating clear urban design with a diversity of housing, flexibility of building uses and sufficient space for cycle paths and walkways, to the community's needs and support its health, social and cultural well-being.

### **Economic**

#### Policy Principle 3: Enable inclusive and sustainable economic growth

38. The availability of land for business activity is important to the long-term sustainability of both our existing and new communities, as well as the performance of the local economy. Where development potential is identified, there is a risk that employment uses will be pushed out by the need for new homes and the values generated by residential development. However, whilst land should not be protected for employment use where there is little prospect of such use occurring, it is important that adequate provision for future change is made. This does not simply require the right quantum of floorspace but the provision of premises that can support a strong and productive economy.
39. To achieve this requires diversity of economic activity, enable business interaction and the retention and attraction of staff, provide for a range of flexible building types, including working from home. Development proposals should enable flourishing and successful economies by allowing for ideas to be generated, tested, developed and turned into services and products.
40. Where appropriate new employment opportunities should be provided at the strategic development locations with the form and type of development to be determined through local plans and SPD as appropriate.

### **Environment**

#### Policy Principle 4: Ensure the protection and enhancement of the natural, built and historic environment

41. The West of England is bounded by natural features of international and national importance – the two limestone landscapes designated for their outstanding natural beauty - the Cotswolds AONB lies to the east and the Mendip Hills AONB to the south, the Severn Estuary is an international wetland habitat. A plethora of international and national sites of ecological importance also exist throughout the

## APPENDIX A

WoE, that are not confined to these landscapes. Topic Paper x sets out these assets. The West of England's numerous historic sites and features contribute significantly to the distinctiveness and sense of place of many communities.

42. These natural, built and historic environments provide a wide range of services that benefit our economy, and encourage visitors to the region whilst also providing health related benefits to our residents. Therefore it is crucial that new development works with natural systems, and is responsive to the distinctive historic and landscape setting of the sub region.
43. By working closely with our key environmental partners we have sought to establish a strong evidence base against which to recognise the wider benefits of ecosystem services, providing net gains to biodiversity, ensure areas of high landscape and visual sensitivity are respected, and the historical environment is conserved and enhanced. This will be used to ensure new development will:
  - Conform with planning legislation to ensure protection of Local to International designated sites (AONB, SNCI, SSSI, SAC, SPA, Ramsar sites) and should ensure enhanced protection through complimentary habitat creation to extend and/or buffer the site, implemented through the delivery of green infrastructure corridors.
  - Be expected to contribute towards a net gain of the sub-regions diverse and high quality natural environment and biodiversity ensuring that new development creates high quality sustainable places that deliver the integration, enhancement and protection of the sub-regions environmental assets.
  - Encourage opportunities to take a landscape-scale approach to improve the natural environments resilience and optimise the services they provide as demonstrated through the Severnside Wetlands Nature Improvement Area (NIA) and Bristol Avon Catchment.
  - In delivering Strategic Development Locations, policy requirements will incorporate provision for multi-functional green infrastructure as mapped in the Strategic Development Locations framework diagrams.
44. The vehicle to deliver an assessment of the West of England's key environmental assets will be delivered through a Green Infrastructure Plan for the West of England, supported by the 4 Unitary Authorities. The scope is set out in Topic Paper x.

*Policy Principle 5 – Mitigate and adapt to climate change and use a catchment based approach to water management.*

45. All development proposals will be required to demonstrate how long term climate resilience has been taken into account in the location and design of new development.
46. To increase resilience of the water environment to tidal, fluvial and surface water flooding the West of England authorities are committed to work in partnership on a

## APPENDIX A

catchment wide basis to achieve more holistic outcomes focused on multi-benefit projects across our administrative boundaries. A clear strategic priority is to increase investment opportunities for delivering improvements and adaption measures for water-based issues across the whole of the water catchment that falls within the Plan area, identifying new funding and delivery mechanisms to deliver positive change. These include reduced sedimentation of watercourses and associated maintenance costs, reduced risk of flooding and enhancement of the wider environment to improve the public realm through soft engineering solutions.

47. There is a need to work with wider partners including the EA and water companies to address adaption measures to respond to impacts such as drought and water shortages through schemes to manage water consumption. In working with wider partners development should positively contribute to managing the water environment by implementing a sustainable drainage strategy that adopts a catchment based approach to water management and which is integrated with the green infrastructure objectives to provide resilience against flooding.
48. To meet these objectives, the four West of England authorities will support the catchment wide action plan and its implementation.

*Policy Principle 6: Minimise energy demand and maximise the use of renewable energy, where viable meeting all demands for heat and power without increasing carbon emissions:*

49. The West of England Unitary Authorities are committed to improving energy security, address fuel poverty and to achieve an efficient low carbon economy. In addressing these challenges it is important for the West of England Authorities to contribute to and support the increased use and supply of renewable and low carbon energy in line with objectives and provisions of the Climate Change Act 2008, 2050 Carbon neutral targets. As such, the combined West of England CO2 reduction target is to reduce absolute CO2 emissions by 50% by 2035 from a 2014 baseline.
50. The scale of proposed development to be delivered through the JSP could generate significant additional CO2 emissions, making it harder to reach this target. To mitigate this, it will be necessary to maximise the energy efficiency of new development and integrate renewable energy technologies to supply the energy needs of new development in order to minimise energy demand. Technology continues to advance whilst costs fall and it is more cost effective to deliver efficient new buildings with renewable energy integrated from the outset than to retrofit them once they are built.
51. Through the production of the new Local Plans and supporting SPD, the potential for development to be built to a zero carbon standard, that is net zero emissions from regulated and unregulated heat and power, will be investigated using a

## APPENDIX A

consistent methodology across all four Unitary Authorities. Where viable, policies requiring zero carbon development or development that produces more renewable energy than it uses through opportunities including heat networks and other measures to support the delivery of environmentally sustainable development will be considered for inclusion in Local Plans.

### ***Infrastructure:***

#### *Policy Principle 7 Provide and ensure access to infrastructure including public transport, that reduces reliance on use of cars*

52. Strategic development should be in locations which maximise the potential to reduce the need to travel or, where travel is necessary, maximise opportunities to travel by sustainable, non-car modes, especially walking and cycling or be in places accessible to existing or new high quality public transport links. The focus of new transport infrastructure should address both existing challenges and create capacity for sustainable growth. New developments should also ensure that safe vehicle access is secured and appropriate local highway mitigations are identified and delivered.
53. Development should make provision of community infrastructure necessary to support the new development including provision of retail, education, health and sport and leisure. New services and facilities should be integrated with existing provision where appropriate.

#### *Policy Principle 8 Maintain and enhance the West of England's Green Infrastructure network to deliver multiple benefits for people, place and the environment*

54. Strategically planned and designed new green infrastructure and enhancing the existing green and blue infrastructure can provide a broad range of economic and social benefits that underpins the JSP's vision for sustainable growth.
55. In assessing the JSP Strategic Development Locations the four Unitary Authorities have taken account of the eight cross cutting Green Infrastructure objectives. Through the assessment of Green Infrastructure for the JSP strategic development locations, a framework for assessment has been created. This is intended to provide for a well-integrated, multifunctional public open space and green infrastructure network to provide a full range of formal and informal recreation opportunities (including allotments) and to help ensure the setting of local heritage and ecological assets are protected and enhanced.
56. This framework will help inform local plans to enable consistency within the design of all new development (urban living and non strategic as well as the SDLs), ensuring multi-functional green infrastructure objectives are incorporated and delivered.
57. Taking this work forward, the 4 West of England Unitary Authorities will devise and deliver a Green Infrastructure Plan (as referred to in principle 4) which will identify

## APPENDIX A

the West of England's key natural assets and the mechanisms for investment in those assets. It is envisaged that the Green Infrastructure plan will be the basis for identifying opportunities for enhancing and delivering Green Infrastructure and ecosystem services, both on and offsite, and prioritisation for large scale conservation management.

58. Through the delivery of a West of England Green Infrastructure Plan and Local Plans, issues will be addressed on a coordinated and strategic level, including any potential significant effects on Natura 2000 sites.

DRAFT

**POLICY 6 STRATEGIC INFRASTRUCTURE REQUIREMENTS**

**Strategic infrastructure will be required to support the effective implementation of the Joint Spatial Plan Spatial Strategy.**

**Transport infrastructure:**

**Working with delivery partners, the strategic transport infrastructure identified on the Key Diagram and in the West of England Joint Infrastructure Delivery Programme will be provided within the period 2016-2036.**

**Priority will be given to schemes which support the delivery of the spatial strategy as set out in Policy 2.**

**Provision will be made in the Local Transport Plan and local plans for an integrated corridor-based approach to transport improvements which supports sustainable and active travel choices and maximises the effectiveness of non-car modes.**

**Other strategic infrastructure:**

**New development must be properly aligned with the provision of the necessary strategic infrastructure. Additional strategic infrastructure identified to support the delivery of the spatial strategy is future investment in strategic flood management infrastructure at Avonmouth / Severnside, and on the River Avon in relation to Bristol City Centre. This is indicated on the Key Diagram. Other infrastructure will be identified where appropriate in the WoE Joint Infrastructure Delivery Programme and will be identified through local plans and local infrastructure delivery programs.**

**Reasoned Justification for Policy 6**

59. The policy identifies the strategic development infrastructure requirements which are identified as being required during the plan period to deliver the spatial strategy. These are identified on the Key Diagram and set out in the Infrastructure Delivery Programme. These are the critical transport requirements, flooding and drainage improvements and mitigations. Energy infrastructure to support low carbon development and resilience to climate change such as the Avonmouth / Severnside Heat Network, with cross-border network requirements, will also come forward.
60. The requirement for an effective network of green infrastructure will be set out in local plans and other policy guidance and delivered through an integrated approach to new development. Other more localised infrastructure will also be required and this will be identified through local plans.
61. A WoE GI plan will identify and help to secure any GI required to support the delivery of the JSP and local plans. This would include addressing any potential significant effects on Natura 2000 sites, and other designated sites.

## APPENDIX A

62. Delivery of the strategic infrastructure in the Infrastructure Delivery Program will be ensured through joint working with delivery partners including Natural England, Environment Agency, Highways England, Network Rail, utilities companies and developers. The local authorities will explore a range of delivery mechanisms including the use of compulsory purchase powers (CPO) to make sure that essential infrastructure is delivered in step with new development.
63. Priority will be given to infrastructure delivery which is most effective in delivering the overall spatial strategy and, for example, tackling existing transport challenges, not just in respect of the new strategic development locations, but within the urban areas and at non-strategic locations across the plan area. Where infrastructure provision has cross-border or wider implications, the Unitary Authorities will work together to deliver the most effective solution through, for example, shared use of resources.

DRAFT



## **POLICY 7 - STRATEGIC DEVELOPMENT LOCATIONS SITE REQUIREMENTS**

The following Strategic Development Locations will be delivered during the plan period:

- Bath and North East Somerset: North Keynsham, Whitchurch.
- Bristol: Land at Bath Road, Brislington.
- North Somerset: Backwell, Banwell Garden Village, Churchill Garden Village, Nailsea.
- South Gloucestershire: Buckover Garden Village, Charfield, Coalpit Heath, Thornbury, Yate.

The guiding principles common to all the strategic development locations are set out in Policy 5 and the detailed location-specific requirements are set out in Policies 7.1 - 7.12.

The broad locations for the Strategic Development Locations are shown indicatively on the Key Diagram.

### **Reasoned Justification for Policy 7**

64. As part of the overall spatial strategy to deliver the housing needs for the plan area, strategic development locations (ie locations capable of accommodating 500+ dwellings) have been identified for detailed assessment through local plans. These comprise 12 locations which are consistent with the sustainable development objectives of the Plan but also represent a variety of different areas and forms of development which will provide flexibility and choice over the plan period.
65. The broad locations for the strategic development locations are shown indicatively on the Key Diagram. The Joint Spatial Plan does not allocate these areas; it indicates their general extent which will be further assessed and refined through local plans. In order to provide strategic guidance for the detailed work to follow, the Joint Spatial Plan summarises the development principles, opportunities, constraints and infrastructure requirements to be taken into account. This includes the generic development principles which apply across the whole plan area, particularly the place-shaping principles set out in Policy 5, and also other aspects such as affordable housing targets contained in Policy 3. These principles apply equally to the Strategic Development Locations as well as to other locations.
66. While the starting point will be compliance with the broad principles set out in the main body of the Joint Spatial Plan, it is important to recognise that the individual locations will also have specific local issues, constraints and opportunities to take into account. These are important in terms of ensuring the retention and enhancement of local character and distinctiveness, and ensuring that necessary

## APPENDIX A

infrastructure and other mitigations are introduced in an appropriate and timely manner.

67. Policies 7.1 – 7.12 set out the bespoke requirements for each location which will form the starting point for their detailed assessment through the local plans. These are derived from the evidence prepared as part of the plan-making process and summarised in the supporting documents, particularly the Strategic Development Location templates. The requirements identified in the Joint Spatial Plan policies are not exhaustive and will evolve as detailed assessment and masterplanning takes place at these locations.
68. While the trajectories need to be further refined as the proposals are developed in more detail, the 12 Strategic Development Locations are currently anticipated to deliver approximate 17,377 dwellings by 2036, with the capacity for a further 4,350 beyond the plan period. In many locations delivery is linked to the delivery of essential infrastructure, particularly highways and transport. This means that in several of the identified locations development is not anticipated to commence until later in the plan period.

DRAFT

**POLICY 7.1 - NORTH KEYNSHAM****North Keynsham, Bath & NE Somerset**

Development at North and East Keynsham is shown on the Key Diagram. Development in this area should comply with the following key strategic principles and infrastructure requirements:

- The delivery of around 1,500 new homes, with 1,400 homes built in the plan period, optimising densities and including affordable housing.
- Include around 50,000 m<sup>2</sup> of employment floorspace.
- Creation of a new local centre to provide a focal point for the new community with an appropriate range of small-scale retail, services and facilities.
- A new primary school on site and financial contribution to the provision of a secondary education provision off site.
- New mixed tenure marina providing residential and leisure moorings.
- A layout and form that produces a high quality of urban design, contributes positively to local character and distinctiveness, and that mitigates impact on sensitive views (including key views from the Cotswolds Area of Outstanding Natural Beauty). This should incorporate a well-integrated, multifunctional green infrastructure network that includes new wetland features, restored floodplain meadows and new woodland.
- Provision of key transport infrastructure including:
  - i. North Keynsham multi modal link from Avon Mill Lane to A4. This new link will be designed as a street through the development, considering the needs of pedestrians, cyclists, public transport and vehicles, and capable of performing a wider strategic function for traffic relief in Keynsham. Development will have a positive relationship with the link road;
  - ii. Pedestrian and cycle connections in all directions which link the site with key services and facilities. These include Keynsham rail station, the town centre, the A4 public transport corridor, the A4175 Keynsham Road and the Bristol to Bath cycle path with the potential for new bridge connections across the River Avon;
  - iii. Where existing vehicle routes across the railway line are no longer required for continued use by motor traffic, seek to downgrade them to pedestrian and cycle only links;
  - iv. Metrobus (high quality public transport) route from Bristol to

**Keynsham on the A4 corridor;**

- v. High frequency local bus service following an orbital route connecting the site to the town centre, Metrobus, rail and other local bus services;**
- vi. Improved passenger facilities at Keynsham rail station;**
- vii. Off-site junction improvements including at Hicks Gate; and**
- viii. Expanded or relocated A4 Bristol Park & Ride.**

**No housing will be completed at the North Keynsham SDL ahead of the Avon Mill Lane to A4 link, Keynsham rail station improvements and Metrobus (high quality public transport) route from Bristol to Keynsham on the A4 corridor being completed. This should not prejudice a full Transportation Assessment which will be required for each location.**

DRAFT

## POLICY 7.2 – WHITCHURCH

**Whitchurch, Bath & North East Somerset**

The development of land at Whitchurch is shown on the Key Diagram. Development in this area should comply with the following key strategic principles and infrastructure requirements:

- Around 2,500 new homes, optimising densities with 1,600 homes built in the plan period, including affordable housing.
- Provide retail, healthcare and community facilities, two new primary schools and a secondary school.
- Deliver environmental enhancements to Whitchurch village and its local centre.
- Retain the open gap between Whitchurch village and the Bristol urban area.
- Include employment spaces at a quantum and of a type to be determined through the Local Plan.
- Preserve and/or enhance the Queen Charlton Conservation Area, and the Maes Knoll and Wansdyke Scheduled Monuments and their settings.
- Provision of key transport infrastructure including;
  - i. Multi-modal link connecting A4, A37 and the south Bristol link road;
  - ii. Park and ride provision;
  - iii. Metrobus (high quality public transport) route from Bristol on the A4-A37 link;
  - iv. Pedestrian and cycle connections in all directions which link the site with key services and facilities. These include extending and improving walking and cycling routes to Bristol, Keynsham and to the countryside to the south; and
  - v. Off-site junction improvements including at Hicks Gate.

No dwelling will be completed at the Whitchurch SDL ahead of:

- i. Park and Ride, and
- ii. the multi-modal link A4-A37-south Bristol link including as a prerequisite, the Callington Road scheme being completed.

The strategic infrastructure listed above should not prejudice a full Transportation Assessment which will be required for each location.

**POLICY 7.3 – LAND AT BATH ROAD, BRISLINGTON****Bath Road, Brislington, Bristol**

The relocation of Brislington Park & Ride to land near Hicks Gate Roundabout within Bath and North East Somerset will enable the creation of a new neighbourhood within Bristol. Development in this area should comply with the following strategic principles and infrastructure requirements:

- Provision of at least 750 new homes;
- Mix of uses to be provided in accordance with masterplanning process;
- Retention and incorporation of hedgerows into development, including the hedgerows along Scotland Lane;
- The Sustainable Drainage Systems (SuDS) strategy will include surface water runoff management measures to remediate existing issues on the Scotland Bottom watercourse and Scotland Lane;
- Provision of a linear recreational park incorporating Scotland Bottom watercourse to allow for maintenance of the watercourse and the protection and enhancement of nature conservation. The park should include walking and cycling routes;
- Avoidance of unnecessary sterilisation of coal resources within the Minerals Safeguarding Area;
- Financial contributions to the provision of primary school places off site;
  
- The provision of key transport infrastructure in advance of development including;
  - i. Relocation of Brislington Park & Ride to land near Hicks Gate Roundabout within Bath and North East Somerset;
  - ii. Callington Road Link / A4 Rapid Transit Scheme;
  - iii. Widening of the A4 strategic road network corridor to provide public transport infrastructure inbound and outbound, and an adjacent strategic greenway providing walking and cycling paths with links across Bath Road, and a landscape frontage alongside the A4;
  
- Other transport improvements:
  - iv. A4 – A37 link, which may incorporate a MetroBus route;
  - v. Review the use of Scotland Lane, in light of delivering the A4-A37-south Bristol link, to reduce through traffic and provide walking and cycling facilities
  - vi. Extending and improving cycle routes to Bristol, Keynsham, and to the countryside to the south.

**POLICY 7.4 - BACKWELL****Backwell, North Somerset**

Land to the west of Backwell is shown indicatively on the Key Diagram as the broad location to accommodate an extension to the village. The key strategic principles and infrastructure requirements are as follows:

- Delivery of an extension to Backwell village to create a sympathetic and well-designed development appropriate to its rural setting of around 700 dwellings including affordable housing.
- Lower densities will be expected on more sensitive parts of the site, including to safeguard heritage and ecological assets.
- Creation of new footpath and cycleways linking the site to the rail station, proposed MetroBus connections and local services and facilities.
- Improvements to the rail station to create a multimodal interchange including enhanced parking, facilitating increased frequency and capacity, accessibility and accommodating a MetroBus interchange.
- Local junction improvements will be required including at Station Road, and the A370 Backwell signalised junction.
- Provision of a primary school of at least 2.4ha to be located to maximise safe access from surrounding communities by walking and cycling.
- Protection of the settings of historic Chelvey and West Town Conservation Area and the need for sensitive treatment in respect of the setting of Grove Farm.
- Strategic approach to the assessment, safeguarding and enhancement of greater and lesser horseshoe bat habitat (particularly the Juvenile Sustenance Zone between the A370 and Chelvey Road), and Tickenham; Nailsea and Kenn Moor SSSI interests.
- Development should avoid the flood plain and demonstrate reduced run-off rates including through the use of attenuation ponds and other features as appropriate. Additional land may be required off-site to facilitate long term water storage as part of the sustainable drainage strategy.
- Development to be mitigated with the delivery of:

## APPENDIX A

- i. New multi-modal link from A370 Long Ashton Bypass to station interchange (including rail crossing), Nailsea SDL and Nailsea town centre, with connection to A370 west of Backwell (including rail crossing) and a new or improved connection to M5.**
- ii. New MetroBus route linking Bristol to Nailsea from Long Ashton Bypass to the station interchange (including rail crossing), Nailsea SDL and Nailsea town centre, and potential onward link to Clevedon.**
- iii. Opportunities to phase delivery of the highway improvements in step with parts of the development may be explored.**

DRAFT



**POLICY 7.5 - BANWELL GARDEN VILLAGE****NW of Banwell, North Somerset**

Land to the north west of Banwell is shown indicatively on the Key Diagram as the broad location to accommodate a new Garden Village. The key strategic principles and infrastructure requirements are as follows:

- Delivery of a new garden village to the north west of Banwell with its own character and sense of identity, whilst demonstrating sensitivity to the existing context for around 1900 dwellings including affordable housing.
- Creation of a new local centre to provide a focal point for the new community with an appropriate range of small-scale retail, services and facilities to complement existing facilities in Banwell.
- Potential for higher density at the local centre and other accessible locations.
- Creation of new footpath and cycleways connecting the garden village to Banwell, Weston-super-Mare and the nearby Weston Villages.
- Delivery of bus service improvements to Weston-super-Mare and Bristol including potential for MetroBus.
- Development will not commence until the construction of the Banwell Bypass is delivered as part of the M5 to A38 highway improvements with connection to a new M5 Junction 21a at a location to be confirmed, and onward connection to the Sandford/Churchill Bypass. Opportunities to phase delivery of the highway improvements in step with parts of the development may be explored particularly where delivery of infrastructure is directly within the land controlled by the developer. Development must not prejudice the delivery of future improvements to M5, including the construction of the new M5 junction.
- Local network and junction improvements including widening of Wolvershill Road.
- Provision of two primary schools one of at least 2.4ha and the other 3.4ha to be located to maximise safe accessibility from surrounding communities by walking and cycling. Provision for a new secondary school to serve the Banwell and Churchill SDL should be made with location to be confirmed through the local plan.

- **Strategic approach to the assessment, safeguarding and enhancement of greater and lesser horseshoe bat habitat including investigation of the potential to create a 'dark corridor' link through the development from open countryside around Stonebridge towards the Grumplepill Rhyne corridor.**
- **Development should avoid the flood plain and demonstrate reduced run-off rates including through the use of attenuation ponds and other features as appropriate. Additional land may be required off-site to facilitate long term water storage as part of a sustainable drainage strategy.**
- **Identification of around 5 ha of employment land primarily for B8 use class with good access to the M5 and new strategic transport infrastructure.**
- **As part of the approach to securing a multi-functional and interconnected green infrastructure, investigate the opportunity for an open setting along the northern edge of the existing village including potential for a nature reserve or other uses, with links out to open countryside to the east.**
- **Implementation of environmental improvements to the centre of Banwell following construction of the Bypass.**
- **Safeguarding of the setting of Banwell Conservation Area and protection and enhancement of the settings of listed heritage assets located both within and outside the historic core.**
- **Recognition that there are areas of high potential for archaeology which may require appropriate mitigation, particularly around Stonebridge and Wolverhill, and also between East Street and Riverside.**
- **Development form, and layout to respect the sensitivity of the location close to the Mendip Hills AONB.**

**POLICY 7.6 – CHURCHILL GARDEN VILLAGE****NW of Langford and Churchill, North Somerset**

The area of search for development to the north west of Churchill and Langford is shown indicatively on the Key Diagram as the broad location to accommodate a new Garden Village. The key strategic principles and infrastructure requirements are as follows:

- Delivery of a new garden village to the north west of Langford with its own character and sense of identity for around 2675 dwellings including affordable housing. An additional 125 dwellings are estimated beyond 2036.
- An interconnected and multi-functional network of green infrastructure will be established, including the provision of an appropriate strategic (open space) gap between Churchill Garden Village and existing settlements.
- Development should avoid the flood plain and demonstrate reduced run-off rates including through the use of attenuation ponds and other features as appropriate. Additional land may be required off-site to facilitate long-term water storage as part of a sustainable drainage strategy.
- Protection and enhancement of local heritage assets and their settings, including Churchill Court unregistered park and garden and listed buildings at Churchill Green and Front Street.
- Creation of a new local centre to provide the heart of the new community with a range of retail, employment, services and facilities.
- Potential for higher densities at the local centre and other accessible locations, and reduced densities on the fringes of the development to provide a soft edge and setting for the new community.
- Creation of new footpath and cycleways linking the new community with existing settlements and facilities including access to the Strawberry Line.
- Package of highway schemes including a new M5 junction, Banwell Bypass, Sandford/Churchill Bypass and capacity improvements to A38/A368 junction. Bus service improvements to Bristol and Weston-super-Mare, including the potential for Metrobus.

## APPENDIX A

- **Provision of three primary schools of at least 2.4ha each to be located to maximise safe access from surrounding communities by walking and cycling.**
- **Strategic approach to the assessment, safeguarding and enhancement of greater and lesser horseshoe bat habitat. Investigation and implementation of a green corridor through development linking from open countryside to the west to Windmill Hill to areas south of Langford and beyond to the Langford Brook.**
- **Identification of around 7.4 ha of employment land. Employment land to be located in close proximity to new highway link and will provide business opportunities in the B Use Class.**
- **Development form, and layout to respect the sensitivity of the location close to the Mendip Hills AONB.**
- **Windmill Hill to be retained as a focal green feature for ecological, recreational and landscape value. It also has archaeological significance as a location for the remains of Iron Age settlement.**

**POLICY 7.7 – NAILSEA****SW Nailsea, North Somerset**

Land to the south west of Nailsea is shown indicatively on the Key Diagram as the broad location to accommodate a new extension to the town. The key strategic principles and infrastructure requirements are as follows:

- Delivery of an extension to the south west of Nailsea with its own character and sense of identity for around 2575 dwellings including affordable housing. An additional 725 dwellings are estimated beyond 2036.
- Creation of a new local centre to form the heart of the new community with a range of retail, employment, services and facilities, but of a scale and type which is complementary to Nailsea town centre which will remain the main centre.
- Higher densities at the local centre and at accessible locations, particularly along the proposed MetroBus route and lower densities towards the western edge of the development.
- Creation of new footpath and cycleways linking the new local centre with residential areas, locations within Nailsea and the rail station and public transport services.
- Development to be mitigated with the delivery of:
  - i. New multi-modal link from A370 Long Ashton Bypass to station interchange (including rail crossing), new development area and Nailsea town centre, with connection to A370 west of Backwell (including rail crossing) and a new or improved connection to the M5.
  - ii. New MetroBus route linking Bristol to Nailsea from Long Ashton Bypass to the station interchange (including rail crossing), new development area and Nailsea town centre, and onward link to Clevedon via M5 J20 link.
  - iii. Opportunities to phase delivery of the highway improvements in step with parts of the development may be explored.
- Local junction improvements including Station Road, and A370 Backwell signalised junction.
- Provision of a secondary school of 8 ha and four primary schools of at least 2.4ha each, located to maximise safe access by walking and cycling.

- **Strategic approach to the assessment, safeguarding and enhancement of greater and lesser horseshoe bat habitat, and Tickenham; Nailsea and Kenn Moor SSSI interests. This includes investigating the potential for a dark corridor through the new development linking habitats at Backwell through to open countryside to the north and at Batch Farm Meadow wildlife site.**
- **Protection of heritage assets and their settings particularly listed farm buildings in the area whose settings should be addressed through a sensitive green infrastructure strategy.**
- **Long-term water storage and other measures are likely to be required as part of a sustainable drainage strategy, as well as reduced run-off rates to surrounding area. Measures to ensure water quality and levels are not adversely impacted on the nearby Tickenham Moors SSSI must be in place.**
- **The separate identity and character of Nailsea and Backwell will be retained through the provision of an appropriate Strategic Gap.**
- **Improvements to the rail station to create a multimodal interchange including enhanced parking, facilitating increased frequency and capacity, accessibility and accommodating a MetroBus interchange.**
- **Consideration of relocation/undergrounding of existing pylons.**
- **Identification of around 10.5 ha of employment land well-connected to the railway station, local centre and Metrobus route. Investigate the potential for a new office park close to the railway with optimum travel links.**

**POLICY 7.8 -BUCKOVER GARDEN VILLAGE****Buckover, South Gloucestershire**

**A Garden Village will be developed on land either side of the A38 at Buckover (east of Thornbury) as shown indicatively on the Key Diagram.**

**An appropriate delivery body, including the land value capture, ownership and management of assets, long-term stewardship and governance arrangements (for the benefit of the community), land uses, master planning and detailed design principles will accord with Garden City principles and shall be agreed with the Council following consultation with the local community, Parish and Town Councils and other relevant stakeholders.**

**These principles will be set out in a new Local Plan policy and other planning policy documentation and delivery agreements as appropriate.**

**The Garden Village should also comply with the following key strategic objectives and infrastructure requirements:**

- **Provision of around 3,000 dwellings (including affordable homes), to be delivered by a full range of providers and of a wide range of types and tenures, complementing existing predominant house types in the local area. At least 1,500 will be delivered within the plan period. The homes will be innovative, of high quality design, spacious and well-planned, meeting Nationally Described Space Standards as a minimum.**
- **A new Local Plan policy will establish an appropriate policy designation to ensure a permanent strategic gap between the new Garden Village and Thornbury.**
- **A Green Infrastructure network will also be established to ensure a permanent and robust landscape edge to the western boundary of Buckover Garden Village, Ridgewood and the setting of local heritage and ecological assets are protected and local food production is given emphasis within the new settlement.**
- **Provision of and support for a range of retail, community & cultural facilities in the Garden Village and potentially other nearby communities to complement existing local provision.**
- **Provision of a primary school and 3-16 all through school and nursery(s).**
- **Provision of around 11 ha of employment land to provide a range of local employment opportunities, including provision for start-up, SMEs and larger businesses.**
- **Embedding of zero-carbon and energy positive solutions throughout the planning, design and delivery process across the whole settlement.**

## APPENDIX A

- **Provision of a strategic transport package including as appropriate delivery of or contributions towards: Metrobus Extension to Thornbury & Buckover GV, A38(N) Park & Ride, M5 J14 improvements, Charfield rail station re-opening, local bus service improvements (including new local shuttlebus to Thornbury), strategic and local cycle and pedestrian connections to Thornbury and other local highway network improvements as necessary.**
- **Consideration will also be required to ensure the A38 can continue to act as an effective relief road to the M5 without detriment to the new resident's health & wellbeing.**

DRAFT



**POLICY 7.9 - CHARFIELD****Charfield, South Gloucestershire**

Land at Charfield will comprise a number of major interdependent development areas around the village. Development of these separate land parcels should be undertaken in a co-ordinated manner to ensure Charfield becomes a more sustainable settlement.

New development should also comply with and or contribute towards the following strategic principles and infrastructure requirements:

- Provide around 1200 dwellings, including affordable housing, to be developed within the plan period. New housing should expand the range of types and tenures available in the village.
- The future role and function of existing retail and community assets and remaining greenfield land parcels within the centre of the village adjoining the Wotton Road will firstly be reviewed in consultation with the local community to ensure future needs are assessed, new and existing facilities make the most efficient use of land and they assist to maximise the sustainability of the expanded village.
- Replacement of the existing primary school with a new 3FE school in a central village location and contributions to delivery of an expanded secondary school in the locality, and or the delivery of a new all through 3-16 school at Buckover Garden Village.
- New and/or improved retail and community facilities.
- A minimum of 5 ha of new employment land (traditional B-use classes) distributed within the development areas at appropriate locations.
- The new development will provide or contribute to a strategic transport package including: M5 J14 improvements, Charfield rail station re-opening, local bus services, a comprehensive Wotton Road environmental enhancement scheme, new and improved foot and cycle connections through the village and to key local destinations such as Renishaws, KLB school and Wotton-under-Edge, and including a new Charfield circular public right of way route.
- A Green Infrastructure network will enhance and protect the Little Avon River and its flood zone, the setting to Elbury Hill and St James' Church, local SSSI, SNCIs and other Listed Buildings, as well as soften views from the AoNB.
- Reinforcement of the sewerage network and treatment works.

**POLICY 7.10 - COALPIT HEATH****Coalpit Heath, South Gloucestershire**

Land to the east of Coalpit Heath will deliver a new neighbourhood that responds positively to the locality's rich mining heritage and visually prominent aspect. The new neighbourhood should also comply with the following key strategic principles and infrastructure requirements:

- Provide around 1800 dwellings, including affordable housing, to be developed within the plan period.
- Provide a new local centre incorporating a new primary school, local retail outlet, & community facility/hub, and a second primary school (subject to further testing) plus contributions to a new or expanded secondary school in the wider locality.
- Incorporate up to 5ha of employment land (B-use classes)
- Provide or contribute to a strategic transport package including: Metrobus extension to Yate and Chipping Sodbury, A432 Park and Ride, Yate Rail Station enhancement, the Winterbourne and Frampton Cotterell Bypass, strategic cycle route and local bus services. Vehicular access will be off Badminton Road/Frog Lane, Roundways and Woodside Road.
- Establish a Green Infrastructure network that will reinforce a new Green Belt boundary along the rail cutting, provide attractive routes through the site to the nearby countryside (including along the historic Dramway), break up development impact along the ridgeline and protect the setting of nearby Listed Buildings.

**POLICY 7.11 – THORNBURY**

**Thornbury, South Gloucestershire**

**Land at Thornbury around the town's north and eastern edge off Butt Lane & Morton Way should comply with the following key strategic principles and infrastructure requirements:**

- **A maximum of 500 dwellings, including affordable housing, to be developed within the plan period.**
- **The new Local Plan will establish an appropriate policy designation to ensure a permanent strategic gap between Buckover Garden Village and Thornbury.**
- **Around 5ha of additional employment land on land at Crossways east of Morton Way, sensitively designed to respect the rural nature of the locality.**
- **Incorporate a new convenience store/retail or community opportunity and new and enhanced public open space.**
- **Establish a Green Infrastructure network that will protect Crossways & Cleve Wood, the setting of Hacket Farm, rural nature of Hacket Lane, Clay Lane & Crossways Lane, include SUDs features at Crossways to manage potential flooding at Crossways, and extend the Picked Brook Rhine streamside walk.**
- **Development will also make financial contributions towards local and strategic transportation schemes, including potentially: Metrobus Extension to Thornbury (& Buckover GV), A38(N) Park & Ride, M5 J14 improvements, Charfield rail station re-opening, local bus service improvements, local highway, foot and cycle improvements.**

## POLICY 7.12 – YATE

Yate, South Gloucestershire

Land at Yate comprising two broad locations to the northwest and west of Yate will deliver a new residential neighbourhood and employment area which should comply with the following key strategic principles and infrastructure requirements:

- A minimum of 2,000 dwellings, including affordable housing, of which at least 1,000 will be delivered within the plan period.
- Provide a new high quality, high density, mixed-use residential neighbourhood at NW Yate that improves connections through a regenerated Beeches Industrial Estate and to the rail station.
- The residential neighbourhood will contain a new local centre including a primary school(s) and/or all through 3-16 school, local retail and community facility/hub.
- A significant new employment land allocation totalling approx. 30ha will also be allocated at West Yate, of which, approximately:
  - 11ha of land south of Badminton Road will be allocated for B1 and B2 office/light industrial and research use; and
  - 19ha of land between the railway tracks off the Westerleigh Road will be allocated for B2/B8 and similar uses.
- The new development areas will provide or contribute to a strategic transport package including: Metrobus extension to Yate and Chipping Sodbury, strategic cycle route, A432 Park and Ride, Yate Rail Station enhancement, Winterbourne and Frampton Cotterell Bypass and local bus services. An on-site rail crossing and a new rail bridge is also likely to be required across the Nibley Lane.
- A Green Infrastructure network will reinforce a new Green Belt boundary, protect the river valley, linear settlement of Engine Common and Nibley Village, provide an attractive segregated route along the Frome Valley Walkway, and enhance North Road and the Frome river corridor through the Beeches Estate.
- The historic parliamentary enclosures, which comprise small to medium sized fields, reinforced by a strong mature hedgerow network and large number of trees, north of Mission Road and east and west of North Road will also be protected by a new landscape and or Green Belt designation which will be confirmed through the new local plan.
- Plus, early consideration of appropriate powers devolved to the West of England to enhance the prospect of land assembly, infrastructure

**delivery and the regeneration of existing industrial areas so also assisting bring forward a well planned and connected new residential development.**

DRAFT

## CHAPTER 5 DELIVERY AND IMPLEMENTATION

1. The authorities recognise that the policies in this Plan are applied consistently across the plan area and used to inform local plan reviews. Whilst most of the actions required are the responsibility of or within the control of the authorities it is acknowledged that some rely on action from statutory agencies and delivery partners. These include: the Homes and Communities Agency, Highways England, Network Rail, Environment Agency, the Local Nature Partnership, infrastructure providers and the development industry. The West of England authorities through the Duty to Cooperate will continue to work with these organisations.
2. The West of England has a Strategic Solutions Panel comprising the key delivery agencies and has worked closely with neighbouring authorities in the production of the JSP. The JSP is supported by an evidence base on infrastructure delivery as set out in Topic Paper x.
3. The governance structure, within which joint working in the West of England operates, facilitates meeting the duty to co-operate. The four local authorities have a history of close joint working. Previously this was under the Planning Homes and Communities Board. There is now a formally constituted Joint Committee (Leaders/Mayor) and an Infrastructure Advisory Board (constituted of Cabinet Members and a business representative), to take a coordinated approach to Transport and Planning. These meetings are held in public as required to ensure transparency and accountability. The nature of the ongoing work to meet the duty to cooperate is set out in the duty to cooperate schedule which is reported to the Infrastructure Advisory Board.

### Funding

4. The scale of the challenge means that delivering the JSP will require a multi-agency approach. The West of England Authorities recognise that our potential can only be achieved through collaborative working, and finding new ways and models of delivery such as compulsory purchase powers, in which we can secure the investment required to stimulate growth.
5. The JSP sets out our delivery priorities and seeks to influence decision making on investment (securing funding and directing that funding obtained) by internal and external decision makers.
6. In the West of England working closely with the Local Enterprise Partnership the four authorities operate a joined up approach to funding. This is a single pot which includes the revolving infrastructure fund, city deal funding and growth deal funding. In 2016, the three Authorities of Bath and North East Somerset, Bristol and South Gloucestershire agreed a devolution deal with Government and the West of England Combined Authority was established in 2017. As part of

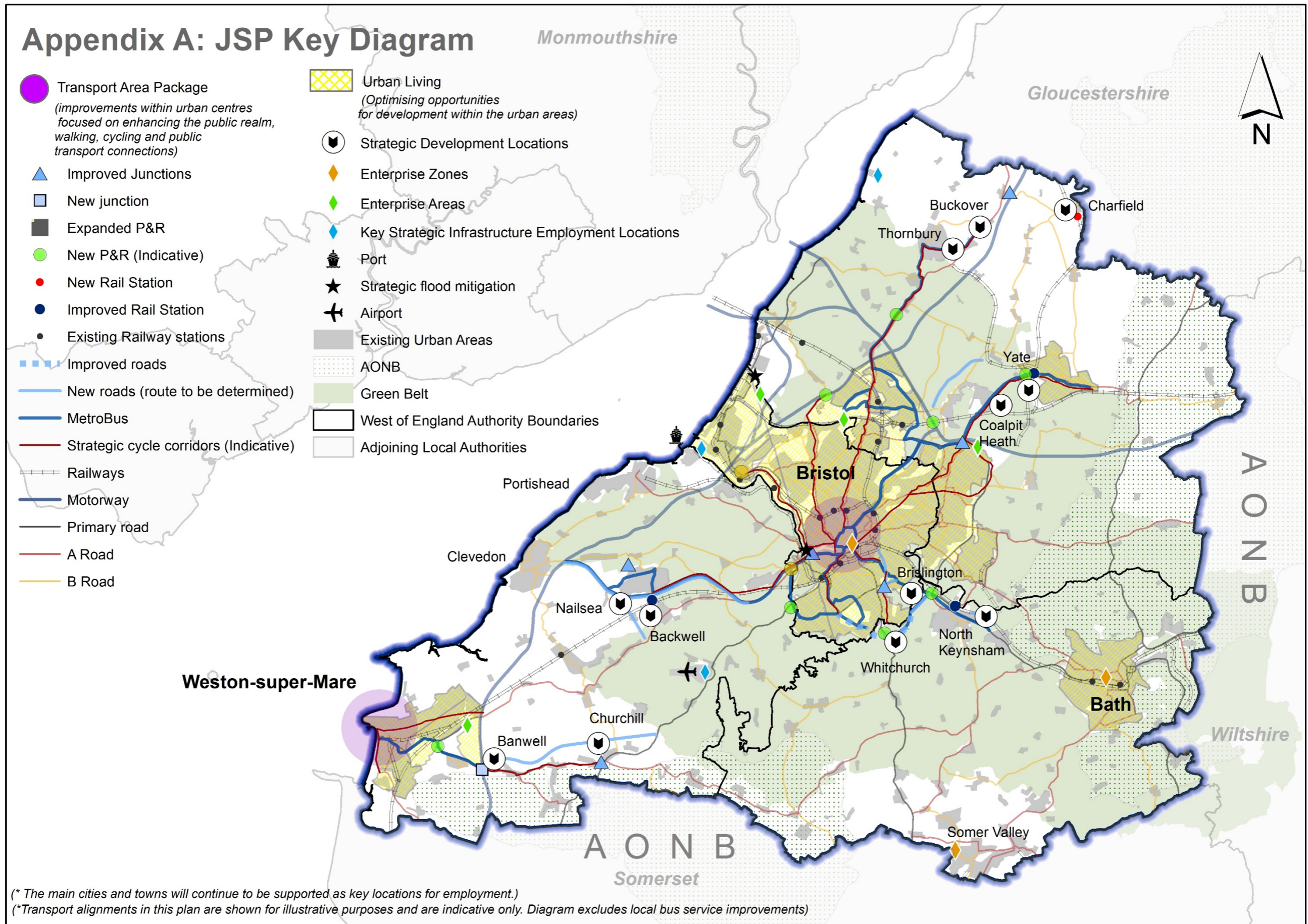
## APPENDIX A

devolution, Government devolved funds of some £900m investment (£30m per annum over 30 years) to the Combined Authority to assist in supporting priority infrastructure schemes. This includes schemes coming forward to support the JSP development locations.

7. Infrastructure delivery will be enabled through the most appropriate blend of funding and a range of funding mechanisms from the West of England and our partners. The principle of funding development is an equitable share of costs between the public and private sector.
8. Different sources of funding will be proactively sought and brought together. This enables a co-ordinated, targeted approach to investment, often with investment in infrastructure up front, to assist in 'unlocking' locations/sites in a timely and co-ordinated manner to achieve the most development potential. Where appropriate and necessary we will actively look to use Compulsory Purchase Powers (CPO) to undertake land assembly and to resolve barriers to the delivery of new homes, jobs and supporting infrastructure.
9. Positive planning in this way will support opportunities to accelerate sustainable growth. The JSP aims to direct investment to our shared strategic development locations, to seek alignment with other agencies capital investment programmes and to collaborate with the development industry, to assist in implementing the Plan.

### Monitoring

10. The preparation of the JSP has been informed by a supporting evidence base. The JSP will steer local plan reviews. Once adopted local plans will continue to be informed, monitored and reviewed so that they may respond to changing needs and circumstances.
11. Information on monitoring of the JSP is expected to be reported through joint or individual Council's Authority's Monitoring Reports.
12. Each authority will: -
  - undertake a consistent and jointly agreed process of monitoring which will identify changes in stock, the contributions of different sources of supply, changes in housing requirements, and the provision of necessary infrastructure and services; and
  - in considering the release of sites for housing through local plans, take account of progress in implementing the Plan's proposals across the Joint Spatial Plan area as a whole, including its neighbouring authorities.

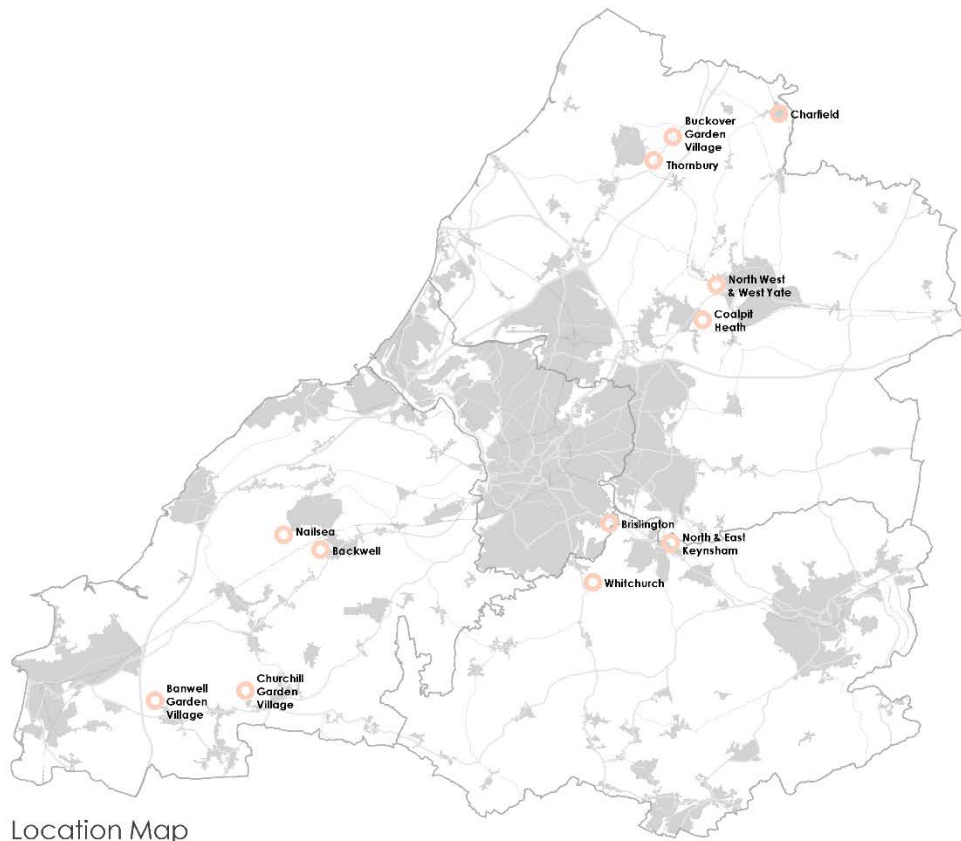




West of England Joint Spatial Plan: Publication Draft

Strategic Development Location Templates

Date of issue: Papers for West of England Joint Committee - 30 October 2017



Location Map

© Crown Copyright and database rights 2017. Ordnance Survey 100023406.

## Strategic Development Location Templates

### Introduction

This report documents the work carried out as part of the Joint Spatial Plan (JSP) to further refine the assessment of potential for development at the Strategic Development Locations (SDLs) identified in the previous draft of the JSP – *Towards an Emerging Spatial Strategy (TESS)* published in November 2016. The purpose of this phase of the work has been to more clearly establish the capacity and strategic development requirements at each strategic development location which has been used to inform JSP Policy 7.

The contents of this technical report are therefore intended to illustrate the possible extent of where development might take place (and where it might not). The diagrams presented are illustrative at this stage as further work is being undertaken by each UA through their respective Local Plans’.

**Accessing prospects for delivery** The previous iteration of the Joint Spatial Plan – *Towards an Emerging Spatial Strategy (TESS)* (Nov. 2016) included a range of potential Strategic Development Locations across the West of England and assigned a broad dwelling capacity to each. This work was supported by evidence published in the ‘*Assessment of Strategic Development Locations – Beyond Settlement Boundaries – Locational Dashboards*’. The templates presented in this document are a continuation of this earlier work.

For each of the proposed SDLs (listed in the table below), a template is provided which focusses on the delivery challenges and opportunities faced at each SDL and the approximate scale of development potential achievable.

SDL	Local Authority	Page
North Keynsham	Bath & North East Somerset	3-10
Whitchurch	Bath & North East Somerset	11-16
Brislington	Bristol City Council	17-22
Backwell	North Somerset	23-30
Nailsea	North Somerset	31-40
Churchill Garden Village	North Somerset	41-50
Banwell Garden Village	North Somerset	51-59
Buckover Garden Village	South Gloucestershire	60-65
Charfield	South Gloucestershire	66-71
Coalpit Heath	South Gloucestershire	72-77
North West & West Yate	South Gloucestershire	78-84
Thornbury	South Gloucestershire	85-90

For each SDL the following information is provided:

- **Location characteristics:** *Site location, approximate size, relevant planning history and designations, current land use.*
- **Suitability (constraints and opportunities):** *Strategic opportunity, site characteristics, physical & environmental constraints, existing development schemes, opportunities.*
- **Landuses, capacity, availability & viability:** *Mix of uses, employment, housing typology / density, housing capacity, availability, viability.*
- **Draft policy expectations for the location:** *Vision, housing capacity (types, typology & affordable housing) and other land-uses, access, Green infrastructure, infrastructure requirements.* Draft policy expectations identified in this section are further articulated through relevant policies in the JSP (particularly policies 4 and 7).
- **Barriers to delivery / critical interventions:** *Identified risks to suitability availability & achievability, actions needed to reduce risks.*
- **An indicative housing trajectory:** *Outlining indicative lead in times, start dates, build-out rates, and the number of developers (outlets) anticipated.*

- **A concept diagram:** Which provides the broad location or area of search for growth in each SLD. It is important to note that the options for development of the SDLs, including the areas identified in the diagrams, are indicative and of the more precise allocations to be made in Local Plans will depend on further work to be undertaken.

Due to the scale of these strategic developments and the inherent long term nature of their planning and development, at this stage only key infrastructure requirements are identified as the exact requirements for each development and how these might correspond to a land use requirement are not yet known. Further evidence gathering and testing will be required to support their implementation and will be informed by further detailed land allocation, master planning and policy formulation, undertaken through local authorities' respective Local Plan processes.

Further technical information relating to the templates is provided within the supporting methodology paper.

Strategic Development Location – North Keynsham  
Bath and North East Somerset

Date of Issue: October 2017



Location Map

© Crown Copyright and database rights 2017. Ordnance Survey 100023406.

## 1.0 Location characteristics

### 1.1 Site Location

The area lies to the north-east of Keynsham, between the town and the River Avon. The majority of the area lies between the river and the Great Western Main Line with a smaller section between the railway and the A4. It also includes the land south of the A4 which is safeguarded for development through B&NES Core Strategy.

### 1.2 Size

Approx: 150ha(Gross) and 70ha developable area.  
Safeguarded land: 12 ha

### 1.3 Relevant planning status and designations

The area sits within the Green Belt.

North of the Wessex Water site is a former landfill site which has been allocated in the West of England Joint Waste Core Strategy for a residual waste facility.

Land around World's End Lane is allocated in the B&NES Local Plan as a Strategic Site for employment (30,000sqm of B1 and B2).

Land south of the A4 has been allocated for residential development and granted outline planning consent for 250 dwellings. Further land adjacent the allocated sites has been safeguarded for additional development of approximately 250 dwellings.

### 1.4 Current land use

Mixed including agricultural, industrial, utility, leisure, private riverside park with some residential moorings.

## 2.0 Suitability (Constraints & Opportunities)

### 2.1 Strategic Opportunity

The Emerging Strategy consultation identified North Keynsham as accommodating up to a further 1100 dwellings in the plan period (to 2036). However, further work indicates around 1,250 dwellings can be accommodated. Together with the safeguarded land capacity of 250 dwellings, a total of 1,500 dwellings can be accommodated in this location.

### 2.2 Site characteristics.

The area is largely characterised by open, flat arable and pasture fields of varied sizes around a mix of industrial, agricultural and residential buildings accessed by narrow lanes. Field boundaries and lanes are marked by strong hedge and treelines with stronger boundaries along the riverside and railway. Broadmead Brook runs south-north close to Broadmead Lane before heading east and discharging into the river

### 2.3 Physical & Environmental constraints.

Access: Access to the area is significantly constrained by the railway, the River Avon and by associated capacity constraints on the A4 and connecting roads. Existing lanes through the site are narrow and have constrained crossings at the railway. At present there are three vehicle access points: at the far western end via Keynsham Road or Avon Mill Lane, providing access to the town centre and railway station; in west via the Broadmead Lane underbridge; and in the east via the Pixash Lane overbridge (Heritage Listed, constraining opportunity to improve capacity). There are additional minor links at Unity Road (connecting the DS Smith site, under the A4, towards Bath Road) and east of World's End Lane.

A series of Public Rights of Way run through the eastern end of the site and provide access towards the long distance routes provided by the River Avon Trail, Monarch's Way and the Bristol and Bath Railway Path (NCN4), which provides opportunity to connect towards Bath. There is currently no direct pedestrian/ cycle route from the area across the river.

At present there is no public transport connectivity to the area with the nearest services running along the A4 and Keynsham Road. While the site is close to Keynsham Station, pedestrian and cycle access is poor and indirect.

**Ecology:** Stidham Farm Site of Special Scientific Interest (SSSI) is located to the east of the area and currently managed as an arable field. There are three Sites of Nature Conservation Interest on site: Stidham Farm SNCI, Broad Mead Field SNCI in the centre (designated for its marshy grassland and botanical interest), and the River Chew SNCI (designated for its running water and associated marginal habitats, including protected fauna, which use the site in part as a wildlife corridor). The River Avon SNCI runs adjacent to the northern site boundary and is designated for its running water and associated marginal habitats, including protected fauna, botanical and invertebrate interest.

**Landscape:** The area contains a number of character areas with woodland at the western end, around the DS Smith site and open fields in the centre and east. The main (northern) area of the area has a relatively open and tranquil character due to its physical and visual separation from the built settlement of Keynsham and the mid to long distance views of the Cotswolds. At the eastern end, the railway lies in a cutting and provides less visual severance. South of the railway, the land is urban fringe in nature, merging into open countryside. Landscape is sensitive and has limited capacity to accommodate new development, particularly at the eastern end. Buffer planting and/or setbacks will be required along these edges.

**Green Belt:** The area is located within the Bristol-Bath gap, an area in which Green Belt land generally contributes to some extent to the prevention of merger between Bristol, Keynsham and Bath.

**Archaeology and Heritage:** The site includes a small number of listed buildings around Avon Mill Lane, two Listed bridges (Pixash Lane and pedestrian bridge to the east) and a number of heritage sites with HER records, notably some Roman finds at Avon Valley Park. There are a small number of buildings with notable character at Broadmead Lane Industrial Estate and Avon Valley Farm.

**Flood Risk:** Primarily within Flood Zone 1. However the northern area of the peninsula including Broadmead Lane Industrial Estate, a corridor along the River Avon and the access from Avon Mill Lane / Keynsham Road are located Flood Zone 2 and 3 and may be affected by climate change.

**Utilities:** The site is highly constrained by the presence of the Wessex Water sewage treatment works at Broadmead Lane. Anecdotal evidence suggests that the site has odour nuisance issues which could limit it's attractiveness for more sensitive development such as residential. Wessex Water odour risk assessment would be triggered within a 400m consultation zone around the works site.

The site is crossed by a number of utilities, most notable is the gas pipeline (Feeder 14) which passes south-west to north-east at the eastern end of the type. The pipeline was not constructed to allow new roads above so would require upgrading or diverting if it were crossed. A National Grid easement of 10m exists either side with further HSE consultation zones around the alignment (inner zone: 40m, middle zone: 125m, outer zone: 155m).

A sludge pumping main crosses east-west through the centre of the site towards the Wessex Water site with a second route running north from the works. The western end of the site is crossed by a number of high- and low-voltage Western Power lines. Many of these routes would require easement or diversion to facilitate development.

Proximity to active industrial sites: potential environmental health concerns, strong impact on views from and to the site and likely poor frontage along proposed North Keynsham Link Road route.

**Ground Conditions:** The site gently slopes down towards the River Avon with a more prominent slope at the eastern end close to the railway path.

The site includes some areas of artificial ground and historic landfill. This and the existing industrial uses could pose contamination issues for development.

The ground conditions are generally not expected to pose constraints for foundations however further investigation would be required.

## 2.4 Existing development schemes

Land south of the A4 has been allocated for residential development and granted outline planning consent for 250 dwellings.

## 2.5 Opportunities

- Upgrade the riverside area and link into the marina proposals, to provide an enhanced public experience alongside ecological improvements.
- Frontage and outlook onto the River Avon, providing a high-quality living and recreation environment. Strong opportunity around a new marina for high-density residential development.
- Provide a strong neighbourhood centre to act as a focus to the site, serving residents and employees. Opportunity to cluster retail, service and education uses around key open space and marina frontage.
- Opportunity to create strategic pedestrian and cycle connections to Keynsham town centre and railway station and the local schools. Connections across the river towards the long distance walks should be explored.
- Consider realignment of the proposed North Keynsham Link Road. Appropriate street environment to be used to provide traffic calming.
- Create green corridors between the riverside area and the railway corridor, providing a range of ecological, connection and recreation opportunities and accommodating surface water attenuation.
- Opportunity to provide a new, enhanced facilities at the Avon Valley Park to cater for an increased number of visitors with a wider range of attractions.
- Development provides the opportunity to improve the functionality of the floodplain and ease flows in connecting watercourses.

## 3.0 Landuses, capacity, availability & viability

### 3.1 Mix of uses

Housing, marina with residential moorings, employment (industrial), waste facilities, local centre with shops, primary care and community facilities, leisure facilities and open space.

### 3.2 Employment (type/ha)

Employment development around main access road: 14ha (55,000sqm floorspace)

### **3.3 Housing typology / density.**

The development should support a high-quality mix of housing typologies and tenures to develop a sustainable community which compliments the existing settlement.

High-density apartments to give a strong frontage around the marina, mix of mid-density houses and apartments over the centre of the site and lower density family housing at the eastern edges where the visual impact will be greatest.

An assumption has been made that higher density units would be provided over 3-4 storeys giving strong frontages and higher densities around public open spaces and the main road. Development over the rest of the site is more appropriate at 2-3 storeys.

Around the edges, development should respond to the potential for attractive views towards the riverside and provide appropriate surveillance of public areas whilst minimising visual impact.

The site has potential as a location for custom-build or self-build housing with plots set aside for these alternative delivery mechanisms. This could help establish a strong and unique identity for the site.

### **3.4 Capacity**

About 1500 units comprised 30 - 35% AH (34ha + 12ha), a full range of types and sizes.

### **3.5 Availability**

Call for Sites: 2 representations Pegasus (Edward Ware) and JLL(Avon Valley Adventure & Wildlife Park, John Douglas Estates, The Bendall Family and 3C Commercial).

Multiple ownership

### **3.6 Viability**

Viability likely to be dependent upon alternative sources of funding. See viability evidence for further information.

## **4.0 Concept Diagram**

Refer to Appedix 1 Concept Diagram

## **5.0 Draft policy expectations for location**

### **5.1 Vision**

To create a new sustainable urban neighbourhood with increased access to the River Avon and connecting Keynsham to strategic walking and cycle routes.

This will be a lively, safe, sustainable and healthy place which reinforces the distinctive character of Keynsham, improves connectivity, enhances our understanding and respect of nature and creates spaces around which a new community can start to form.

The community will thrive and develop within a well-integrated and multifunctional green infrastructure network of new wetland features, restored floodplain meadows and new woodland.

New transport infrastructure will be put in place in a timely way to ensure that it is properly integrated and connected with its surrounding communities, and designed so that sustainable and active travel becomes the preferred option for most. The existing network of walking and cycle routes will be extended, public transport will be



significantly improved, and a new multi modal link road connecting Avon Mill Lane to the A4 will be constructed at an early stage in the development.

## **5.2 Housing capacity (types, typology & affordable housing) and other land uses.**

About 1550 units comprised 30 - 35% AH (34ha + 12ha), a full range of types and sizes including marina providing residential and leisure moorings

Employment development around main access road: 14ha (55,000sqm floorspace)

New waste and recycling site (4ha)

New local centre (0.5ha) potentially including shops, primary care, community/ recreational facilities

Primary School (1.2ha)

## **5.3 Appearance**

New marina providing residential and leisure moorings. High density housing fronting marina and riverside, maximising development along valuable views and provide strong surveillance.

## **5.4 Access**

North Keynsham Link Road alignment through centre of site from Avon Mill Lane to A4 with new roundabout.

Pedestrian and cycle connections across the River Avon. Improved pedestrian and cycle connections to Keynsham railway station.

Existing vehicle routes downgraded to pedestrian and cycle only links.

## **5.5 Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)**

Green spines through residential areas providing surface water attenuation through SUDS. Public access to riverside area with ecological landscape and public realm improvements and increased leisure amenity. Links to the East Keynsham Strategic Allocation and community woodland. Extensive buffer planting around edges of site to mitigate the visual impact of development.

## **5.6 Infrastructure requirements (health, education, utilities) etc**

A new primary school, new primary care facility, recreation facilities potentially including sports pitches, open space, new marina, neighbourhood centre

## **6.0 Barriers to delivery / critical interventions (Achievability Risks)**

### **6.1 Identified risks to suitability, availability and achievability.**

The critical risks are:

- Delivery of strategic transportation improvements including the North Keynsham Link Road and the link road between A4 and A37.
- Poor access to the site using existing routes and congestion on connections to the A4. Improvements would require new bridge access and new road provision at a cost to the project.
- Un-coordinated piecemeal development that fails to secure necessary improvements to the range of services, facilities and accessibility improvements.
- Proximity to active industrial sites; potential environmental health concerns.
- Existing infrastructure considerably constrains the layout of the site unless relocated which will have an associated cost to the project.

### **6.2 Actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)**

- Consideration / review of developer contributions strategy.
- Keynsham wide access and movement strategy required.

- Early engagement with local school academy / options assessment required.
- Land ownership and legal check (see trajectory below).

## 7.0 Indicative trajectory

7.1 Trajectory assumed lead in time of 11 yrs, to allow for strategic transportation measures to be funded and programmed. Indicative build out rates: 50-200pa. Slow build out to allow new community to form.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
<b>N Keynsham</b>	0	0	0	0	0	0	0	0	0	0	0
	<b>2027/28</b>	<b>2028/29</b>	<b>2029/30</b>	<b>2030/31</b>	<b>2031/32</b>	<b>2032/33</b>	<b>2033/34</b>	<b>2034/35</b>	<b>2035/36</b>	<b>Capacity within Plan period</b>	
	50	100	150	200	200	200	150	200	150	1,400	

<b>Post 2036</b>	<b>Total Capacity</b>
100	1,500



# Strategic Development Location – Whitchurch Bath and North East Somerset

Date of Issue: October 2017



Location Map

© Crown Copyright and database rights 2017. Ordnance Survey 100023406.

## 1.0 Location characteristics

### 1.1 Site Location (address)

Land South East of Bristol, Whitchurch

### 1.2 Size

Approx. 120ha (Gross), 68 Ha Developable Area (approx.)

### 1.3 Relevant planning status and designations

- The area is within the Green Belt.
- The area is part of the setting of Maes Knoll and the setting of the Queen Charlton Conservation Area
- Land east of Whitchurch is allocated for 200 dwellings in the B&NES Local Plan as a Strategic Site. Of which 100 dwellings has been granted. (16/02055/FUL)

### 1.4 Current land use

Primarily agricultural land.

## 2.0 Suitability (Constraints & Opportunities)

### 2.1 Strategic Opportunity

Assessments indicate capacity for around 2,500 dwellings in total, with 1,600 dwellings developed within the plan period.

### 2.2 Site characteristics.

This area lies to the south east of the village of Whitchurch. The land is mainly untended grassland with pasture and grazing land and areas of recreational land. To the south and east lie areas of open countryside with small clusters of dwellings along the lanes. Maes Knoll, an ancient hilltop fort, forms a significant landmark to the south west and its setting is very important.

### 2.3 Physical & Environmental constraints.

**Access:** The A37 provides a direct link to Bristol city centre. There are a number of narrow lanes with radiate out through the surrounding countryside. In terms of wider connections, Whitchurch Lane gives a link to the A4174 which provides access to the western parts of the city centre, on to the A4 and M5. Keynsham is accessed via Woolard Lane and Charlton Road.

**Ecology:** Adjacent to Sturminster Road and Stockwood Open SNCI.

**Landscape:** The site relates to parts of two landscape character areas: Stockwood Vale to the north east, and Dundry Plateau broadly to the west. Stockwood Vale is a particularly sensitive landscape character area, as is the setting of Maes Knoll. The landscape buffer between the southern Bristol suburbs and the village of Whitchurch ensures the physical and visual separation of the village from the Bristol urban area.

**Heritage:** Listed Buildings (including Lyons Court Farmhouse and St Nicholas Church). The site forms part of the setting of Queen Charlton Conservation Area and Maes Knoll Scheduled Ancient Monument and Wansdyke Scheduled Ancient Monument.

**Flood Risk:** The area around the village lies almost entirely within FZ1. A small area of fluvial FZ2 flows a tributary of Brislington Brook that flows between Whitchurch Park

and Stockwood. There are already significant existing surface water flooding issues in the adjoining urban areas of Dundry and Whitchurch. Any development upstream of these areas should ideally take the opportunity to reduce flood risk and as a minimum must not increase flood risk or create any new flood risk areas.

**Utilities:** The site contains a strategic gas pipe that needs to be taken into account when masterplanning the development site. New water mains and other infrastructure requirements will be met as part of the site development costs.

**Ground Conditions:** The ground conditions are generally not expected to pose constraints for foundations however further investigation would be required.

## 2.4 Existing development schemes

No existing development schemes apart from the land east of Whitchurch allocated for 200 dwellings in the B&NES Local Plan as a Strategic Site.

## 2.5 Opportunities

To encourage active travel and to reduce car dependency, there are important opportunities to enhance existing and to provide new sustainable transport routes, particularly into central Bristol and to Keynsham.

Green infrastructure opportunities should seek to optimise the setting of both Maes Knoll and Queen Charlton Conservation Area, enhance the potential of Stockwood Vale as an important green infrastructure asset for the wider community, and seek to safeguard the open green fields that separate Whitchurch village from Bristol.

## 3.0 Landuses, capacity, availability & viability

### 3.1 Mix of uses – housing led mixed use development

New community Including residential (2,500 dwellings), employment, new local centre, two new primary schools, a secondary school, Park and Ride and new green infrastructure

### 3.2 Employment (type/ha)

To be determined though the local plan process.

### 3.3 Housing typology / density.

Urban extension. Range of densities to create variety and character responding to the local environment. Significant green infrastructure, and designed to encourage active travel. (68 ha, 2,500 dwellings max, at average 40dph)

### 3.4 Capacity

Predominately at 40 dph, with some lower density development in more sensitive locations, the area (would provide approximately 2,500 dwellings).

### 3.5 Availability

Multiple ownership, with some larger landowners and developer partnerships emerging.

### 3.6 Viability

Viability likely to be dependent upon alternative sources of funding. See viability evidence for further information.

## 4.0 Concept Diagram

Refer to Appendix 1 – Concept Diagram

## 5.0 Draft policy expectations for location

### 5.1 Vision

The new development to the south east of Bristol will be an exemplary and inspirational place; a high quality, people centred environment that feels safe, sociable and attractive for all. The design of the new development will respond positively to its sensitive and important environmental, landscape and historic context, and will be at least zero carbon.

It will be a residential led community, and will include local centres, two new primary schools and a secondary school, new health and community facilities, a variety of employment workspaces, all integrated with new parks, open space and green infrastructure.

New transport infrastructure will be put in place in a timely way to ensure that it is properly integrated and connected with its surrounding communities, and designed so that sustainable and active travel becomes the preferred option for most trips. The existing network of walking and cycle routes will be extended, public transport will be significantly improved.

### 5.2 Housing capacity (types, typology & affordable housing) and other land uses. 2,500 dwellings Affordable Housing 35%

### 5.3 Appearance

The development of a contemporary, inspirational and recognisable place, that helps to create positive relationships with the built and natural environments and with neighbouring communities.

### 5.4 Access

Contribution to strategic transport package including: the link between the A4 and A37, from the A37 to South Bristol Link Road, and the construction of a new Park and Ride. Developer investment is required in highway, foot and cycle connections.

Enhancements are required to be made to existing cycle routes into Bristol and to the south, and the implementation of new cycles routes to improve connectivity with Keynsham, particularly the town centre and railway station.

Strong encouragement to walking, cycling and public transport use.

### 5.5 Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)

Contributing to and reinforcing a comprehensive green infrastructure network and implementing opportunities for enhancing biodiversity.

### 5.6 Infrastructure requirements (health, education, utilities) etc

The new development will provide 2 new primary schools, a secondary school, Park and Ride, health and community facilities.

## 5.7 Energy/heat

New development will aim to maximise the range of sustainability measures, e.g. including micro renewables, passivhaus standard homes, homeworking measures and electric car charging facilities etc. District heating networks will also be investigated.

## 6.0 Barriers to delivery / critical interventions (Achievability Risks)

### 6.1 Identified risks to suitability, availability and achievability.

The critical risks are:

- Critical risk is the delivery of strategic transportation link between the A4 and A37. The location has the potential to be well linked to Bristol city centre by bus, and to Keynsham town centre by cycling.
- Un-coordinated piecemeal development that fails to secure necessary improvements to the range of services, facilities and accessibility improvements.

### 6.2 Actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)

- Early prioritisation, identification of funding and infrastructure delivery is required.
- Early engagement around viability modelling.
- Early consideration of utility strategy.

## 7.0 Indicative trajectory

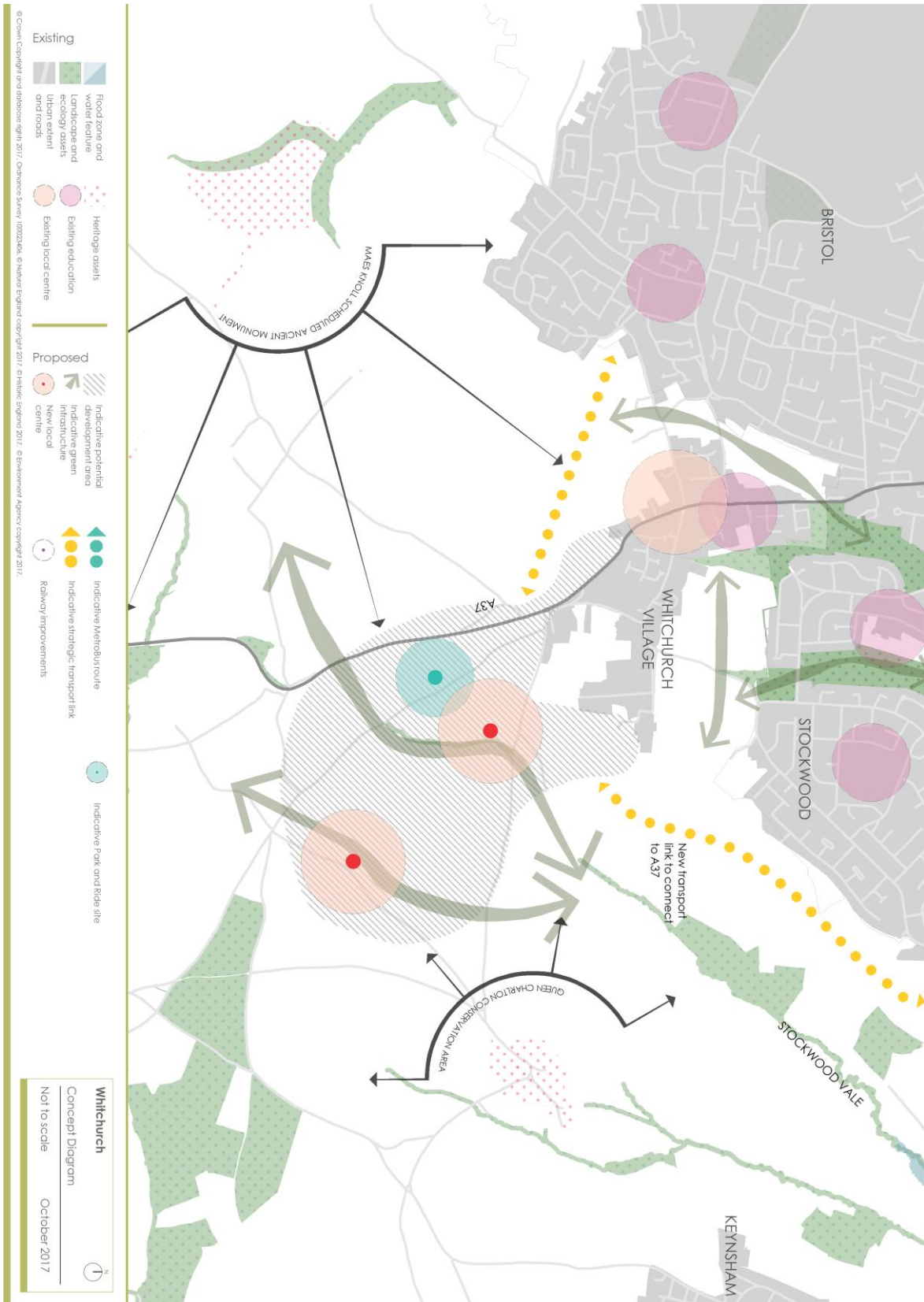
7.1 Trajectory assumed lead in time of 13 yrs, to allow for strategic transportation measures to be funded and programmed. Indicative build out rates: 50-300pa. Slow build out to allow new community to form.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Whitchurch	0	0	0	0	0	0	0	0	0	0	0
	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period	
	0	0	50	150	250	250	300	300	300	1,600	

Post 2036	Total Capacity
900	2,500



# Appendix 1 Concept Diagram



# Strategic Delivery Location – Brislington, Bristol

Date of Issue: October 2017



Location Map

© Crown Copyright and database rights 2017. Ordnance Survey 100023406.

## 1.0 Location characteristics

### 1.1 Site Location (address)

Brislington Park and Ride and land at Bath Road, Brislington, Bristol

### 1.2 Size

Approx. 27ha.

### 1.3 Relevant planning status and designations

Policy BCS5 of the adopted Local Plan identified the use of some Green Belt land in southeast Bristol as a long-term contingency for an urban extension. The broad location of this land was indicated on the Key Diagram and the capacity was not expected to exceed 800 homes. Green Belt, two Minerals Safeguarding Areas, Coal Resource Area, Brislington Park and Ride Expansion - Safeguarded Park and Ride Sites.

### 1.4 Current land use

Agricultural, Park and Ride, Garden Centre

## 2.0 Suitability (Constraints & Opportunities)

### 2.1 Strategic Opportunity

Brislington Strategic Development Location has been identified as capable of accommodating at least 750 dwellings in the plan period (to 2036).

Land at Brislington provides an opportunity for the creation of a new neighbourhood in Bristol with good links to the city centre and the countryside beyond Bristol's boundaries. It is dependent on, and would support the delivery of key transport infrastructure: Callington Road Link / A4 Rapid Transit Scheme; and the relocation of the Brislington Park and Ride to a more optimal location close to the Hicks Gate Roundabout.

### 2.2 Site characteristics

The site comprises Brislington Park and Ride, agricultural fields and Keynsham Garden Centre on the eastern edge of Bristol, south of the Bath Road (A4). The land slopes gently downwards from northwest to southeast continuing into Bath and North East Somerset, where it then slopes up more steeply to the ridge at Stockwood Lane.

### 2.3 Physical & Environmental constraints

**Access:** From the A4, ideally utilising existing Park and Ride Access.

**Landscape & Heritage:** Loss of Green Belt has the potential to impact on valued countryside and the historic landscape, including the network of hedgerows and woodland pockets on the edge of the city and the rural character of Stockwood Lane.

**Pylons:** Pylons run southeast-northwest across the site.

**Ecology:** Much of the site is a Wildlife Corridor. Hedgerows traverse the site. There are records of legally protected species in the vicinity.

**Coal Resources:** There is a potential requirement for extraction of surface coal resources in the area.

**Land contamination:** Potential for contamination from infilled quarry and landfill site to the south on Stockwood Lane.

**Flood Risk:** There is a low risk of flooding from Scotland Bottom Watercourse. Surface water drainage: Mitigating / managing surface water runoff may present significant constraint as Scotland Bottom watercourse has existing flood risk issues upstream and downstream of the site.

#### **2.4 Existing development schemes**

No existing development schemes exist for the site.

#### **2.5 Opportunities**

The land is constrained by Green Belt designation and existing Park and Ride on the site. Otherwise the site is relatively unconstrained land which has been promoted by the landowners. Development provides an opportunity to create a high quality new neighbourhood to the southeast of Bristol benefiting from close proximity to existing services, facilities and communities within Bristol, with good connections to the city centre.

### **3.0 Landuses, capacity, availability & viability**

#### **3.1 Mix of uses – housing led**

Housing (at least 750 dwellings) and open space with further mix of uses to be provided following a detailed master-planning process. The provision of a local centre should be considered.

#### **3.2 Housing typology / density**

Broad range of housing types from 2-5 storeys to create variety and character within the new neighbourhood.

#### **3.3 Capacity**

At least 750 dwellings.

#### **3.4 Availability**

The land is owned by several landowners and the development of the site has been actively promoted in the Call for Sites. Relocation of Brislington Park and Ride to a site within Bath and North East Somerset is required to enable development.

#### **3.5 Viability**

Initial modelling shows the site to be viable, although alternative funding sources will be required to deliver transport infrastructure and the relocation of the Park and Ride site.

### **4.0 Concept Diagram**

See Appendix 1 – Concept Diagram

### **5.0 Draft policy expectations for location**

#### **5.1 Vision**

A new neighbourhood that will provide an attractive, high quality, well-functioning place with good connections to central Bristol, the wider city and the countryside beyond Bristol's boundaries. The development will be designed to promote safety, accessibility and permeability.

- 5.2 Housing capacity (types, typology & affordable housing) and other landuses.**  
It will provide at least 750 dwellings, comprised 35% affordable housing with a full range of types, sizes and tenures.
- 5.3 Appearance**  
Deliver high quality urban design, creating a strong sense of place, responding to the landscape features of the area.
- 5.4 Access**  
Contribution to strategic transport packages including: Callington Road Link / A4 Rapid Transit Scheme; A4 – A37 link; widening of the A4 strategic road network corridor to provide public transport infrastructure inbound and outbound, and an adjacent strategic greenway providing walking and cycling paths with links across Bath Road. Developer contributions required for the removal of traffic from Scotland Lane to create a pedestrian and cyclist only greenway and to extend and improve cycle routes to Bristol, Keynsham, and to the countryside to the south.
- 5.5 Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)**  
The development must retain and incorporate the network of hedgerows into development, including the hedgerows along Scotland Lane. It should provide a linear recreational park incorporating Scotland Bottom watercourse to allow for maintenance of the watercourse, the protection and enhancement of nature conservation and the provision walking and cycling routes. It should also provide a Sustainable Drainage Systems (SuDS) strategy to include surface water runoff management measures to address existing issues on the Scotland Bottom Water Course and Scotland Lane.
- 5.6 Infrastructure requirements (health, education, utilities), etc.**  
The development will be subject to financial contributions to the provision of primary school places off-site. Other infrastructure requirements will be determined by the masterplan. No infrastructure constraints have been currently identified.
- 5.7 Energy/heat**  
The new neighbourhood will aim to be zero carbon standard or produce more renewable energy than it uses.

## 6.0 Barriers to delivery / critical interventions (Achievability Risks)

### 6.1 Identified risks to suitability, availability and achievability

Development of the site is dependent on the:

- Delivery of strategic transportation improvements in advance of development, including:
  - Relocation of Brislington Park & Ride to land near Hicks Gate Roundabout within Bath and North East Somerset;
  - Callington Road Link / A4 Rapid Transit Scheme;
  - Widening of the A4 strategic road network corridor to provide public transport infrastructure inbound and outbound, and an adjacent strategic greenway providing walking and cycling paths;
- Site assembly.

### 6.2 Actions needed to reduce risks

- Prior relocation of Brislington Park and Ride to land near Hicks Gate Roundabout within Bath and North East Somerset;
- Early prioritisation of transportation infrastructure.

## 7.0 Indicative trajectory

### 7.1 Trajectory

Assumed start date of 2031/32, to allow for strategic transportation measures to be funded and programmed. Indicative build out rates: 150 per year.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
<b>Brislington</b>	0	0	0	0	0	0	0	0	0	0	0
	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within plan period	
	0	0	0	0	150	150	150	150	150	750	

Post 2036	Total Capacity
0	750

# Appendix 1 – Concept Diagram



- |                 |                               |                       |                                       |                                     |                               |
|-----------------|-------------------------------|-----------------------|---------------------------------------|-------------------------------------|-------------------------------|
| <b>Existing</b> | Flood zone and water features | Heritage assets       | Indicative potential development area | Indicative MetroBus route           | Indicative Park and Ride site |
|                 | Landscape and ecology assets  | Existing education    | Indicative green infrastructure       | Indicative strategic transport link |                               |
|                 | Urban extent and roads        | Existing local centre | New local centre                      | Railway improvements                |                               |
| <b>Proposed</b> |                               |                       |                                       |                                     |                               |

**Brislington**

Concept Diagram

Not to scale      October 2017

© Crown Copyright and database rights 2017. Ordnance Survey 100023406. © Natural England copyright 2017. © Historic England 2017. © Environment Agency copyright 2017.

# Strategic Development Location – Backwell North Somerset

Date of Issue: October 2017





## 1.0 Location characteristics

### 1.1 Site Location

Land to the west of Backwell.

### 1.2 Size

Approx. 30ha (gross), 18ha net residential area.

### 1.3 Relevant planning status and designations

- Backwell has an adopted Neighbourhood Plan
- Green Belt to the south of Chelvey Lane (not within area of search)

### 1.4 Current land use

Predominantly agricultural.

## 2.0 Suitability (Constraints & Opportunities)

### 2.1 Strategic Opportunity

The JSP - Towards the Emerging Spatial Strategy consultation identified Backwell as accommodating up to a further 800 dwellings in the plan period to 2036. The potential identified through this assessment is revised to 700.

### 2.2 Site characteristics

The site predominantly comprises agricultural fields. The area is undulating with higher ground to the east of Grove Farm. Hedgerows and watercourses are extensive across the area reinforcing the rural character of the area. The open aspect immediately to the south west of the village is considered an important feature supporting the West Town Conservation Area and should inform the design and layout of development on this edge. The area to the southwest of the village is also a critical area for horseshoe bat foraging.

### 2.3 Physical & Environmental constraints

**Heritage:** Listed Buildings including The Grove to the west of Backwell and the West Town Conservation Area have the potential to be impacted as a result of new development. However careful design can address this issue. Grove Farm lies just on the periphery of the proposed development area and could be set within an open space to retain its character and identity.

Setting of West Town Conservation Area likely to affect development potential immediately to the north. Further investigation required on the setting of importance and the relationship to new development, including the potential to maintain open space on field parcels north of the Conservation Area.

**Archaeology:** This area is poorly understood archaeologically, but there is the potential for coal mining heritage to exist in the northeast of this area.

**Ecology:** The area is used by horseshoe bats for foraging and commuting and a particularly sensitive foraging area is identified to the southwest of the area including the field parcels at the junction between West Town Rd and Chelvey Rd<sup>1</sup>. This may lead to specific requirements associated with the new development. The suggestion above associated with heritage may provide some safeguarding of the habitat by retaining a margin of open space.

Opportunities to improve ecological linkages between habitats west of Backwell including woodland at Backwell Hill to habitats in the Nailsea SDL should be explored.

The new strategic highway link from the Nailsea SDL to the west of Backwell is likely to interact with this sensitive foraging area at some point so consultation with Natural England will be required and suitable measures taken to address.

Consideration will be given to the protection of nationally significant species and habitats, notably Section 41 habitats and species. Examples of Section 41 habitats include: species rich lowland meadows, wet woodlands, traditional orchards, and reed beds. Examples of Section 41 species that have suffered sharp declines in population and/or distribution, include the Common Toad, Hedgehog, House Sparrow, Brown Hare and Skylark, as well as many insect species. Wildlife corridors and features such as 'stepping stone habitats' and other natural features need to be incorporated into new development to safeguard key habitats identified within Section 41 of the NERC Act (2006).

**Landscape:** The development area sits on higher land and falls into the J5: Land Yeo and Kenn Rolling Valley Farmland Landscape Character Area of moderate character in good condition.

**Flood risk:** Area of search located in flood zone 1. There are areas of flood risk to the northwest of the area close to the railway. Whilst the potential development area is identified outside of the fluvial/tidal flood risk areas, the volume of surface water run-off has the potential to cause problems elsewhere particularly on lower lying ground. In places, water in these areas drains away slowly and the water table is high with potential for inundation. Further work is therefore required to understand the flood risk issues associated with development and supporting infrastructure, notably roads, and to identify possible options to mitigate any impacts. These may include both site-specific measures e.g. sustainable drainage systems, and more strategic solutions to enable the local environment to more effectively manage and provide long-term storage of surface water.

## 2.4 Existing development schemes

Land at Moor Lane is a proposed residential allocation for 65 units.

## 2.5 Opportunity

Backwell is a village in North Somerset located close to Nailsea, and is located on the main railway corridor and the A370. The village is therefore on the main transport corridor to both Bristol and WSM although improvements would be required to facilitate sustainable development. The area to the west of Backwell offers an opportunity to create a new extension to the village but would require

---

<sup>1</sup> This area is designated as a bat Juvenile Sustenance Zone, see guidance: <http://www.somerset.gov.uk/policies-and-plans/plans/habitat-regulations/>

transport mitigation to avoid further impact upon the Backwell signals junction. A new link road from the A370 west of Backwell would provide a connection to the new Nailsea SDL, connecting to an improved rail and transport interchange, and alleviating Station Road.

## **3.0 Land uses, capacity, availability & viability**

### **3.1 Mix of uses**

At this stage mix of uses is proposed to include residential, potential for small-scale retail, employment and open space. Areas for surface water storage are also envisaged but these could be provided off/near-site.

### **3.2 Employment (type/ha)**

Employment provision and location to be addressed through the local planning process. Assumptions provided here are initial scenarios for testing. North Somerset Council are currently preparing an Employment Land Review that will inform employment planning at the SDLs through the local plan.

Likely to be beneficial to consider employment provision in tandem with the Nailsea SDL including potential to provide a new business site well connected to Nailsea and Backwell station and the new MetroBus route. Initial capacity of 10.5ha across both areas to test further through local planning process.

### **3.3 Housing typology / density**

Medium density village extension. Average 40dph. A relatively higher site coverage is assumed taking into account the size of the potential development area and corresponding reduced requirement for non-residential land uses.

The density selected across the development should respect the existing village character and the rural setting present, particularly taking into account the need to safeguard heritage features, including Grove Farm and West Town Conservation Area.

### **3.4 Capacity**

About 700 units.

### **3.5 Availability**

Development being promoted by a single developer. Additional land likely to be required to deliver strategic transport mitigations.

### **3.6 Viability**

Viability likely to be dependent upon alternative sources of funding. See viability evidence for further information.

## 4.0 Concept Diagram

See Appendix 1 –Concept Diagram

*The Concept Diagrams provide the broad location or area of search for growth in each SDL denoted by the diagonal hatching. The extent of this covers the **gross development area** within which the range of land uses and features necessary to support the new development could potentially be provided, including residential, employment, education, retail, leisure, community uses, green infrastructure, and water storage as required. Development areas to be refined through more detailed work through the local planning process.*

## 5.0 Draft policy expectations for location

### 5.1 Vision

- Opportunity to create an extension of the existing settlement on its western edge, and extend out towards Grove Farm. Development is discouraged beyond Grove Farm to protect the separate identity of Backwell, to prevent coalescence with Chelvey, and to safeguard the setting of the West Town Conservation Area.
- Development is discouraged immediately adjacent to the West End Conservation Area to maintain the open aspect around it that contributes to its character and appearance.

### 5.2 Housing capacity and other land uses

- About 700 units of a range of types and sizes including affordable provision.
- A primary school on 2ha site. Located to be accessible to surrounding neighbourhoods to maximise walking to school opportunities along safe and attractive routes.
- Expansion of existing secondary school.
- Land to be identified to accommodate strategic transport mitigations and other infrastructure including both on-site, near-site and off-site requirements.
- Consider employment provision in association with the Nailsea SDL, in particular scope to provide a new business site well connected to Nailsea station.
- Community uses, to be identified and integrated through masterplanning.

### 5.3 Transport

- The development will contribute to a strategic transport package including a new link to the west of Backwell connecting the A370 to the new strategic highway associated with the Nailsea SDL. Improvements required to Nailsea and Backwell station, MetroBus provision and other local network improvements.
- This is a summary headline of the key transport requirements, is not definitive of the required transport mitigations and further detailed work will be progressed on transport matters. See Joint Transport Study and background papers for further detail.

### 5.4 Green infrastructure

- The approach to green infrastructure should seek to support the rural character of the area for example by creating 'soft' edges to the development blending well into the surrounding countryside and safeguarding heritage features. Multiple roles should be explored for GI including in relation to ecology, recreation, leisure, sustainable drainage and heritage
- Additional strategic green infrastructure to avoid significant impacts to Natura 2000 sites.

## 5.5 Infrastructure requirements

- Suitable drainage infrastructure including to reduce rate of run-off, and provision for long-term storage, and with benefits to water quality. Opportunities to enhance biodiversity should be explored.
- Ecological mitigation including features designed to safeguard habitats and species, retention of key habitats and replacement where necessary.
- Sustainable energy infrastructure including opportunities for heat networks explored early in order that any enabling measures can be secured to enable an efficient and effective delivery. The form and layout of development, and the distribution of land uses is likely to be a key issue in designing the infrastructure. Management of the infrastructure going forward should also be considered.
- Potential requirements for utilities upgrades.

## 5.6 Energy

- Opportunities to secure a zero carbon new settlement will be explored including incorporating a range of sustainable measures, including potential district heating, renewables, energy generation, passivhaus standard homes, homeworking measures and electric car charging facilities etc.

## 6.0 Barriers to delivery - critical interventions

### 6.1 Key identified risks to suitability, availability and achievability

The critical risks are:

- Delivery of strategic **transportation** improvements, to facilitate development, including programming and land assembly.
- Drainage constraints.
- Ecological/ biodiversity impacts.

### 6.2 Key actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)

- Clear understanding of transport requirements, options, and costs supported by funding strategy and means of delivery. Consensus achieved with development partners on schemes required and means of delivery.
- Review of developer contributions and wider funding strategy as part of selection of appropriate development delivery model.
- Ongoing dialogue between flooding agencies. Further investigations are required to understand the existing drainage conditions of the area, the additional impacts of development including volumes of run-off, and the potential options for mitigation if required.

- It is expected that ecological issues can be addressed through masterplanning and the integration of suitable features/safeguarding on or off site. Further engagement with Natural England required to scope additional evidence required. Ecological issues and mitigation, including on the North Somerset and Mendip Bats SAC to be addressed at the strategic scale across the Backwell and Nailsea SDLs. Particular attention required for nearby sensitive foraging habitat.

## 7.0 Indicative trajectory

7.1 Indicative lead-in time to initial completions assumed as 11 years, to allow for strategic transportation measures to be funded and programmed. Indicative build-out rate 50-100 dpa, with development completing within JSP plan period. Average annual build rate of 88 dwellings estimated with peak years of 100 units.

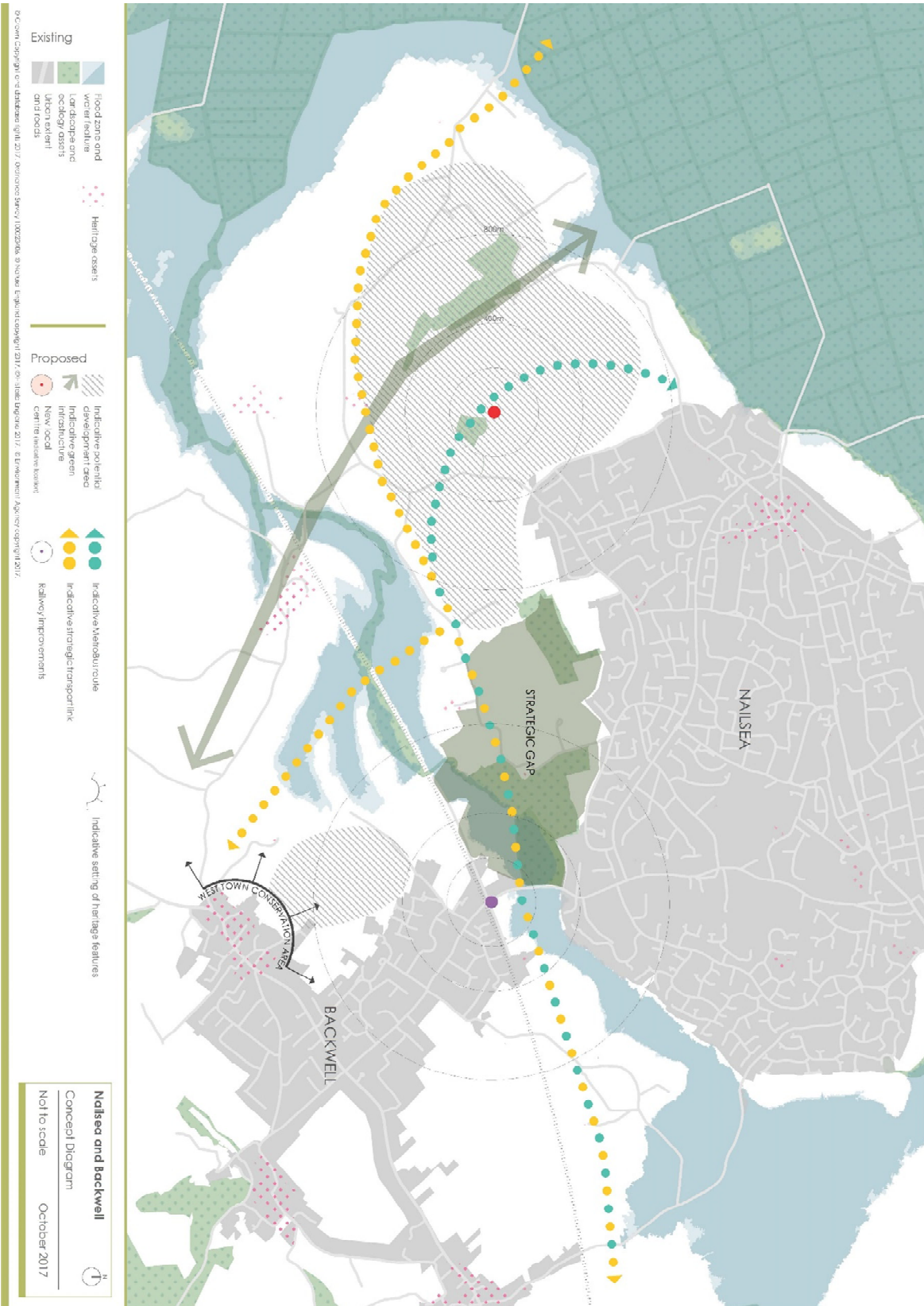
Critical dependencies include provision of strategic transport mitigations including schemes associated with Nailsea SDL, and A370 to Nailsea to the west of Backwell; provision of suitable ecological/environmental mitigation.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
<b>Backwell</b>											

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
	50	75	100	100	100	100	100	75	700

Post 2036	Total Capacity
0	700

# Appendix 1 –Concept Diagram



# Strategic Development Location – Nailsea North Somerset

Date of Issue: October 2017



Location Map

© Crown Copyright and database rights 2017. Ordnance Survey 100023406.



## 1.0 Location characteristics

### 1.1 Site location

Land to the south west of Nailsea.

### 1.2 Size

Approximately 157ha gross, 79ha net residential area.

### 1.3 Relevant planning status and designations

- Land to the east of the area is proposed Strategic Gap (SAP, Policy SA9). This area also includes four smaller areas proposed as Local Green Space (SAP, Policy SA7).

### 1.4 Current land use

Predominantly agricultural/open countryside.

## 2.0 Suitability (Constraints & Opportunities)

### 2.1 Strategic Opportunity

The JSP - Towards the Emerging Spatial Strategy consultation identified Nailsea as accommodating up to a further 2,800 dwellings in the plan period (to 2036). However, further work indicates potential for around 3,300 dwellings depending on the extent of land included in the development and the approach to residential density.

### 2.2 Site characteristics

The site predominantly comprises agricultural fields on gently south facing slopes. The landscape rises from the railway to the southern edge of the town. The landform drops away to the west to the Tickenham and Kenn Moor that has a network of ecologically important watercourses that are designated Site of Special Scientific Interest (SSSI). The ecological attributes of the area are supported by important habitats and features that should be assessed, retained, and or enhanced through new development.

The road network in the area is rural including many single lane carriageways.

### 2.3 Physical & Environmental constraints

**Heritage:** historic coal mining in the area may need to be investigated to ensure any heritage assets/ features are appropriately safeguarded. Listed Buildings at Nailsea Court and Chelvey have the potential to be impacted and key parts of their settings are likely to include land to the south of the proposed growth area. Further investigations should be carried out during subsequent masterplanning (including visual analysis) and appropriate design choices made to safeguard. This could

include maintaining an open aspect around Youngwood Lane/ Netherton Wood Lane, or assuming a lower density form of development on the southern fringe. There may be an opportunity to create green corridors anchored on Nailsea Court and Chelvey that could provide a degree of safeguarding, as well as potential to set up some interesting visual corridors centred on landmark buildings/ features.

**Archaeology:** West End is identified as an area of moderate archaeological potential. It is therefore expected that there could be features of interest that may impact upon development.

**Landscape:** The development area sits on higher land and falls into the K1: Nailsea Farmed Coal Measures Landscape Character Area of strong character in good condition.

A Strategic Gap is proposed to be safeguarded in the emerging North Somerset Site Allocations Plan, and covers a large area of land to the south of Nailsea. It is identified to protect the separate identity of Nailsea and Backwell. The Concept Diagram shows the gap retained in its current proposed form. Options to reconfigure may be considered through the local planning process taking wider strategic development objectives into account including transport and the relationship of new development to the improved Nailsea/Backwell station.

**Ecology:** The area is known to be used by horseshoe bats for foraging and commuting, with activity at the West End area and flight corridors are expected around the south western edge of the town linking south to key habitats around Backwell<sup>1</sup>. The presence of bats may require specific mitigation within new development including for example the inclusion of 'dark corridors'<sup>2</sup>, and retention of habitat areas/ replacement habitat. One opportunity may be to provide a green corridor that links from the west of Backwell (and important bat habitat there), to the south of the Nailsea SDL, through the development on lower ground by Nursebatch and Batch Farm connecting Batch Farm Meadow Wildlife Site, and then through to open countryside to the north. (This suggested network is shown indicatively on the Concept Diagram in Appendix 1). This corridor provides a link to key habitats in the north of the district (woodland on the Tickenham Ridge), and south (woodland at Backwell Hill; important foraging habitat, and habitat near Yatton/ Cleeve).

The nearby SSSI network is also identified as a constraint. Surface water run-off into it is of concern (on water levels and quality) and will likely have to be addressed through an appropriate drainage strategy. Potential development areas to the west of the SDL are of particular relevance given their proximity to the SSSI and may require careful masterplanning to maintain a margin of open land to the SSSI and the inclusion of suitable environmental attenuation features. Lower density (gross and net) may also be appropriate on the western edge reflecting these issues.

Consideration will be given to the protection of nationally significant species and habitats, notably Section 41 habitats and species. Examples of Section 41 habitats include: species rich lowland meadows, wet woodlands, traditional orchards, and

---

<sup>1</sup> The area to the south west of Backwell between Chelvey Road and the A370 is identified to be within a horseshoe bat Juvenile Sustenance Zone, an important foraging habitat for juvenile bats in close range of key roosts. The following links to Somerset County Council website and guidance on North Somerset and Mendip Bats SAC: guidance on development: <http://www.somerset.gov.uk/policies-and-plans/plans/habitat-regulations/>

<sup>2</sup> Dark corridors typically comprise linear green spaces including hedgerow and possibly water features and are designed to specific specifications to maintain a certain level of illuminance.

reed beds. Examples of Section 41 species that have suffered sharp declines in population and/or distribution, include the Common Toad, Hedgehog, House Sparrow, Brown Hare and Skylark, as well as many insect species. Wildlife corridors and features such as 'stepping stone habitats' and other natural features need to be incorporated into new development to safeguard key habitats identified within Section 41 of the NERC Act (2006).

**Flood risk:** Area of search for development located in flood zone 1. Areas of land at risk of tidal / fluvial flooding are located to the west of the area that coincides with a network of man-made watercourses required to manage surface water on the Tickenham and Kenn Moors landscape. Many of these are also designated SSSI and are highly important ecological features. High water table and poor water conveyance are recognised issues affecting the area and may influence the location, scale and suitability of development and the need for measures to ensure there are no adverse impacts on or outside of the development area. Further work is required to understand the flood risk issues associated with development and supporting infrastructure, notably roads, and to identify possible options to mitigate any impacts. These may include both site-specific measures e.g. sustainable drainage, and more strategic solutions to enable the local environment to more effectively manage long-term storage and surface water. This has the potential to provide some betterment to existing areas where poor water conveyance and drainage is an issue. Such works as required have the potential to reduce the overall capacity of the development and whilst there is some allowance for this already built in, further allowance may be required.

The delivery of green corridors through development located to channel surface water should be considered together with maintenance corridors for watercourses. These could have a functional role as well as place making benefits.

**Other constraints:** *National Grid works* - National Grid have a Development Consent Order for a temporary site compound in the area although this only takes a relatively small site. New electricity distribution lines are proposed to the west of the area.

#### *Utilities*

Electricity distribution powerlines cross the site and would require an open corridor to be provided within the masterplan, or alternatively relocation. High Pressure Gas Mains run across the site broadly following the same corridor. These have Health and Safety Executive Consultation Zones associated with them to enable HSE to be consulted on development proposals and to control development within them. There may be restrictions on new roads crossing over these that could result in the need for upgrading or diverting.

## **2.4 Existing development schemes and recent activity**

At the western end of the area are four proposed housing allocations – land at West End for 10; land west of Engine Lane for 183; land south of the Uplands for 50; and land at Youngwood Lane for 170. The first two have planning applications. The latter has a current application for a much larger site.

## **2.5 Opportunity**

Nailsea is one of the four main towns in North Somerset well connected to both Weston-super-Mare and only a short distance away from Bristol. It is located on the

main railway corridor with a station, and the A370. The area to the south west of Nailsea offers an opportunity to create a new development well linked to the existing town supported by improved transport infrastructure including MetroBus connection through the new development, linking through to the existing town, and beyond to Bristol via a new improved Nailsea/Backwell station and interchange. There is potentially an opportunity to achieve a higher density of development given that Nailsea is a main town in North Somerset and the enhanced public transport infrastructure potential.

Development in this area provides the opportunity to deliver new development at a critical mass, using best practice principles, with the full range of new services, facilities and employment opportunities, and an improved public transport offer.

### **3.0 Land uses, capacity, availability & viability**

#### **3.1 Mix of uses**

At this stage the mix of uses is proposed to include residential, mixed employment including office use (B1(a)), rail station improvement and interchange, retail, leisure, recreation, education, various community uses, ecological areas and public open space. Local Centre likely to contain mix of uses with location and scale to be confirmed through local planning process. Key requirement will be to connect MetroBus to the centre. Areas for surface water storage are also envisaged but these could be provided off/near-site.

#### **3.2 Employment (type/ha)**

Employment provision and location to be addressed through the local planning process. Assumptions and suggestions provided here are initial scenarios for testing. North Somerset Council are currently preparing an Employment Land Review that will inform employment planning at the SDLs through the local plan.

Compared to other areas of the West of England and in North Somerset, employment land availability is limited in Nailsea. Improvements to highway infrastructure, the station with improved rail frequency, capacity and MetroBus connectivity, may improve the prospects as a business location.

Potential for new B1 office park well connected to enhanced Nailsea/ Backwell station with MetroBus connectivity. Along with the Backwell SDL, initial scenarios to test are for around 10.5ha of B Class land, comprising 6.3ha B1a, 4.2ha B1b and B1c, that could translate to around 55125sqm and 22,050sqm respectively.

#### **3.3 Housing typology / density**

Medium density urban extension at an average 42dph. A range of densities should be considered to create variety and character within the new settlement. There is potential for the net density to be increased to reflect a higher density core and form of development, and this could bring about benefits to transport and wider sustainability, however this has to balance with environmental constraints. Lower densities likely to be required to west of development in response to context and environmental constraints.

#### **3.4 Capacity**

About 3,300 units.

### 3.5 Availability

Multiple ownerships/ development interests present, and majority of land being actively promoted.

### 3.6 Viability

Viability likely to be dependent upon alternative sources of funding. See viability evidence for further information.

## 4.0 Concept Diagram

See Appendix 1 –Concept Diagram

*The Concept Diagrams provide the broad location or area of search for growth in each SDL denoted by the diagonal hatching. The extent of this covers the **gross development area** within which the range of land uses and features necessary to support the new development could potentially be provided, including residential, employment, education, retail, leisure, community uses, green infrastructure, and water storage as required. Development areas to be refined through more detailed work through the local planning process.*

## 5.0 Draft policy expectations for location

### 5.1 Vision

- Creation of an urban extension to the south west of Nailsea.
- Residential densities considered around 40 to 45dph, applying the principles of ‘graded densities’. Higher densities are encouraged closer to the train station, local centre, and MetroBus route through the development.
- Development around West End, South Common Farm and other parts west of the existing pylon corridor should be at a reduced density and incorporate features to mitigate environmental impacts e.g. open spaces, drainage features as well as to respect the rural setting to the west of the area.
- Integration with existing community with connectivity between new development and existing town.

### 5.2 Housing capacity and other land uses

- About 3,300 units of a range of types and sizes including affordable provision.
- New employment development shall be investigated and masterplanned into the development. In particular opportunities to create a new business site well connected to Nailsea station should be explored with improved parking, MetroBus connectivity, rail frequency and capacity.
- Four primary schools on 2.4ha each. Located to be accessible to surrounding neighbourhoods to maximise walking to school opportunities along safe and attractive routes.
- A secondary school is required on 10ha site including sixth form provision.
- Primary care health facility.

- Mixed use local centre to be provided, to be accessible to surrounding residential neighbourhoods and well connected to main highway network and public transport routes.
- Community uses, to be identified and integrated through masterplanning.
- Land to be identified to accommodate strategic transport mitigations and other infrastructure including both on-site, near-site and off-site requirements.

### **5.3 Transport**

- The development will contribute to a strategic transport package including potential for a new or improved highway link connecting the M5 to the Nailsea SDL, with onwards connection to Bristol. Routes to be multi-modal including MetroBus provision with connection at an enhanced Nailsea and Backwell station. MetroBus connectivity to the station, new local centre, and back into Nailsea are required. Additional improvements to the local network required in addition.
- This is a summary headline of the key transport requirements, is not definitive of the required transport mitigations and further detailed work will be progressed on transport matters. See Joint Transport Study and background papers for further detail.

### **5.4 Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)**

- Approach to green infrastructure to support the rural character of the area for example by creating 'soft' edges to the development blending well into the surrounding countryside particularly at the western end of development. Multiple roles encouraged including in relation to recreation, leisure, environmental and heritage safeguarding and sustainable drainage.
- The GI strategy should also seek to respect the setting of local heritage and provide an ecological corridor, provide for a sustainable drainage system and full range of open space including sports pitches, play areas and allotments.
- Retention of a Strategic Gap at the eastern end of the development between Backwell and Nailsea.
- An area of open space should be considered for retention around the Nursebatch Farm Fields SSSI and safeguarded for its ecological importance.
- Additional strategic green infrastructure to avoid significant impacts to Natura 2000 sites

### **5.5 Infrastructure requirements**

- Suitable drainage infrastructure including to reduce rate of run-off, and provision for long-term storage. In particular, potential impacts on the Tickenham, Nailsea, and Kenn Moors SSSI need to be addressed, including management of water quality and levels. Opportunities to enhance biodiversity should be explored.
- Ecological mitigation including features designed to safeguard habitats and species, retention of key habitats and replacement where necessary.
- Sustainable energy infrastructure including opportunities for heat networks explored early in order that any enabling measures can be secured to enable an efficient and effective delivery. The form and layout of development, and the distribution of land uses is likely to be a key issue in designing the infrastructure. Management of the infrastructure going forward should also be considered.
- Potential requirement for utilities upgrade.

### **5.6 Energy/heat**

- Opportunities to secure a zero carbon new settlement will be explored including incorporating a range of sustainable measures, including potential district heating, renewables, energy generation, passivhaus standard homes, homeworking measures and electric car charging facilities etc.

## 6.0 Barriers to delivery - critical interventions

### 6.1 Key identified risks to suitability, availability and achievability

The critical risks are:

- Un-coordinated piecemeal development that fails to secure necessary improvements to the range of services, facilities and infrastructure requirements and misses the opportunity to secure plan-led, comprehensive development. There may be a particular risk associated with the early release of development that is being promoted independently in the short-term.
- Delivery of strategic transportation improvements delivered at a suitable time to facilitate development within the JSP plan period. Early prioritisation / delivery would be required.
- Drainage constraints linked to impacts on water quality in adjoining SSSI.
- Ecological/ biodiversity impacts.
- Utilities on site may affect viability and capacity. Potential to hinder optimum development layout.

### 6.2 Key actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)

- Collaborative approach between public and private partners to achieve planning policy framework through local plan process, subsequent masterplanning and development management processes to secure consensus on phasing of infrastructure and approach to delivery.
- Clear understanding of transport requirements, options, and costs supported by funding strategy and means of delivery. Consensus achieved with development partners on schemes required and means of delivery. Opportunities to link distinct sections of the transport route to distinct phases of development should be explored. This is expected to help support their delivery. Pursue opportunities for funding.
- Review of developer contributions and wider funding strategy as part of selection of appropriate development delivery model.
- Ongoing dialogue between flooding agencies. Further investigations are required to understand the existing drainage conditions of the area, the additional impacts of development including volumes of run-off, and the potential options for mitigation if required.
- It is expected that ecological issues can be addressed through masterplanning and the integration of suitable features/safeguarding on or off site. Further engagement with Natural England required to scope additional evidence required. Ecological issues, including impacts on the North Somerset and Mendip Bats SAC, to be addressed on a strategic basis across the Nailsea and Backwell SDLs.
- Further dialogue with utilities and testing of options through masterplanning process.
- Ongoing engagement between the LPA and development interests is necessary, with ongoing mechanisms for engagement identified. Should consider models of delivery at an early stage, legal aspects and matters such as equalisation of land

values to ensure the most effective masterplan and infrastructure provision can be achieved.

## 7.0 Indicative trajectory

7.1 Indicative lead-in time of 9 years assumed, to allow for strategic transportation measures to be funded and programmed; land to be assembled; and suitable delivery vehicle/structures selected, setup and implemented. Indicative build-out rate of 50-300 dpa. It is currently anticipated that the entire planned development will extend beyond the JSP plan period by an estimated 725. An average annual rate of 234 dwellings is estimated with a peak-year rate of 300 dwellings.

Critical dependencies include provision of strategic transport mitigations; achieving a critical mass of development required to support non-car modes including MetroBus; provision of suitable ecological/environmental mitigation including surface water storage, possible replacement habitat; land assembly, and legal/delivery structures in place.

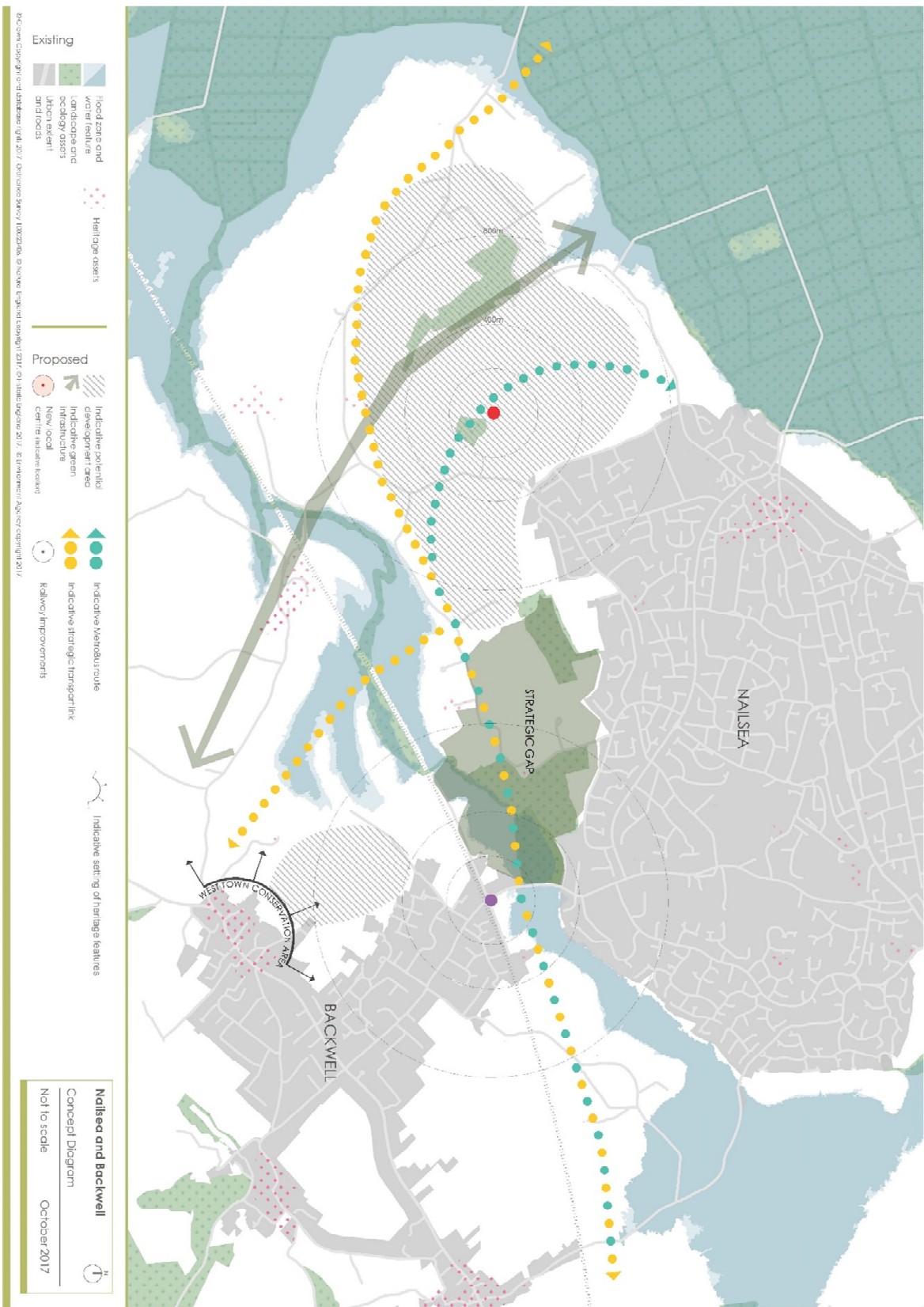
	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
<b>Nailsea</b>										50	75

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
150	200	300	300	300	300	300	300	300	2575

Post 2036	Total Capacity
725	3300



# Appendix 1 – Concept Diagram



# Strategic Development Location – M5 to A38 Corridor - Churchill North Somerset

Date of Issue: October 2017



Location Map

© Crown Copyright and database rights 2017. Ordnance Survey 100023406.

## 1.0 Location characteristics

### 1.1 Site Location

Land to the northwest of Churchill and Langford.

### 1.2 Size

Approx. 165ha gross, 85ha net residential area.

### 1.3 Relevant planning status and designations

- Proposed Local Green Space designation within Langford – *Land to the West of Rowan Way*.

### 1.4 Current land use

Predominantly in agricultural use.

## 2.0 Suitability (Constraints & Opportunities)

### 2.1 Strategic Opportunity

The JSP - Towards the Emerging Spatial Strategy consultation identified the M5 to A38 Corridor as accommodating up to a further 5,400 dwellings in the plan period to 2036. The background evidence (*Assessment of Strategic Development Locations Beyond Settlement Boundaries*) identified Churchill along this corridor as a location with strategic development potential to be explored further. Further work has identified potential for around 2,800 dwellings at Churchill/Langford that, alongside the potential at Banwell, has reduced the overall dwelling potential on the M5 to A38 Corridor to around 4,700 dwellings.

### 2.2 Site characteristics

Location predominantly comprises agricultural fields, on undulating land, with a high point around Windmill Hill at around 75m AOD with significant archaeological interest. Hedgerows and watercourses are extensive across the area reinforcing the rural character. King Road passes through the site as well as a number of footpaths. Churchill Academy and Sixth Form is located close to the area off of Churchill Green. Various watercourses run in a northwest direction across the site including Churchill rhyne.

### 2.3 Physical & Environmental constraints

**Heritage:** the listed Church of St John the Baptist requires sensitive treatment and its setting may extend some way towards Langford. Any development will need to be sensitive to this feature that may have a significant influence on development capacity achievable in the vicinity. Churchill Green open space immediately to the north of the church likely to have key role in this regard occupying a field parcel bounded by trees and forming an immediate setting to the church and so it would be desirable to retain undeveloped.

The Concept Diagram shows an indicative green corridor linking from Windmill Hill to the west providing some separation of the church from development parcels to the north. Further more detailed visual appraisal is required to ascertain the setting

of importance and the appropriate treatment and layout of any nearby development through more detailed masterplanning.

**Archaeology:** Area has high archaeological potential. An Iron Age univallate hillfort and Roman Fort is identified at Windmill Hill as well as other notable features of significance in the area generally. Further investigations necessary.

**Landscape:** The development area sits on higher land and falls into the J2: River Yeo Rolling Valley Farmland Landscape Character Area of moderate character in good condition. It would be desirable to create distinct blocks of development that respect the existing character and form of settlement along the Mendip Hills edge rather than expanses of linear development. This can help to maintain the rural character. The form of development and interaction with surrounding countryside will be important considerations in creating new settlement that blends well with the landscape and will be an important consideration for masterplanning in due course.

#### *Mendip Hills AONB*

Although the site is located outside of the AONB, the potential for adverse impact on it is present. The landscape strategy may be beneficial in helping to accommodate development with minimal impact on the AONB.

**Ecology:** The area is likely to be utilised by horseshoe bats<sup>1</sup> for foraging and commuting particularly from the south of the village to the east and north connecting woodland areas and the Langford Brook. The area has numerous linear hedgerows that are likely to assist bat commuting and some with watercourses providing opportunities for foraging. This may lead to specific requirements associated with the new development including for example the inclusion of 'dark corridors', retention of key habitats, and other measures to safeguard bats and their habitats. One opportunity may be to provide a green corridor from open countryside to the west, connecting to Windmill Hill and woodland features there<sup>2</sup>, and then linking to open countryside and woodland features to the south (shown indicatively on the Concept Diagram). The design of the new link road should also seek to minimise impacts, including for example tree planting with canopy and low level lighting subject to suitability and acceptability.

Consideration will be given to the protection of nationally significant species and habitats, notably Section 41 habitats and species. Examples of Section 41 habitats include: species rich lowland meadows, wet woodlands, traditional orchards, and reed beds. Examples of Section 41 species that have suffered sharp declines in population and/or distribution, include the Common Toad, Hedgehog, House Sparrow, Brown Hare and Skylark, as well as many insect species. Wildlife corridors and features such as 'stepping stone habitats' and other natural features need to be incorporated into new development to safeguard key habitats identified within Section 41 of the NERC Act (2006).

**Flood risk:** Area of search for development located in flood zone 1. Areas of land at risk of tidal/fluvial flooding are located to the north of the area (outside of the area of search for development) that coincides with a network of man-made watercourses required to manage surface water on the levels landscape, as well as

---

<sup>1</sup> Greater and Lesser Horseshoe Bats are Annex II species notified as mobile qualifying features of the Mendip Limestone Grasslands Special Area of Conservation (SAC) and the North Somerset and Mendip Bats SAC designated under the EC Habitats Directive as part of the Natura 2000 network of European Sites

<sup>2</sup> The area surrounding Windmill Hill is identified as a biodiversity enhancement area.

key watercourses including the Congresbury Yeo. High water table and poor water conveyance are recognised issues affecting the area that would influence the location, scale and suitability of development and the need for measures to ensure there are no adverse impacts on or outside of the development area.

A strategy for managing surface water will be required. This may include both site-specific measures e.g. suds, and more strategic solutions to enable the local environment to more effectively manage surface water. This has the potential to provide some betterment to existing areas where poor water conveyance and drainage is an issue. Flood catchment modelling may be required in due course.

A series of watercourses flow into the site including Churchill Rhyne and another to the north between Brinsea Farm and Ladymeade Farm. Potential to retain these within the green infrastructure network for enhanced biodiversity value.

**Other:** The Proposed Southern Strategic Support Main Pipeline runs close to the area on its western edge crossing Brinsea and then broadly following the existing pylon corridor route to Banwell Riverside. This is currently being delivered (planning application ref: 16/P/1095/F2). This may provide some constraint on development, as does the electricity pylon corridor both of which may have easement or wayleave associated. These features form a potential constraint to development beyond, and would have to be suitably addressed through detailed masterplanning

## **2.4 Existing development schemes**

The area has four proposed housing allocations; Pudding Pie Lane for 141; Says Lane for 43; land south of Bristol Road for 41; and Pudding Pie Lane (west) for 35. The first two have planning consent, the others a planning application in progress.

## **2.5 Opportunity**

Churchill and Langford are settlements located some 3-4 miles east of Weston-super-Mare and approx. 5 miles from Bristol Airport, and are two of the multiple settlements located on the main A371/A368/A38 highway corridor. The area to the northwest of Churchill offers an opportunity to create a new garden village well linked to existing settlements and supported by improved transport infrastructure to mitigate impact upon the transport network. This provides an opportunity to take traffic away from existing routes/villages. Green space would surround the garden village, some remaining in existing agricultural use and also providing opportunity for leisure and recreation, ecological mitigation and enhancement, heritage and archaeological safeguarding, and environmental mitigation.

# **3.0 Land uses, capacity, availability & viability**

## **3.1 Mix of uses**

At this stage would be expected to include residential, employment (mixed B Class, and non-B Class), retail, leisure, recreation, education and open space. Local Centre likely to contain mix of uses with location and scale to be confirmed through local planning process. Areas for surface water storage are also envisaged but these could be provided off/near-site, and should be designed to maximise wildlife value.

### 3.2 Employment (type/ha)

Employment provision and location to be addressed through the local planning process. Assumptions and suggestions provided here are initial scenarios for testing. North Somerset Council are currently preparing an Employment Land Review that will inform employment planning at the SDLs through the local plan.

This area is on the main A38 corridor with good links to Bristol Airport. Improvements to the transport network in this area may provide opportunities for employment development, including business opportunities associated with the airport. Potential to explore employment land opportunities close to the existing mushroom farm at Stock Lane to create a consolidated business park.

Potential for mixed B class employment well connected to new strategic transport routes. Initial scenarios to test are for around 7.4ha of B Class land that could translate to around 40800sqm.

### 3.3 Housing typology / density

Low Density Garden Village. Average net residential densities of around 30 to 40dph reflecting rural character of area and potential need for lower density development. A range of densities is recommended to create variety and character within the new settlement to respond to context, and to secure higher densities around centres of activity and public transport nodes.

### 3.4 Capacity

About 2,800 units.

### 3.5 Availability

Multiple landownerships present.

Additional land is likely to be required to deliver transport mitigations and other off-site infrastructure.

### 3.6 Viability

Viability likely to be dependent upon alternative sources of funding. See viability evidence for further information.

## 4.0 Concept Diagram

See Appendix 1 – Concept Diagram

*The Concept Diagrams provide the broad location or area of search for growth in each SDL denoted by the diagonal hatching. The extent of this covers the **gross development area** within which the range of land uses and features necessary to support the new development could potentially be provided, including residential, employment, education, retail, leisure, community uses, green infrastructure, and water storage as required. Development areas to be refined through more detailed work through the local planning process.*

## 5.0 Draft policy expectations for location

### 5.1 Vision

- Development of a new garden village to the north west of Churchill supported by new transport infrastructure.
- Form of development should respect the settlement character of the area and the rural characteristics present. In particular opportunities to safeguard the separate identity of Langford and Churchill should be explored alongside opportunities to create effective transport linkages between areas of settlement.
- Environmental enhancement and functioning of existing settlements once transport improvements are in place.

### 5.2 Housing capacity and other land uses

- About 2,800 units of a range of types and sizes including affordable provision.
- New employment development shall be investigated and masterplanned into the development. Opportunities to link to the new transport infrastructure should be explored and the scope to support airport related businesses.
- Mixed use local centre to be provided, to be accessible to surrounding residential neighbourhoods and well connected to main highway network and public transport routes.
- Community uses, to be identified and integrated through masterplanning.
- Three primary schools of 2.4ha each to include early year's provision. Located to be accessible to surrounding neighbourhoods to maximise walking to school opportunities along safe and attractive routes.
- A secondary school is required for this and the Banwell SDL with location to be defined through more detailed masterplanning and consideration of educational requirements across North Somerset.
- Land to be identified to accommodate strategic transport mitigations and other infrastructure including both on-site, near-site and off-site requirements.
- Primary health care facility.

### 5.3 Transport

- The development will contribute to a strategic transport package including a new distributor route connecting to the A38, and connection and improvement to the A368/A38 junction. This is a package of transport works with an early phase identified as the Banwell Bypass. Additional improvements to existing network also required.
- This is a summary headline of the key transport requirements, is not definitive of the required transport mitigations and further detailed work will be progressed on transport matters. See Joint Transport Study and background papers for further detail.

### 5.4 Green infrastructure

- The principle of multi-functional and interconnected green infrastructure should be pursued to offer multiple benefits including to wildlife and biodiversity, recreation, and flood attenuation and to include requirements for delivery, future maintenance and management.

- The approach to green infrastructure should seek to support the rural character for example by creating 'soft' edges to the development blending well into the surrounding countryside. This is likely to be important in protecting the setting of the AONB.
- Windmill Hill forms a key feature of landscape, heritage and ecological value that should form a focal point within the network of green infrastructure and safeguard the setting of the historic village of Churchill. Churchill Green also considered to have a key role within the green network and is considered to form an important part of the setting to the church.
- Identification of specific uses on green spaces surrounding new settlement particularly between existing settlements including potential for strategic gaps.
- Additional strategic green infrastructure to avoid significant impacts to Natura 2000 sites

## 5.5 Infrastructure requirements

- Suitable drainage infrastructure including to reduce rate of run-off, and provision for long-term storage, and with benefits to water quality. Opportunities to enhance biodiversity should be explored.
- Ecological mitigation including features designed to safeguard habitats and species, retention of key habitats and replacement where necessary.
- Sustainable energy infrastructure including opportunities for heat networks explored early in order that any enabling measures can be secured to enable an efficient and effective delivery. The form and layout of development, and the distribution of land uses is likely to be a key issue in designing the infrastructure. Management of the infrastructure going forward should also be considered.
- Potential requirements for utilities upgrades.

## 5.6 Energy

- Opportunities to secure a zero carbon new settlement will be explored including incorporating a range of sustainable measures, including potential district heating, renewables, energy generation, passivhaus standard homes, homeworking measures and electric car charging facilities etc.

## 6.0 Barriers to delivery - critical interventions

### 6.1 Key identified risks to suitability, availability and achievability

The critical risks are:

- Un-coordinated piecemeal development that fails to secure in a coordinated way, the necessary provision and improvement of services, facilities and infrastructure.
- Delivery of strategic transportation improvements delivered at a suitable time to facilitate development within the JSP plan period. Early prioritisation / delivery required to enable development to be delivered. Land assembly for highway outside of the SDL will be critical to enabling development.
- Drainage constraints.
- Ecological/ biodiversity impacts.
- Impact on the AONB.



**6.2 Key actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)**

- Collaborative approach between public and private partners to achieve planning policy framework through local plan process, subsequent masterplanning and development management processes to secure consensus on phasing of infrastructure and approach to delivery.
- Clear understanding of transport requirements, options, and costs supported by funding strategy and means of delivery. Consensus achieved with development partners on schemes required and means of delivery. Pursue opportunities for funding bids where available.
- Consider utilising New Towns legislation to deliver development effectively with required infrastructure. Review of developer contributions and wider funding strategy as part of selection of appropriate development delivery model.
- Ongoing dialogue between flooding agencies. Further investigations are required to understand the existing drainage conditions of the area, the additional impacts of development including volumes of run-off, and the potential options for mitigation if required.
- It is expected that ecological issues can be addressed through masterplanning and the integration of suitable features/safeguarding on or off site. Further engagement with Natural England required to scope additional evidence required. Ecological issues to be addressed on a strategic basis across SDL.
- Further consideration of landscape strategy including in consultation with the Mendip Hills AONB unit.

**7.0 Indicative trajectory**

7.1 Assumed lead in time of 9 years, to allow for strategic transportation measures to be funded and programmed, preparatory stages e.g. site acquisition, and setting in place of the Development Plan. Indicative build-out rate of 50-300 dpa. Estimated annual average rate of 243 dwellings.

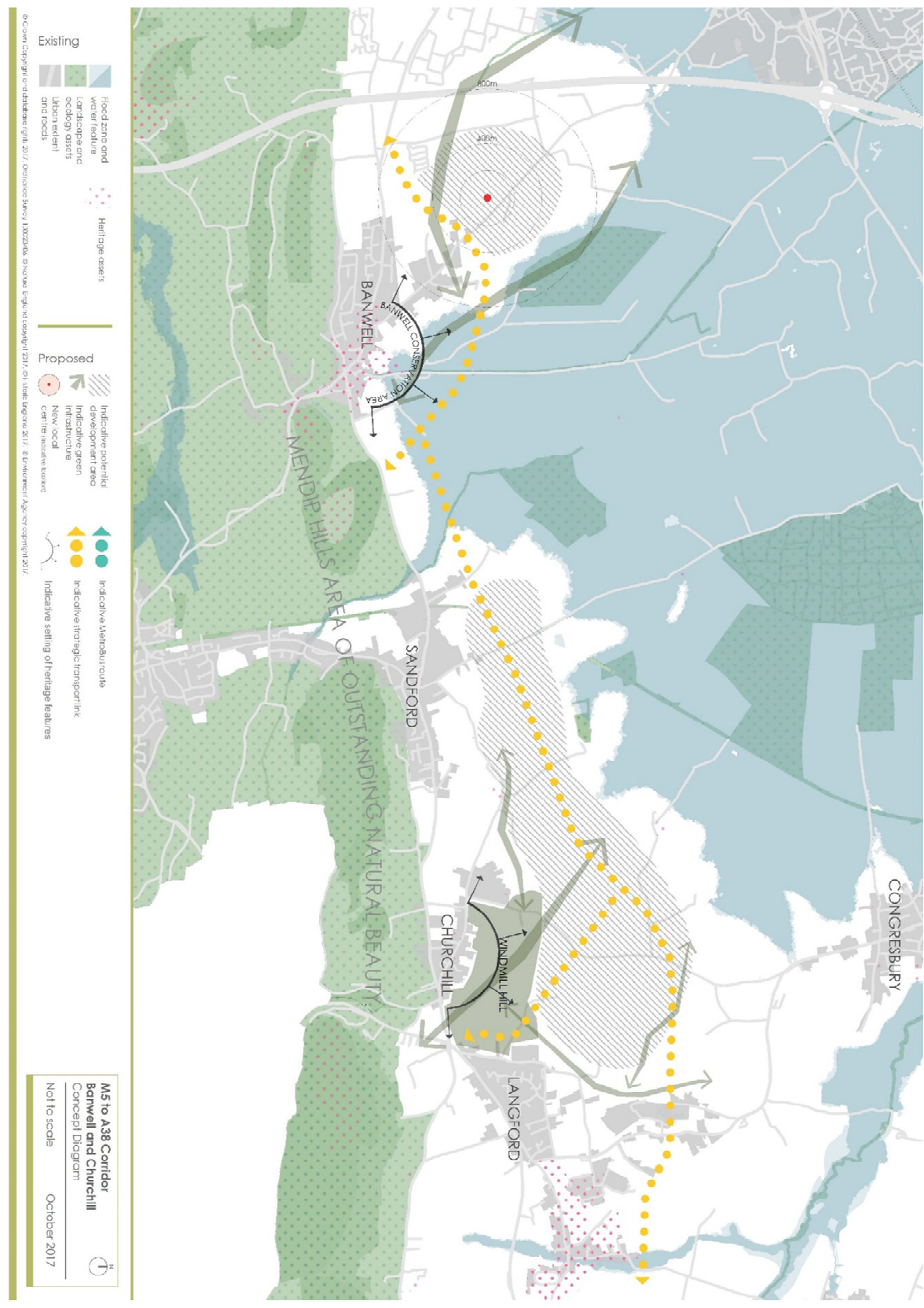
Critical dependencies include: provision of strategic transport mitigations; funding measures identified and in place during lead-in phase; provision of suitable ecological/environmental mitigation; and land assembly including for enabling infrastructure; legal/delivery structures in place.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
<b>Churchill</b>										50	75

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
150	300	300	300	300	300	300	300	300	2675

Post 2036	Total Capacity
125	2800

# Appendix 1 –Concept Diagram



# Strategic Development Location – M5 to A38 Corridor - Banwell North Somerset

Date of Issue: October 2017



Location Map

© Crown Copyright and database rights 2017, Ordnance Survey 100023406.

## 1.0 Location characteristics

### 1.1 Site Location

Land northwest of Banwell.

### 1.2 Size

Approx. 106 ha gross, 54ha net residential area.

### 1.3 Relevant planning status and designations

- Mendip Hills Area of Outstanding Natural Beauty (AONB) to the south, wildlife site to the east, and heritage designations to the southeast. Areas of Priority Habitat are present to the east.
- Village has two Local Green Space designations, one at Riverside.
- The Banwell bypass route is a safeguarded scheme in the Sites and Policies Plan, Part 1: Development Management Policies.

### 1.4 Current land use

Predominantly agricultural.

## 2.0 Suitability (Constraints & Opportunities)

### 2.1 Strategic Opportunity

The JSP - Towards the Emerging Spatial Strategy consultation identified the M5 to A38 Corridor as accommodating up to a further 5,400 dwellings in the plan period to 2036. The background evidence (Assessment of Strategic Development Locations Beyond Settlement Boundaries) identified Banwell along this corridor as a location with strategic development potential to be explored further. Further work has identified potential for around 1,900 dwellings at Banwell that, alongside the potential at Churchill/Langford, has reduced the overall dwelling potential on the M5 to A38 Corridor to around 4,700 dwellings.

### 2.2 Site characteristics

The site is characterised by open, and gently undulating pasture land set against the backdrop of the lower slopes of the AONB. The character of the area to the south of Banwell is heavily influenced by the steep, often wooded slopes of the AONB.

To the east the area drops down to the Locking and Banwell moors landscape and gently rises to the north at Woolvers Hill. The M5 motorway is a dominant feature to the west of the area set in a cutting in parts. To the west of Stonebridge, a shallow valley runs towards the motorway. Wolverhill Road passes through the site linking Banwell back into WsM near J21 of the M5.

### 2.3 Physical & Environmental constraints

**Heritage:** area to the east of the village has a particularly rich heritage including a former Abbey, Scheduled Monument, Conservation Area and various listed buildings. The Concept Diagram illustrates an indicative setting to these features.

**Archaeology:** The area, particularly around Stonebridge and Wolvershill Road, is identified as having moderate to high archaeological value including nationally significant Roman archaeology. The area between Riverside and East Street has the potential for medieval archaeology, palaeochannels and waterlogged archaeology. It is therefore expected that there would be features of interest that may impact upon development potential.

**Landscape:** The development area sits on higher land and falls into the J2: River Yeo Rolling Valley Farmland Landscape Character Area of moderate character in good condition. Lower lying landscape to east – Locking and Banwell Moors should be avoided due to its flood risk status. It would be desirable to create distinct blocks of development that respect the existing character and form of existing settlements along the Mendip Hills edge rather than expanses of linear development.

#### *Mendip Hills AONB*

Although the site is located outside of the AONB, the potential for adverse impact on it is present. The landscape strategy may be beneficial in helping to accommodate development with minimal impact on the AONB.

**Ecology:** The area is likely to be utilised by horseshoe bats for foraging and commuting particularly to the south of the village. The Banwell Ochre Caves are a key feature nearby and one of the component SAC sites<sup>1</sup>. The inclusion of specific features within the new development including for example ‘dark corridors’<sup>2</sup> should be considered as part of a wider ecological strategy including potential for replacement habitat and safeguarding and enhancement of key habitats.

Opportunity to provide a green corridor to the west of Stonebridge that links to the Grumblepill Rhyne corridor at Parklands Village (shown indicatively in the Concept Diagram). This feature would track a depression in the landscape potentially incorporating water management features.

Consideration will be given to the protection of nationally significant species and habitats, notably Section 41 habitats and species. Examples of Section 41 habitats include: species rich lowland meadows, wet woodlands, traditional orchards, and reed beds. Examples of Section 41 species that have suffered sharp declines in population and/or distribution, include the Common Toad, Hedgehog, House Sparrow, Brown Hare and Skylark, as well as many insect species. Wildlife corridors and features such as ‘stepping stone habitats’ and other natural features need to be incorporated into new development to safeguard key habitats identified within Section 41 of the NERC Act (2006).

**Flood risk:** The area of search for development is located in flood zone 1. Impacts on flood risk elsewhere need to be considered. Further work is therefore required to understand the flood risk issues associated with development and supporting infrastructure, to identify possible options to mitigate any impacts. These may include both site-specific measures e.g. sustainable drainage systems (taking into account infiltration constraints), and more strategic solutions to enable the local

---

<sup>1</sup> Special Areas of Conservation – Areas given special protection under the EU Habitats Directive which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010.

<sup>2</sup> Dark corridors typically comprise linear green spaces including hedgerow and possibly water features and are designed to specific specifications to maintain a certain level of illuminance.

environment to more effectively manage and provide long-term storage of surface water.

**Other:** The Proposed Southern Strategic Support Main Pipeline (water) runs through the area on its eastern edge up to Riverside. This is currently being delivered (planning application ref: 16/P/1095/F2). This coupled with other constraints on this part of the site make this a particularly sensitive area.

#### **2.4 Existing development schemes**

To the east of the village is a proposed housing allocation, east of Wolvershill Road for 44 dwellings (outline approved subject to legal agreement).

#### **2.5 Opportunity**

Banwell is located just outside Weston-super-Mare (WsM) on the A371. This main route through the village is subject to significant congestion at peak times exacerbated by a pinch point on the network at West Street. Strategic development would be required to be supported (and would contribute to) new transport infrastructure including the Banwell Bypass. Potential is identified to create a new garden village to the northwest of Banwell.

### **3.0 Land uses, capacity, availability & viability**

#### **3.1 Mix of uses**

At this stage the mix of uses is expected to include residential, employment (including distribution (B8)), small-scale retail, leisure and recreation, education and open space. Local Centre likely to contain mix of uses with location and scale to be confirmed through local planning process. Areas for surface water storage are also envisaged that could be required on, off and / or near site.

#### **3.2 Employment (type/ha)**

Employment provision and location to be addressed through the local planning process. Assumptions and suggestions provided here are initial scenarios for testing. North Somerset Council are currently preparing an Employment Land Review that will inform employment planning at the SDLs through the local plan.

The area is located close to Weston-super-Mare and the Junction 21 Enterprise Area where there is a significant scale of employment development planned. The role this SDL may play needs to be addressed further in this context.

Potential for distribution type businesses well connected to the M5 and the new Banwell Bypass. Initial scenario to test for around 5ha of B Class land that could translate to around 15,000sqm.

#### **3.3 Housing typology / density**

Low to medium density Garden Village. Average net residential densities of around 30 to 40dph. A range of densities are recommended to create variety and character within the new settlement and to respond appropriately to context and environmental constraints.

### 3.4 Capacity

About 1,900 units.

### 3.5 Availability

Multiple landownerships present, although majority of land in area of search under control of single developer.

Various other sites submitted in area totalling around 37.1 ha.

Additional land required to deliver transport interventions and other infrastructure necessary to support development.

### 3.6 Viability

Viability likely to be dependent upon alternative sources of funding. See viability evidence for further information.

## 4.0 Concept Diagram

See Appendix 1 –Concept Diagram

*The Concept Diagrams provide the broad location or area of search for growth in each SDL denoted by the diagonal hatching. The extent of this covers the **gross development area** within which the range of land uses and features necessary to support the new development could potentially be provided, including residential, employment, education, retail, leisure, community uses, green infrastructure, and water storage as required. Development areas to be refined through more detailed work through the local planning process.*

## 5.0 Draft policy expectations for location

### 5.1 Vision

- To create a new garden village supported by the phased delivery of transport infrastructure.
- The form of development should seek to respect the character and separate identity of Banwell and respond sensitively to the semi-rural context.
- Development form to avoid linear expanses of development. Blocks of development sitting within landscape to be explored further through masterplanning.
- Improved connectivity between WSM, the airport and Bristol.

### 5.2 Housing capacity and other land uses

- About 1,900 units of a range of types and sizes including affordable provision.
- New employment development shall be investigated and masterplanned into the development. Opportunities to link to new transport infrastructure should be explored and the scope to support distribution type businesses.
- Community uses, to be identified and integrated through masterplanning.
- Two primary schools, one of 2.4ha and the other of 3.4ha for future expansion, both including early years provision. Located to be accessible to



surrounding neighbourhoods to maximise walking to school opportunities along safe and attractive routes.

- A secondary school is required for this and the Churchill SDL with location to be defined through more detailed masterplanning, and consideration of education requirements across North Somerset.
- Land to be identified to accommodate strategic transport mitigations and other infrastructure including both on-site, near-site and off-site requirements.
- Primary care health facility.
- Mixed use local centre to be provided, to be accessible to surrounding residential neighbourhoods and well connected to main highway network and public transport routes.

### **5.3 Transport**

- The development will contribute to strategic transport including a new link between the M5 and the A38 comprising a package of schemes. To include a new motorway junction (J21a), the Banwell Bypass, and an onward connection to the A38, east of Langford. Additional improvements required to local network.
- This is a summary headline of the key transport requirements, is not definitive of the required transport mitigations and further detailed work will be progressed on transport matters. See Joint Transport Study and background papers for further detail.

### **5.4 Green Infrastructure**

- The principle of multi-functional and interconnected green infrastructure should be pursued to offer multiple benefits including to wildlife and biodiversity, recreation, and flood attenuation and to include requirements for delivery, future maintenance and management.
- Investigation of an area of open space between Banwell and the proposed bypass linking through to open countryside to the east.
- The approach to green infrastructure should seek to support the rural character of the area for example by creating 'soft' edges to the development, blending well into the surrounding countryside. Green infrastructure is also likely to be important in protecting the setting of heritage features, and the setting of the AONB.
- A green corridor linking Stonebridge to the Grumblepill Rhyne at Parklands Village should be investigated including its use for bat foraging and commuting and surface water management. This could form a further phase of the dark corridor already established at Parklands Village.
- Additional strategic green infrastructure to avoid significant impacts to Natura 2000 sites.

### **5.5 Infrastructure requirements**

- Ecological mitigation including features designed to safeguard habitats and species, retention of key habitats and replacement where necessary.
- Suitable drainage infrastructure including to reduce rate of run-off, and provision for long-term storage, and with benefits to water quality. Opportunities to enhance biodiversity should be explored. Selected strategy to take into account constraints on infiltration drainage.

- Sustainable energy infrastructure including opportunities for heat networks explored early in order that any enabling measures can be secured to enable an efficient and effective delivery. The form and layout of development, and the distribution of land uses is likely to be a key issue in designing the infrastructure. Management of the infrastructure going forward should also be considered.
- Potential requirements for utilities upgrades.

## 5.6 Energy

- Opportunities to secure a zero carbon new settlement will be explored including incorporating a range of sustainable measures, including potential district heating, renewables, energy generation, passivhaus standard homes, homeworking measures and electric car charging facilities etc.

## 6.0 Barriers to delivery - critical interventions

### 6.1 Key identified risks to suitability, availability and achievability

The critical risks are:

- Un-coordinated piecemeal development that fails to secure necessary improvements to the range of services, facilities and infrastructure requirements. Pressure to bring forward sites earlier than planned has the potential to lead to ineffective development and could undermine a joined-up, masterplan-led approach to development. This could lead to land uses being poorly arranged.
- Delivery of strategic **transportation** improvements delivered at a suitable time to facilitate development within the JSP plan period. Early prioritisation / delivery required, particularly for the Banwell Bypass section.
- Drainage constraints.
- Ecological/ biodiversity impacts.
- Heritage issues are significant to the east of the village and should be carefully addressed.
- Impact on the AONB.
- Land assembly – ensuring sufficient land is assembled to support development and deliver enabling infrastructure.

### 6.2 Key actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)

- Collaborative approach between public and private partners to achieve planning policy framework through local plan process, masterplanning and development management processes to secure consensus on phasing of infrastructure and approach to delivery.
- Clear understanding of transport requirements, options, and costs supported by funding strategy and means of delivery. Consensus achieved with development partners on schemes required and means of delivery including land assembly, particularly for Banwell Bypass. Pursue opportunities for funding.
- Review of developer contributions and wider funding strategy as part of selection of appropriate development delivery model. Some form of equalisation agreement is likely to be required to support an equitable return for land forming part of the overall development.

- Ongoing dialogue between flooding agencies. Further investigations are required to understand the existing drainage conditions of the area, the additional impacts of development including volumes of run-off, and the potential options for mitigation if required.
- It is expected that ecological issues can be addressed through masterplanning and the integration of suitable features/safeguarding on or off site. Further engagement with Natural England required to scope additional evidence required. Ecological issues to be addressed on a strategic basis across SDL.
- Further consideration of landscape strategy including in consultation with the Mendip Hills AONB unit.
- Further dialogue with Heritage England to ensure proposals provide adequate safeguarding of heritage assets. Requirement for heritage report where SDL relates to heritage assets.

## 7.0 Indicative trajectory

7.1 Indicative lead-in time to initial completions assumed 8 years to allow for strategic transportation measures to be funded and programmed. Lead-in largely dictated by transport matters including requirements for further technical work and land acquisition. Indicative build-out rate dependant on number of development partners- assuming 50 per sales outlet per annum. Estimated annual average rate of 158 dwellings with peak years delivering 200 per year.

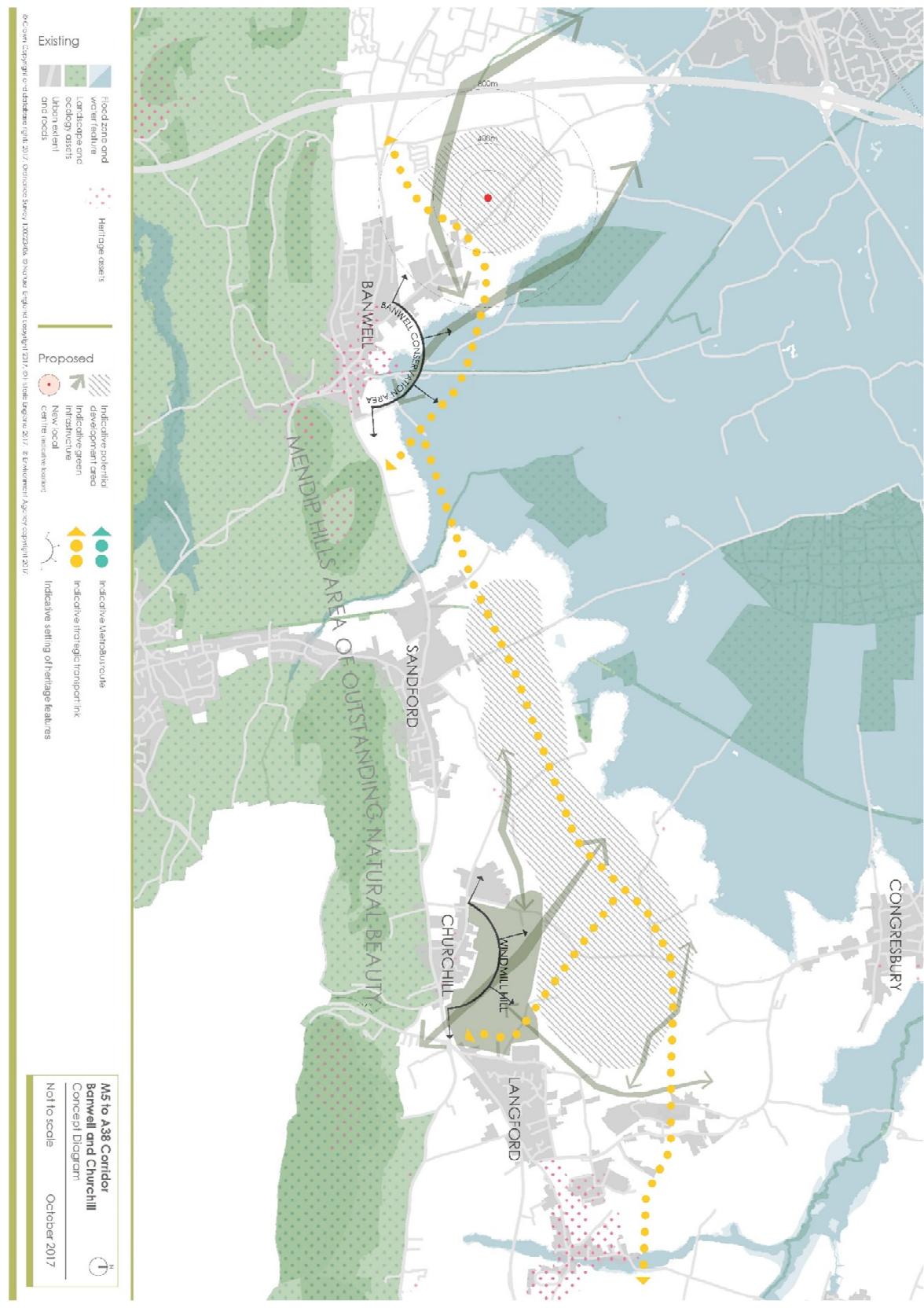
Critical dependencies include provision of suitable ecological/environmental mitigation; delivery of transport/ other infrastructure; and legal/delivery structures in place. May require alternative models of delivery to expedite delivery of transport infrastructure to facilitate residential development.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
<b>Banwell</b>									50	75	150

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
200	200	200	200	200	200	200	150	75	1900

Post 2036	Total Capacity
0	1900

# Appendix 1 –Concept Diagram



Strategic Development Location – Buckover Garden Village.  
South Gloucestershire

Date of Issue: October 2017



## 1.0 Location characteristics

- 1.1 **Site Location (address)**  
Land east and west of A38 at Buckover, near Thornbury
- 1.2 **Size**  
Approx. 160-170ha.
- 1.3 **Relevant planning status and designations**  
None. Some small SSSI, SNCI and Listed Buildings.
- 1.4 **Current land use**  
Agricultural

## 2.0 Suitability (Constraints & Opportunities)

- 2.1 **Strategic Opportunity**  
The JSP Emerging Spatial Strategy (Nov 2016) identified Buckover as accommodating 2,200 dwellings in the plan period (to 2036) and up to 3,000 dwellings in total.
- Opportunity: Buckover provides opportunity to deliver a new 21<sup>st</sup> Century Garden Village in the West of England. It broadens the housing supply model via a single ownership with a genuinely visionary approach to placemaking and land value capture. It could assist the case for a step change in public transport provision in the locality including Metrobus Extension to Thornbury, motorway junction improvements and re-opening of Charfield rail station. It would also provide a key part of long-term solution to housing pressure in the north of the district and potential growth point for the Oldbury New Nuclear Build.
- 2.2 **Site characteristics.**  
The site predominantly comprises agricultural fields and sits in a 'bowl' rising up to woodland at the south of the potential development area.
- 2.3 **Physical & Environmental constraints.**  
Access: From the A38. Local routes and connections back into Thornbury require investigation. M5 J14 is at capacity. The A38, which is a strategic alternative to the M5, bisects the potential development area in two.  
Landscape & Heritage: Wooded ridgeline (inc. SNCI) and archaeological interest along southern boundary. Two Listed Buildings in centre of the site.  
Pylons: run east-west across the site.  
Ecology: Two SSSIs present; the A38 verge and small historic quarry in northeast corner.
- 2.4 **Existing development schemes.**  
No existing development schemes.
- 2.5 **Opportunities**  
Relatively unconstrained land and single ownership with a long-term interest, provides opportunity to develop new exemplar settlement unencumbered by existing development in accordance with Garden Village principles, with full range of new services, facilities and employment opportunities, including heat network and community renewable energy.

## 3.0 Landuses, capacity, availability & viability

- 3.1 Mix of uses – housing, education, employment, retail/centres, and open space.**  
New settlement, including primary school and 3-16 All-through school, local shops, services and POS.
- 3.2 Employment (type/ha)**  
Range of opportunities including office, SME workspaces, logistics, retail & leisure, care home, health & educational facilities, and hotel (11ha in total). Detailed employment provision to be addressed through the local planning process.
- 3.3 Housing typology / density.**  
Garden Village. Broad range of housing types from 1-3 storey to create variety and character within the new settlement and offer to all sections of the community. Average net densities of 30-50dph.
- 3.4 Capacity**  
Approximately 3,000 dwellings and 11ha of employment land (all employment uses).
- 3.5 Availability**  
Single landowner. No known restrictions. Some tenancies.
- 3.6 Viability**  
Considered good, but dependent upon innovative approach to land value and land value capture, i.e. opportunity to explore new model based on long-term return on investment and community governance. See viability evidence for further information.

## 4.0 Concept Diagram

See Appendix 1 – Concept Diagram

## 5.0 Draft policy expectations for location

- 5.1 Vision**  
An exemplar garden village that will be developed along Community Land Trust principles that recycles the uplift in land value into infrastructure, services and facilities and is managed in the long-term interest of the new community.
- 5.2 Housing capacity (types, typology & affordable housing) and other landuses.**  
It will provide around 3,000 dwellings, comprised 35% AH, a full range of types, sizes, new properties for rent, for elderly persons including extra-care facility, custom & self-build and opportunities for SME builders. It will also include a range of employment uses, including 'anchor' business, space for new start-ups, SMEs and live-work community hub, as well as employment to support a new full range of retail and community facilities. Facilities to complement such services available in Thornbury.
- 5.3 Appearance**  
Beautifully and imaginatively designed homes with gardens, of a range of traditional and contemporary styles and character areas that respond to South Gloucestershire's built heritage and local natural environment.
- 5.4 Access**  
Contribution to strategic transport package including: Metrobus Extension to Thornbury (& Buckover), M5 J14 improvements, Charfield Station re-opening, A38(N) Park & Ride,

local bus service improvements and strategic cycle and pedestrian routes. The A38 also acts as important relief road to the M5. Consideration is therefore also required to ensure it can continue to act as an effective relief road without detriment to the new residents. Developer investment required in local highway, foot and cycle connections to Thornbury, including local shuttlebus provision.

#### **5.5 Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)**

A high quality network of strategic planting and open space to reinforce Ridgewood, respect the setting of local heritage and ecology assets, provide for a Sustainable Urban Drainage system and full range of open space including sports pitches, play areas, communal gardens, orchards and allotments. A strategic (open space) gap and or Green Belt between Buckover & Thornbury will be maintained. Its designation and purpose to be confirmed through the SG new Local Plan process.

#### **5.6 Infrastructure requirements (health, education, utilities) etc**

The new settlement will provide a primary school and 3-16 All-through school, nursery, health facility, community hub building, range of employment and office spaces for SMEs and larger businesses, local retail units and hotel. Measures to establish the new community, including BGV residents group and management board, community fund and development worker. Reinforcement of the High Voltage electricity network is likely to be required.

#### **5.7 Energy/heat**

The new settlement will embed zero-carbon and energy positive solutions through the planning, design and delivery process across the whole settlement. Incorporating a range of energy conservation and generation measures, including potential district heat network, renewables, passivhaus standard homes, homeworking measures and electric car charging facilities etc.

### **6.0 Barriers to delivery / critical interventions (Achievability Risks)**

#### **6.1 Identified risks to suitability, availability and achievability.**

The critical risks are:

- Delivery of strategic transportation improvements, including M5 J14 and Metrobus A38 extension, Charfield rail station, and need to maintain strategic capacity on A38.
- Failure to embed Garden Village landownership / land value capture delivery model required to maximise infrastructure provision and community facilities etc early in delivery process.
- Drainage & Utility strategy / costs required, including consideration of risk that pylons pose to capacity and viability.
- Eventual coalescence with Thornbury.

#### **6.2 Actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)**

- Early prioritisation of transportation infrastructure.
- Early engagement around viability modelling and land value capture principles.
- Early embedding of long-term community stewardship principles.
- Early consideration of utility strategy.
- Anchor employment strategy to ensure sustainability of new Garden Village.
- Early consideration and bringing forward of a 'strategic gap' policy, including potential greenbelt extension up the eastern edge of Thornbury.



**7.0 Indicative trajectory**

**7.1** Assumed lead in time of 10 yrs (from 2017), to allow for strategic transportation measures to be funded and programmed. Indicative build out rates: 50-250pa. Relatively slow build out to allow new community to form. Number of developers (outlets): 1-3. School & community facility triggers tbc. Early local bus / shuttlebus improvements & provisions.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
<b>Buckover</b>											

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
50	100	150	150	200	200	200	200	250	1,500

Post 2036	Total Capacity
1,500	3,000



Strategic Development Location – Charfield  
South Gloucestershire

Date of Issue: October 2017



## 1.0 Location characteristics

### 1.1 Site Location (address)

Charfield – comprising a number of major interdependent development areas around the village.

### 1.2 Size

Approximately 60-70ha (gross).

### 1.3 Relevant planning status and designations

Land north of Wotton Road west of the rail line is subject to a current planning application for 121 dwellings and a retail outlet (PT16/6924/O). Refused in July 17. Appeal date TBC.

### 1.4 Current land use

Agricultural

## 2.0 Suitability (Constraints & Opportunities)

### 2.1 Strategic Opportunity

The JSP Emerging Spatial Strategy (Nov. 2016) identified Charfield as accommodating up to a further 1,000 dwellings in the plan period (to 2036). Charfield is located outside the Green Belt, has land reserved for the re-opening of a rail station and benefits from a number of local services and facilities. New housing could strengthen the case for re-opening of the station, additional bus services and new services and facilities. The future role and function of existing retail and community assets and remaining greenfield land parcels within the centre of the village adjoining the Wotton Road should be reviewed to ensure future needs are assessed, so that new and existing facilities make the most efficient use of land and they maximise the sustainability of the expanded village.

Development at Charfield would also provide a key part of long-term solution to housing pressure in the north of the district alongside new housing at Thornbury, Buckover Garden Village.

### 2.2 Site characteristics.

The sites predominantly comprise gently sloping agricultural fields.

### 2.3 Physical & Environmental constraints.

Access: M5 J14 capacity presents significant risk. All the sites are considered accessible, although all require further assessment to establish capacity and mitigation works required. The Wotton Road is busy and is the main road from Wotton-under-Edge to the M5 motorway and therefore requires a comprehensive scheme of improvements and traffic calming.

Listed Buildings & landscape: Land to the west is constrained a steep escarpment and Grade I listed church at Churchend. Land to the east is constrained by flood zone and the Stroud district boundary. Land to the north is of ecological, landscape and heritage interest. Land to the south is of ecological and landscape value. All sites are potentially visible from the Cotswold AoNB.

### 2.4 Existing development schemes.

Charfield currently has planning permission for circa 170 dwellings in addition to recent site completions for 20-30 dwellings. Land north of Wotton Road west of the rail line is

subject to a planning application for 121 dwellings and a retail outlet (PT16/6924/O), which was refused in July 17. Appeal date TBC.

## 2.5 Opportunities

Listed Buildings, the escarpment, Elbury Hill and the river flood zone provide the basis of a permanent and varied green infrastructure and public open space strategy. Substantive, planned development provides opportunity to bring forward additional facilities and comprehensive improvement scheme to the Wotton Road and new and improved foot & cycle connections throughout and around the village.

## 3.0 Landuses, capacity, availability & viability

### 3.1 Mix of uses – housing, education, employment, retail/centres, and open space.

Predominantly residential, with a 1.5FE primary school or replacement of existing school with new 3FE school, new convenience store, improved community facility and new & improved POS.

### 3.2 Employment (type/ha)

Compared to other areas of the West of England, availability of employment land in the Charfield area is limited. Allocations for new residential development should therefore be accompanied by a substantial amount of new employment land.

Detailed employment provision and location to be addressed through the local planning process. Initial scenario to test is for approx. 5ha of employment land to be distributed at appropriate locations within the new development area and at land northwest of Charfield along the B4509 (including the former Leyhill Prison visitors centre and at Elmtree Farm).

Non B Class employment should also be distributed at appropriate locations across the development.

### 3.3 Housing typology / density.

A broad range of housing types, predominantly 2 storey, including a significant proportion of smaller market dwellings (apartments and terraced) to supplement / expand the range, type and tenure of existing housing stock in the locality. Average net densities ranging between 30-50dph.

### 3.4 Capacity

Further technical work has indicated that around of 1,200 dwellings and approximately 5ha of new employment land can be accommodated.

### 3.5 Availability

All sites have been promoted by landowners/agents.

### 3.6 Viability

All sites have landowner / developer interest. Considered good. (See viability evidence for further information).

## 4.0 Concept Diagram

Refer to Appendix 1 – Concept Diagram

## 5.0 Draft policy expectations for location

### 5.1 Vision

Charfield will become a more sustainable settlement. New development will enhance the range of housing available, improve the safety and amenity of the Wotton Road, and provide new services and facilities, employment, public transport and walking & cycling opportunities.

### 5.2 Housing capacity (types, typology & affordable housing) and other landuses.

Growth will provide around 1,200 new dwellings, comprised 35% AH, a full range of types, sizes, new accommodation for elderly persons and custom & self-build opportunities, plus new employment space, and improved community facilities.

### 5.3 Appearance

New dwellings will generally be traditional in appearance respecting Charfield's rural character, but with instances of high quality modern architecture that respond to health & wellbeing and sustainability objectives, to add variety and interest to the village.

### 5.4 Access

Provide or contribute to strategic transport packages including: M5 J14 improvements, Charfield Station re-opening, local bus services and a comprehensive Wotton Road environmental enhancement scheme. Developer investment required in foot and cycle connections through and around the village, including potential for a new Charfield circular public right of way route and enhanced route to the Renishaw site, KLB school and Wotton-under-Edge.

### 5.5 Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)

A Green Infrastructure network will enhance and protect the Little Avon River and its flood zone, setting to Elbury Hill, St James' Church, local SSSI & SNCIs and Listed Buildings. New development will also provide Sustainable Urban Drainage systems and full range of new and or improved open space including sports pitches, play areas and allotments.

### 5.6 Infrastructure requirements (health, education, utilities) etc

The Council will work with landowners, developers and the local community to provide a new or enlarged primary school, new convenience store and improved community facilities, preferably within the centre of the village. Additional employment units will also be provided within the new development areas and along the B4509 adjacent the village settlement boundary. Reinforcement of the existing sewerage network and treatment works is likely to be required.

### 5.7 Energy/heat

New development will aim to be zero carbon by maximising the range of energy conservation and generation measures, e.g. including renewables, passivhaus standard homes, homeworking measures and electric car charging facilities etc.

## 6.0 Barriers to delivery / critical interventions (Achievability Risks)

### 6.1 Identified risks to suitability, availability and achievability.

The critical risks are:

- Un-coordinated piecemeal development that fails to secure necessary improvements to the range of services, facilities and accessibility improvements.
- Delivery of strategic transportation improvements, inc M5 J14 and station re-opening,
- Congestion & safety along Wotton Road

- School capacity (will be full once existing permissions are built out)
- Possible reinforcement to existing sewerage network & treatment works.

## 6.2 Actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)

- Early and thorough community and stakeholder engagement is required to assess land uses & facilities demand & options, particularly in light of the existing planning application and appeal for 120 dwellings on land in the centre of the village, which may be better utilised for other uses.
- Consideration / review of developer contributions strategy.
- Continued vigorous promotion of Charfield Station re-opening and early prioritisation / delivery required of M5 J14 improvements.
- Charfield wide access and movement strategy required, including early consideration of a holistic Wotton Road environmental improvement and traffic calming scheme.
- Early engagement with local school academy and the Parish Council / options assessment required.
- Landownership and legal check (see trajectory below).
- Early engagement with Wessex Water.

## 7.0 Indicative trajectory

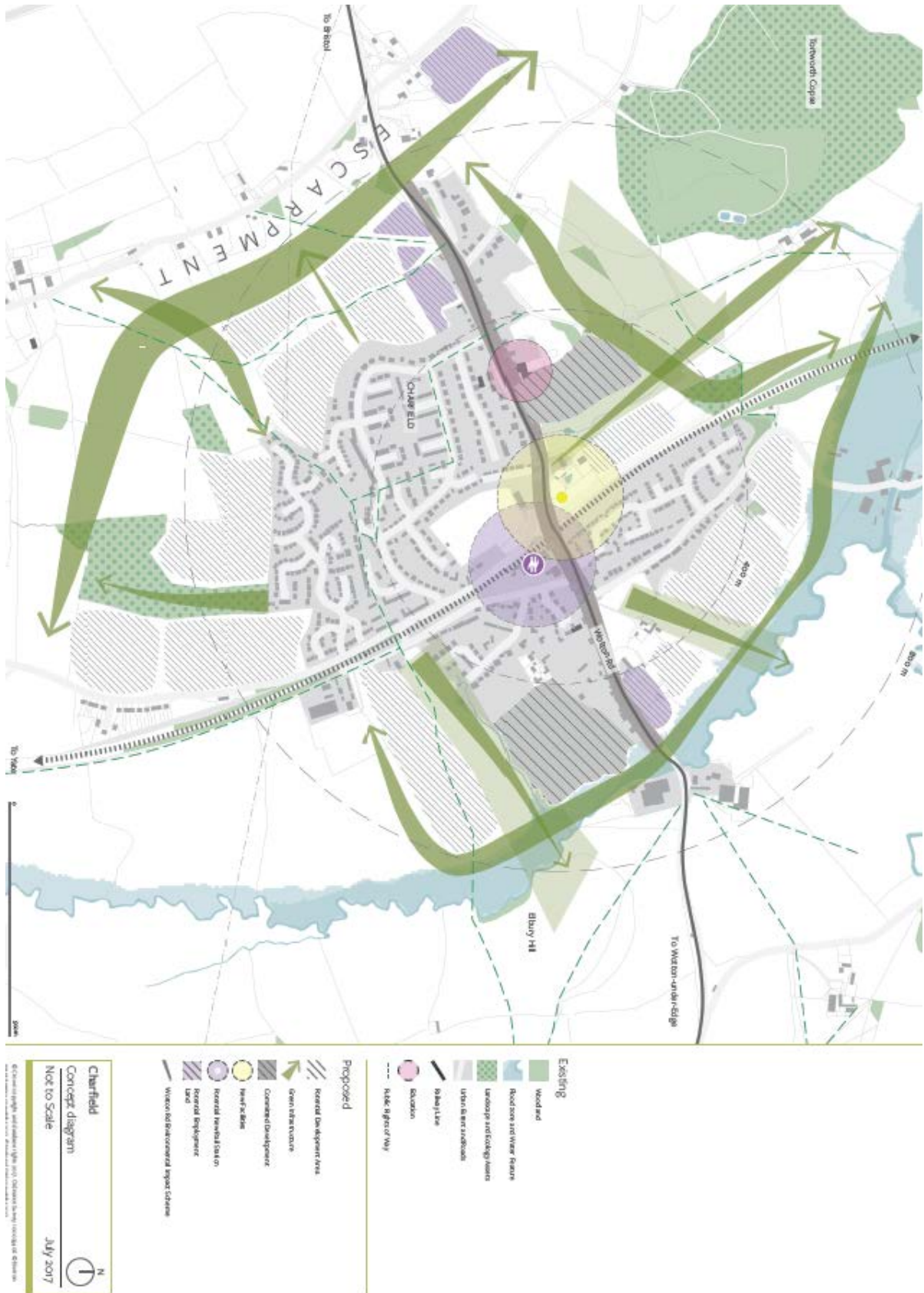
### 7.1 Potential development areas comprise 4 major land holdings.

- The major landholding (comprising 4 landowners) is controlled by Commercial Estates Group around the southwest of the village (circa 650-750 dwellings).
- Bloor homes have made representations relating to land off the Wotton Road NE of the village centre (circa 250 dwellings).
- Barratt currently have a planning application for 121 dwellings on land off the Wotton Road, adjacent the railway in the centre of the village. However, the Council is concerned that this does not represent best use of land, in this central location, ahead of community engagement relating to land-use and service requirements and has refused the application. Appeal date TBC. Use and capacity of this site is thus still tbc.
- Land has also been promoted south of the Crest Nicholson scheme, through which access would be required. Capacity would be restricted by vehicular access requirements (circa 150 dwellings).

A thorough landownership and legal check is required to corroborate the stated positions.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
<b>Charfield</b>							50	50	100	150	150
	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period	
	150	150	150	100	100	50					
	Post 2036						Total Capacity				
	0						1,200				

# Appendix 1 – Concept Diagram





Strategic Development Location – Coalpit Heath  
South Gloucestershire

Date of Issue: October 2017



## 1.0 Location characteristics

- 1.1 **Site Location (address)**  
Land east of Roundways to Frog Lane, Coalpit Heath.
- 1.2 **Size**  
Approx. 75ha
- 1.3 **Relevant planning status and designations**  
No previous planning history. Green Belt.
- 1.4 **Current land use**  
Agricultural

## 2.0 Suitability (Constraints & Opportunities)

- 2.1 **Strategic Opportunity**  
The JSP Emerging Spatial Strategy (Nov 2016) identified Coalpit Heath as accommodating a further 1,500 dwellings in the plan period (to 2036).
- Coalpit Heath offers close proximity to the Science Park and EGE Enterprise Area, and Bristol North Fringe. Strategic development along the A432 Badminton Road, in combination with proposed growth at Yate would support investment in rail and metrobus extension to Yate. It would also support existing and provide new services and facilities and employment opportunities in the locality.
- 2.2 **Site characteristics.**  
The site predominantly comprises agricultural fields and generally rises up to a north-south running ridge along the centre of the site and slopes down to Frog Lane. Some historic earthworks are evident in the fields nearest to Roundways. The historic Dramway runs east west across the southern part of the site.
- 2.3 **Physical & Environmental constraints.**  
Access: From the Badminton Road/Frog Lane, Roundways and Woodside Road. Local junction improvements required.  
Landscape: Ridgeline is highly visible from Yate and the BNF. Consideration required to master planning and architectural response to mitigate impact.  
Historic mine workings: Site was bounded by Frog Lane colliery to north and Ram Hill colliery to the south. Extent and depth of mine workings to be determined. Preliminary investigations suggest that the western edge of the site is at risk from historical shallow coal mining and associated mine entries and to a lesser extent deeper underground workings. Some of the mine entries have been secured whilst some have not. Historic bell pits also appear to be present in the west of the westernmost fields. The mine workings also deepen to the east. Risk of subsidence is considered low. Further more detailed investigations are required, particularly across the western most fields, although remedial measures are considered capable of addressing the mine workings.  
Heritage: Historic Dramway across southern part of site and Listed Building settings to take account of through master planning.
- 2.4 **Existing development schemes.**  
No existing development schemes.

- 2.5 **Opportunities**  
The potential development area provides opportunity to provide a new residential / mixed-use neighbourhood in close proximity to a possible Metrobus extension route. Former mine workings could potentially provide water source for heat networks.

### 3.0 Landuses, capacity, availability & viability

- 3.1 **Mix of uses – housing, education, employment, retail/centres, and open space.**  
Predominantly residential, with 1 or 2 primary schools, new local centre retail to serve the development, community hub/facility, new POS & mining heritage interpretation facility.
- 3.2 **Employment (type/ha)**  
Detailed employment provision and location to be addressed through the local planning process. Initial scenarios to test are for around 5ha of small scale (B-use class) employment units for SME's (e.g. offices, workshops and logistics). Non B-use Class employment (e.g. small scale retail) should also be distributed at appropriate locations across the development.
- 3.3 **Housing typology / density / capacity.**  
A broad range of housing types from 2-4 storey, including a significant proportion of smaller house types (apartments and terraced dwellings) to supplement existing housing stock in the locality. Average net densities ranging between 30-70dph.
- 3.4 **Capacity**  
Further testing / technical work has identified that around 1,800 dwellings and approximately 5ha of employment land can be delivered at this SDL.
- 3.5 **Availability**  
Potential development area has 100% landowner / developer interest, approximately 50:50 Bloor & Edward Ware Homes.
- 3.6 **Viability**  
Considered good, (subject to no significant anomalies identified as consequence of historic mine workings). Refer to viability evidence for further information.

### 4.0 Concept Diagram

Refer to Appendix 1 – Concept Diagram

### 5.0 Draft policy expectations for location

- 5.1 **Vision**  
A comprehensive development scheme delivering a high quality new neighbourhood that responds positively to the localities rich mining heritage and visually prominent aspect.
- 5.2 **Housing capacity (types, typology & affordable housing) and other landuses.**  
A new modern neighbourhood of around 1,800 new dwellings, comprised 35% AH, a full range of types, sizes, new accommodation for elderly persons and custom & self-build opportunities, plus new employment space, and new community facilities.

- 5.3 **Appearance**  
Dwellings will generally be modern in appearance, responding to health, wellbeing and sustainability objectives, providing a fresh new style to the locality, but with instances of high quality traditional architecture that respond to the area's history and site characteristics to add interest and variety.
- 5.4 **Access**  
The development will provide or contribute to a strategic transport package including: Metrobus extension along the Badminton Road to Yate / Chipping Sodbury, Winterbourne & Frampton Cotterell Bypass, A432 Park & Ride west of Yate, Yate Station enhancement, and strategic cycle route and local bus services. Developer investment will also be required in local highway improvements and the local network of foot and cycle connections. Vehicular access will be off the Badminton Road / Frog Lane, Roundways and Woodside Road.
- 5.5 **Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)**  
A Green Infrastructure network will reinforce the new Green Belt boundary along the rail cutting, provide attractive routes through the site to the nearby countryside (including along the historic Dramway), break up development impact along the ridgeline and protect the setting to Listed Buildings. New development will also provide Sustainable Urban Drainage systems and the full range of new open space including sports pitches, play areas and allotments. POS may need to be located on areas worst impacted by historic coal mining.
- 5.6 **Infrastructure requirements (health, education, utilities) etc.**  
A new primary school, new convenience store/retail opportunity, small scale employment units for SMEs, (office space, workshops, logistics), care home and extra-care facility will be provided. Reinforcement of the high voltage electricity network likely to be required. Diversion of or 'plan around' a strategic gas main.
- 5.7 **Energy/heat**  
New development will aim to be zero carbon by maximising the range of energy conservation and generation measures, e.g. including renewables, passivhaus standard homes, homeworking measures and electric car charging facilities etc. A district heating network will also be investigated.

## 6.0 Barriers to delivery / critical interventions (Achievability Risks)

- 6.1 **Identified risks to suitability, availability and achievability.**  
The critical risks are:
- Historic mineworkings. Impact on capacity, abnormal cost of filling, capping and additional foundations.
  - Landowner / developer disagreement & over valuation of land.
- 6.2 **Actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)**
- Independent engineering review of developer land (geophysics and Lidar) surveys.
  - Landownership and legal check.
  - Council pressure to require land equalisation agreement / comprehensive approach and realistic land valuation.

## 7.0 Indicative trajectory

7.1 Potential development areas comprise two major land holdings controlled by Bloors and Edward Ware Homes. 2-3 outlets. Start subject to certainty around programming of strategic transport package.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
<b>Coalpit Heath</b>							50	100	100	150	150

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
150	150	175	150	150	150	150	100	75	1,800

Post 2036	Total Capacity
0	1,800

# Appendix 1 – Concept Diagram



Strategic Development Location – Northwest & West Yate  
South Gloucestershire

Date of Issue: October 2017



Location Map

© Crown Copyright and database rights 2017. Ordnance Survey 100023404.

## 1.0 Location characteristics

### 1.1 Site Location (address)

Land comprising two broad locations to the northwest and west of Yate.

### 1.2 Size

Total area of approximately 160ha (gross).

### 1.3 Relevant planning status and designations

Green Belt (with exception of land at Engine Common).

### 1.4 Current land use

Predominantly agricultural & paddocks.

## 2.0 Suitability (Constraints & Opportunities)

### 2.1 Strategic Opportunity

The JSP Emerging Spatial Strategy (Nov 2016) identified the 'Yate Strategic Corridor' as accommodating a further 2,600 dwellings in the plan period (to 2036).

Yate & Chipping Sodbury is the 4<sup>th</sup> largest settlement in the West of England, with good links including rail to the Bristol Urban Area. Land to the west of Yate has close proximity to major employment areas and the rail station plus is closely related to the proposed Metrobus extension along the Badminton Road.

### 2.2 Site characteristics.

The potential development area is characterised by small historic parliamentary field enclosures at its eastern edge adjacent Engine Common, then predominantly comprises larger agricultural fields and paddocks around the northwestern part of Yate, is generally flat, before sloping down to the Frome south of Nibley Lane. Pylons cross land adjoining the Badminton Road. South of Badminton Road, the northern half of this western edge, is open agricultural fields that slope gently down westwards from the Nibley Lane to a drainage channel and pylon running north – south. The southern part is surrounded by rail lines predominantly on embankments. A pylon crosses from northwest to southeast. Land is mainly used as paddocks and has a neglected feel. Some is filled ground.

### 2.3 Physical & Environmental constraints.

#### 2.4

Access: New highway access points will be required off the Badminton Road (across the Frome valley), Yate Road, Iron Acton Way and possibly Stover Road. A new crossing over the Yate-Thornbury rail track bed *may* be required. South of the Badminton Road new highway access points will be required off the Badminton Road from the north and possibly the industrial estate to the west across the Nibley Lane. A new rail crossing and widening of the Nibley Lane east of the rail line will also be required. Other: Flood plain and pylons run through the centre of the locality and across land off the Westerleigh Road in the south of the potential development area restricting developable area and residential potential.

### 2.5 Existing development schemes.

Site at Engine Common (PK12/1751/F) for 210 dwellings refused in 2013. A planning application (PK17/608/O) for up to 90 dwellings was also refused in July 2017.



## 2.6 Opportunities

Pool Farm and petrol station along the Yate Road could provide the basis of a new local centre to serve the north western development area. Alternatively, it may be more appropriate to locate a new local centre off Stover Road, closer to the rail station. The Frome Valley, rail line and fields to rear of properties along North Road, Engine Common provide the basis of a Green Infrastructure strategy, plus new substantive buffer planting to create a permanent and softened edge to Yate. South of the Badminton Road, development could provide an improved edge and employment development in close proximity to the Badminton Road (new Metrobus extension route and strategic cycle route) and the rail station. Nibley Lane could be downgraded to a green (foot / cycle route). The southern part of the area is compromised by rail lines, pylons and filled ground, hence is not considered suitable for residential use, but could provide new employment land (B2-B8), providing for new and businesses potentially decanted from possible regeneration of the Beeches Estate for higher value, more intensive employment and residential uses in close proximity to the rail station.

## 3.0 Landuses, capacity, availability & viability

### 3.1 Mix of uses – housing, education, employment, retail/centres, and open space.

Predominantly residential to northwest of Yate, with a primary school, new small scale retail / local centre, community hub/facility, new POS. West of Yate possible residential and or employment area.

### 3.2 Employment (type/ha)

Detailed employment provision and location to be addressed through the local planning process. Initial scenarios to test as follows:

- Northwest Yate: Some small-scale employment units for SMEs (e.g. offices, workshops) as part of a high density mixed-use new neighbourhood. Non B Class employment should also be distributed at appropriate locations across the development
- West Yate: Area west of the Badminton Road Trading Estate for 11ha of high quality (B1, B2 uses) extension to the trading estate, remaining area within rail land to the southwest, 19ha B2, B8 use.

### 3.3 Housing typology / density.

Northwest Yate: A broad range of housing types from 2-4 storey, including a significant proportion of smaller house types (apartments and terraced dwellings) to supplement existing housing stock in the locality. Average net densities ranging between 30-70dph.

### 3.4 Capacity

Northwest Yate: The SDL comprises approx. 100-120ha of land which has capacity for a minimum of 2,000 dwellings and supporting facilities and POS.

### 3.5 Availability

Some developer / landowner interest at Engine Common and South of Badminton Road. Landowner interest subject to ongoing investigation on the remainder of the search area.

### 3.6 Viability

Considered satisfactory, subject to significant public sector involvement in land assembly and infrastructure delivery. (Refer to viability evidence for further information).

## 4.0 Concept Diagram

Refer to Appendix 1 – Concept Diagram

## 5.0 Draft policy expectations for location

### 5.1 Vision

Northwest Yate will provide a new high quality, high density, mixed-use residential neighbourhood that connects to a regenerated rail station and Beeches Industrial Estate. It will provide new school(s) and new centre off the Yate or Stover Road, improved connections to the station and green infrastructure throughout the locality. West Yate is favoured for a new strategic employment area (approx. 30ha), comprising high quality office opportunities off the Badminton Road and B2/B8 opportunities within the railway land.

### 5.2 Housing capacity (types, typology & affordable housing) and other landuses.

Northwest Yate has capacity for around 2,000 new dwellings, of which at least 1,000 will be delivered within plan period, comprising a broad range of housing types from 2-4 storey, including a significant proportion of smaller house types (apartments and terraced dwellings) to supplement existing housing stock in the locality and provide a new offer, complemented with high quality community space and public realm, 35% AH, a range of types, sizes, new accommodation for elderly persons and some custom & self-build opportunities, plus new small scale employment space, and new community facilities.

### 5.3 Appearance

Dwellings will generally be modern in appearance, responding to health, wellbeing and sustainability objectives, providing a fresh new style to the locality but with instances of high quality traditional architecture that respond to the area's history and site characteristics to add some interest and variety. The approach should contrast Yate's 'modern' distinctiveness to Chipping Sodbury's more historic character.

### 5.4 Access

The development will provide or contribute to a strategic transport package including: Metrobus extension along the Badminton Road to Yate / Chipping Sodbury, Winterbourne & Frampton Cotterell Bypass, A432 Park & Ride west of Yate, a strategic cycle route, Yate Station enhancement and local bus services. Developer investment will also be required in local highway improvements and the local network of foot and cycle connections. An on-site rail crossing, and a new rail bridge is also likely to be required across the Nibley Lane.

### 5.5 Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)

Green Infrastructure network will reinforce the new Green Belt boundary, protect the river valley, linear settlement of Engine Common and Nibley Village, provide an attractive segregated route along the Frome Valley Walkway, and enhance North Road and Frome river corridor through the Beeches Estate. New development will also provide Sustainable Urban Drainage systems and the full range of new open space including sports pitches, play areas and allotments. The historic parliamentary enclosures, which comprise small to medium sized fields, reinforced by a strong mature hedgerow network and large number of trees, north of Mission Road and east and west of North Road will also need to be protected by a new landscape and or Green Belt designation.

## **5.6 Infrastructure requirements (health, education, utilities) etc**

A new primary school and 3-16 all through school, new convenience store/retail opportunity, small scale employment units for SMEs, (workshops), care home and extra-care facility will need to be provided, plus new employment areas south of the Badminton Road.

## **5.7 Energy/heat**

New development will aim to be zero carbon by maximising the range of energy conservation and generation measures, e.g. including renewables, passivhaus standard homes, homeworking measures and electric car charging facilities etc. A district heating network(s) will also be investigated.

## **6.0 Barriers to delivery / critical interventions (Achievability Risks)**

### **6.1 Identified risks to suitability, availability and achievability.**

The critical risks are:

- Multiple landownerships & potential new rail crossing(s).

### **6.2 Actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)**

- Immediate landownership and legal check. Direct contact of landowners and engagement.
- Early consideration of the role and designation of a Mayoral Development Corporation to enhance the prospect of land assembly, infrastructure delivery and the regeneration of existing industrial areas to bring forward a coherent and well connected new residential development.
- Formulation of Project Plan, comprising:
  - Detailed feasibility (capacity, access & movement, rail crossing) study
  - Employment market assessment.
  - Landownership / delivery model / infrastructure delivery options assessment, inc review of CPO & Devo powers and Council delivery aspirations.
  - Council produced SPD & Outline Planning Application.
  - CPO, infrastructure provision etc
  - Early consideration of extent and purpose of new landscape and or Green Belt designation at Engine Common either side of North Road, north of Mission Road.

**7.0 Indicative trajectory**

7.1 Potential early releases at Engine Common and south of Badminton Road. Otherwise 10yr lead in re majority of residential development at Northwest Yate due to land assembly issues.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
<b>North West Yate</b>							25	25	50	50	50

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
50	50	50	50	50	100	150	150	150	1,000

<b>Post 2036</b>	<b>Total Capacity</b>
1,000	2,000

# Appendix 1 – Concept Diagram



Strategic Development Location – Thornbury  
South Gloucestershire

Date of Issue: October 2017



## 1.0 Location characteristics

### 1.1 Site Location (address)

Land at Thornbury around the town's northern and eastern edge off Butt Lane & Morton Way.

### 1.2 Size

Approx. 35ha (Gross).

### 1.3 Relevant planning status and designations

- Land west of Gloucester Road 130 dwellings (ref PT16/4774/O) approved Aug 17.
- Land at Cleve Park 350 dwellings (ref PT16/3565/O) refused in March 17 – s78 Appeal pending.
- Land at NE Thornbury (south of Gloucester Road) is also subject to a planning application for some 370 dwellings (PT17/2006/O).

### 1.4 Current land use

Agricultural

## 2.0 Suitability (Constraints & Opportunities)

### 2.1 Strategic Opportunity

The JSP Emerging Spatial Strategy (Nov. 2016) identified Thornbury as accommodating up to a further 600 dwellings in the plan period (to 2036).

Opportunity: Development would serve to complete the eastern expansion of the town along Morton Way. Additional housing will assist to address demand in the north of the district and assist the case for Metrobus extension to Thornbury & Buckover GV. Potential to reinforce recreational access and green infrastructure objectives to the east of Thornbury in potential gap to Buckover Garden Village. Additional employment land could assist sustainability objectives.

### 2.2 Site characteristics

Predominantly comprising gently sloping agricultural fields.

### 2.3 Physical & Environmental constraints

Access: Highways England continue to consider mitigation required to increase capacity at M5 J14. Listed Buildings & landscape: Land at Crossways is subject to some flooding. Crossways and Cleve Wood are SNCIs.

### 2.4 Existing development schemes

Thornbury currently has planning permission for circa 625 dwellings at Park Farm & Post Farm. Land west of Gloucester Road has recently been approved for 130 dwellings. Land at Cleve Park was recently refused permission for up to 350 dwellings and a retail/community space and care home, as not in accordance with Core Strategy policy CS32 and the scale and massing of buildings not in keeping with the character of the local area.

### 2.5 Opportunities

Planned development provides opportunity to bring forward additional small scale retail and employment opportunities to serve the eastern side of the town and assists the case for the Metrobus extension and enhance green infrastructure in the locality.

## 3.0 Landuses, capacity, availability & viability

- 3.1 Mix of uses – housing, education, employment, retail/centres, and open space.**  
Predominantly residential, with a new convenience store or community facility, care home & improved POS.
- 3.2 Employment (type/ha)**  
Detailed employment provision and location to be addressed through the local planning process. Initial scenario to test is around 5ha of employment land for SMEs (workshops, logistics) at Crossways.
- 3.3 Housing typology / density.**  
Predominantly traditional design at net densities ranging between 30-50dph, including some self-build homes and accommodation for elderly persons.
- 3.4 Capacity**  
A maximum of 500 dwellings, plus 5ha of employment land at Crossways, from the SDL specified land parcels.
- 3.5 Availability**  
All sites have landowner / developer interest, although for residential development at Crossways.
- 3.6 Viability**  
Considered good. Refer to viability evidence for further information.

## 4.0 Concept Diagram

Refer to Appendix 1 – Concept Diagram

## 5.0 Draft policy expectations for location

- 5.1 Vision**  
Thornbury will provide further high quality housing which will contribute to sustaining the town centre and meet need in the north of the district alongside development at Buckover Garden Village and Charfield. Access to facilities, employment opportunities and open space and countryside will be improved along the Town's eastern edge.
- 5.2 Housing capacity (types, typology & affordable housing) and other landuses.**  
Growth will provide a maximum of 500 new dwellings (over and above existing permissions at Park Farm, Thornbury Fields & Post Farm), comprising 35% AH, a full range of types, sizes, new accommodation for elderly persons and custom & self-build opportunities, plus new employment space and community facilities.
- 5.3 Appearance**  
New dwellings will generally be traditional in appearance respecting Thornbury's market town character, but with instances of high quality modern architecture that respond to health & wellbeing and sustainability objectives, to add variety and interest to the town.
- 5.4 Access**  
The development will contribute towards local and strategic transportation schemes, including potentially: Metrobus Extension to Thornbury (& Buckover), A38(N) Park & Ride, M5 J14 improvements, Charfield Station re-opening, local bus service improvements, local highway, and foot and cycle improvements.



- 5.5 Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)**  
 A Green Infrastructure network will protect Crossways & Cleve Wood, the setting of Hacket Farm, rural nature of Hacket Lane, Clay Lane & Crossways Lane and extend the Pickedbrook Rhine streamside walk. Development will also provide Sustainable Urban Drainage systems and range of new and or improved open space including, play areas and allotments. A Strategic Green (open space) Gap and/or new greenbelt between Thornbury and Buckover Garden Village will be maintained.
- 5.6 Infrastructure requirements (health, education, utilities) etc**  
 CIL contributions towards existing facilities within Thornbury (subject to SGC capital programme decisions).
- 5.7 Energy/heat**  
 New development will aim to maximise the range of energy conservation and generation measures, e.g. including renewables and homeworking measures.

## **6.0 Barriers to delivery / critical interventions (Achievability Risks)**

- 6.1 Identified risks to suitability, availability and achievability.**  
**The critical risks are:**
- None identified. Most of the remainder of the requirement is subject to a current appealed planning application.
- 6.2 Actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)**
- Early community and stakeholder engagement is required to assess options for land at Crossways, which could comprise residential, employment or mixed-use.
  - Preparation of a Community Facilities Audit and close working with Thornbury Neighbourhood Plan Team.
  - Liaison with the LEA to understand emerging education situation.
  - Continued vigorous promotion of Charfield Station re-opening and early prioritisation / delivery required of J14 improvements.
  - Early consideration of extent and purpose of strategic green gap to Buckover. Potential extension to Green Belt in this locality.
  - Early engagement with Buckover GV promoters to assess needs for new school(s).

**7.0 Indicative trajectory**

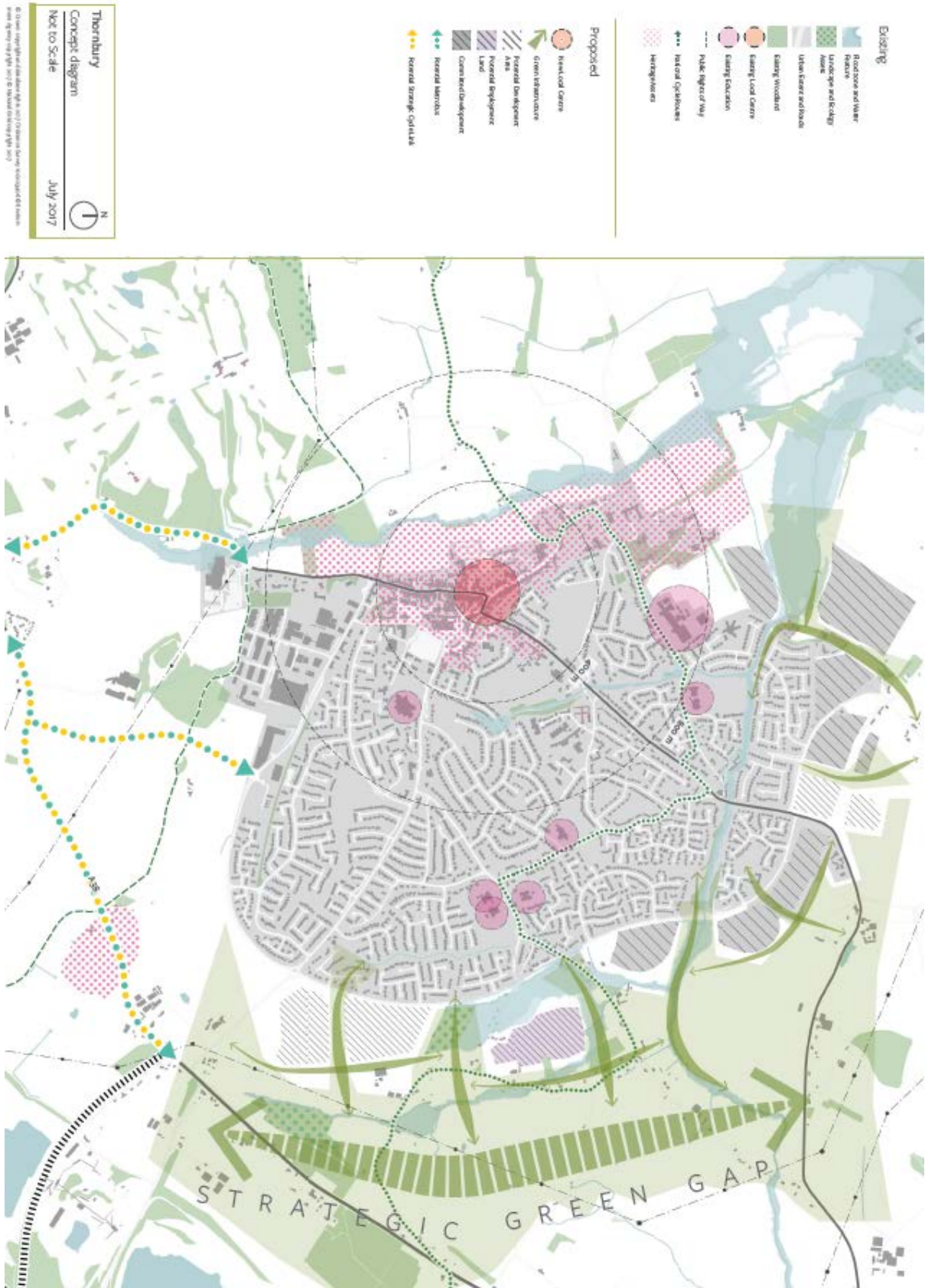
**7.1** 2-3 year lead in for land west of Gloucester Road contribution from other sites anticipated post 2022. 1 outlet per site. 50 dwellings per annum per site. Starts 2019/20, completion by 2030.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
<b>Thornbury</b>				30	50	50	50	50	50	50	50

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
50	50	20							

Post 2036	Total Capacity
0	500

# Appendix 1 – Concept Diagram



# West of England



## West of England Joint Spatial Plan

### Sustainability Appraisal

### Draft SA Report

October 2017

Bath and North East Somerset Council  
Bristol City Council  
North Somerset Council  
South Gloucestershire Council

## Appendix C

### Contents

1. Introduction
2. West of England Joint Spatial Plan
3. Methodology
4. Planning context
5. Baseline information
6. Reasonable alternatives and difficulties encountered
7. Appraisal of effects
8. Monitoring
9. Next steps

### Appendices

- Appendix A Review of relevant plans, programmes and strategies
- Appendix B Baseline data
- Appendix C SA Framework
- Appendix D Appraisal tables
- Appendix E Legal compliance checklist

## Appendix C

### 1. Introduction

What the SEA Regulations states:

#### **Interpretation**

**2.**—(1) *In these Regulations—*

*“plans and programmes” means plans and programmes, including those co-financed by the European Community, as well as any modifications to them, which—*

*(a) are subject to preparation or adoption by an authority at national, regional or local level; or*

*(b) are prepared by an authority for adoption, through a legislative procedure by Parliament or Government; and, in either case,*

*(c) are required by legislative, regulatory or administrative provisions;*

**Environmental assessment for plans and programmes: first formal preparatory act on or after 21<sup>st</sup> July 2004**

**5.**—(1) *Subject to paragraphs (5) and (6) and regulation 7, where—*

*(a) the first formal preparatory act of a plan or programme is on or after 21st July 2004; and (b) the plan or programme is of the description set out in either paragraph (2) or paragraph (3), the responsible authority shall carry out, or secure the carrying out of, an environmental assessment, in accordance with Part 3 of these Regulations, during the preparation of that plan or programme and before its adoption or submission to the legislative procedure.*

*(2) The description is a plan or programme which—*

*(a) is prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, and*

*(b) sets the framework for future development consent of projects listed in Annex I or II to Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment, as amended by Council Directive 97/11/EC.*

*(3) The description is a plan or programme which, in view of the likely effect on sites, has been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive.*

#### **Consultation procedures**

**13.**—(1) *Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying environmental report (“the relevant documents”) shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.*

*(2) As soon as reasonably practicable after the preparation of the relevant documents, the responsible authority shall—*

*(a) send a copy of those documents to each consultation body;*

*(b) take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority’s opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental Assessment of Plans and Programmes Directive (“the public consultees”);*

## Appendix C

*(c) inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, or from which a copy may be obtained; and*

*(d) invite the consultation bodies and the public consultees to express their opinion on the relevant documents, specifying the address to which, and the period within which, opinions must be sent.*

*(3) The period referred to in paragraph (2)(d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.*

### Purpose of the Report

1.1 Sustainability Appraisal (SA) is a structured process for identifying and evaluating the likely significant effects – economic, environmental and social – of implementing a plan. It is a statutory requirement for all emerging Development Plan Documents, incorporating the separate requirements for Strategic Environmental Assessment (SEA).

1.2 The preparation of the West of England Joint Spatial Plan (JSP) has been subject to a fully integrated Sustainability Appraisal and Strategic Environmental Assessment in line with the requirements of:

- the Planning and Compulsory Purchase Act 2004 and National Planning Policy Framework which set out the requirement for SA of emerging Development Plan Documents;
- the SEA Regulations (*Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004*) which require an environmental assessment to be carried out on certain plans and programmes prepared by public authorities that are likely to have a significant effect upon the environment; and
- applicable Government guidance including Planning Practice Guidance.
- The 2005 guidance from the Office of the Deputy Prime Minister, *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents* ('the ODPM guide'), though no longer having formal status, remains a useful source of practical advice.

### Components of the Report

1.3 Work has been undertaken to accompany each stage of JSP production. Chapter 3 identifies all the documents produced. At this stage, to accompany the Publication Version of the JSP, the documents added are this covering report and the appraisal tables for each of the Strategic Development Locations (SDLs). This report is the main output of the SA.

## Appendix C

1.4 The documents produced meet the requirements for an environmental report set out in the SEA Regulations. Appendix X signposts the relevant elements of the SA Report in relation to the contents required.

1.5 This chapter introduces the SA process. The rest of this report is structured as follows:

- Chapter 2 describes the content and main objectives of the JSP;
- Chapter 3 outlines the methodology used in the SA;
- Chapter 4 describes the plan's relationship with other plans, programmes and environmental / sustainability objectives;
- Chapter 5 describes the sustainability baseline;
- Chapter 6 sets out the reasons for selecting the alternatives dealt with and the results of the appraisal of options considered in the development of the draft JSP;
- Chapter 7 sets out the results of the appraisal of the policies within the draft JSP;
- Chapter 8 outlines initial proposals for monitoring the sustainability effects of the options; and
- Chapter 9 describes the next steps.

### How to comment on this Report

1.6 The Draft SA will be published for consultation alongside the Publication Version from 22<sup>nd</sup> November 2017 to 10<sup>th</sup> January 2018. During the consultation period statutory environmental bodies and other interested parties, will have the opportunity to review the draft SA Report. The SA Report will then be finalised for submission along with the plan to the Secretary of State.

1.7 If you have comments, please send these to:

West of England Joint Planning Consultation  
c/o South Gloucestershire Council  
PO Box 299  
Corporate Research and Consultation Team  
Civic Centre, High Street, Kingswood  
Bristol  
BS15 0DR

Email: [comment@jointplanningwofe.org.uk](mailto:comment@jointplanningwofe.org.uk)

### Other assessments undertaken

1.8 The JSP has been subject to a parallel Habitats Regulations Assessment (HRA). The HRA of plans is a requirement of the Habitats Regulations 2010 and relates to the protection of European designated nature conservation sites. European sites are collectively termed Natura 2000 sites and comprise Special Areas



## Appendix C

for Conservation (SACs) and Special Protection Areas (SPAs) together with Ramsar sites. The potential effect of the JSP on these sites will be considered in detailed as part of the assessments carried out under the Habitat Regulations.

1.9 The full HRA report will be published alongside the SA for consultation on the 22nd November 2017.

1.10 An Equalities Impact Assessment has also been produced. The Equality Impact Assessment and SA are two separate processes. The EqIA has been carried out alongside the SA to assess the impact on equality on emerging policies and documents.

## Appendix C

### 2. West of England Joint Spatial Plan

What the SEA Regulations say...

**Information for environmental reports (Schedule 2):**

**1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.**

#### Process

2.1 The Joint Spatial Plan (JSP) is a formal development plan document being prepared by the four West of England (WoE) unitary authorities of Bath and North East Somerset Council, Bristol City Council, North Somerset Council and South Gloucestershire Council. It will cover the period 2016-2036.

2.2 The JSP identifies two Housing Market Areas that operate across the West of England. One focussed on the wider Bristol HMA, which includes Weston-Super-Mare as a sub housing market area, and the other focussed on Bath. The Bath SHMA has been updated to provide consistent information to 2036.

2.3 The Spatial Strategy has been formulated to deliver the Objectively Assessed Need of 97,800 new homes and the Housing Requirement of 102,200 new homes. The SHMA prepared for the West of England evidenced an Objectively Assessed Need (OAN) for housing of 97,800 dwellings for the plan period 2016-2036. This comprises 85,000 dwellings for Wider Bristol Housing Market Area (HMA) & 12,800 dwellings for the Bath HMA. It identifies an overall supply of 105,500 new homes to enable flexibility.

2.4 The JSP will provide the framework to deliver up to 105,500 additional new homes between 2016 and 2036 of which, around 32,200 (30%) should be affordable homes. The housing target supports the planned job growth of 82,500 jobs for the period 2016-2036 (or 125,900 jobs between the period from 2010-2036).

2.5 Once adopted, the JSP will form the strategic framework for Local Plans and Neighbourhood Plans. It is through these that the JSP policies will be put into effect. These plans will make site-specific allocations and include other detail not available at this stage and will, where required, be subject to SA and/or SEA in their own right.

#### Content

2.6 The JSP is a strategic plan, focused on provision to meet identified housing and employment needs over the plan period, through area-wide policies and through the identification of SDLs.

2.7 The plan's objectives – its 'strategic priorities' – are:

## Appendix C

- “...1. To meet in full the identified needs for housing, as far as possible, in a sustainable way. In particular to make a substantial step change in the supply of affordable housing across the plan area.*
- 2. To accommodate the economic growth objectives of the LEP Strategic Economic Plan, particularly growth of existing employment centres such as the Enterprise Zones and Enterprise Areas and economic rebalancing to help address inequality and improve accessibility to jobs.*
- 3. To ensure a spatial strategy where new development is properly aligned with infrastructure and maximises opportunities for sustainable and active travel.*
- 4. Substantially improve the quality and sustainability of new development by;*
- Incorporating a Placemaking approach*
  - Facilitating health, social and cultural well-being*
  - Integrating high quality, multi-functional green infrastructure*
  - Reducing greenhouse gas emissions and ensure resilience to the impacts of climate change.*
- 5. To protect and enhance the sub-region’s diverse and high quality natural, built and historic environment and secure a net gain in biodiversity.*
- 6. To retain the overall function of the Bristol & Bath Green Belt.”*

These plan objectives are important in the development of options to be appraised (see Chapter 6) because ‘reasonable alternatives’ are defined *“taking into account the objectives and the geographical scope of the plan or programme”*.

### 3. Methodology

What the SEA Regulations say...

**Preparation of environmental report:**

**12.**—(1) *Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.*

(2) *The report shall identify, describe and evaluate the likely significant effects on the environment of—*

*(a) implementing the plan or programme; and*

*(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.*

(3) *The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of—*

*(a) current knowledge and methods of assessment;*

*(b) the contents and level of detail in the plan or programme;*

*(c) the stage of the plan or programme in the decision-making process; and*

*(d) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.*

(4) *Information referred to in Schedule 2 may be provided by reference to relevant information obtained at other levels of decision-making or through other Community legislation.*

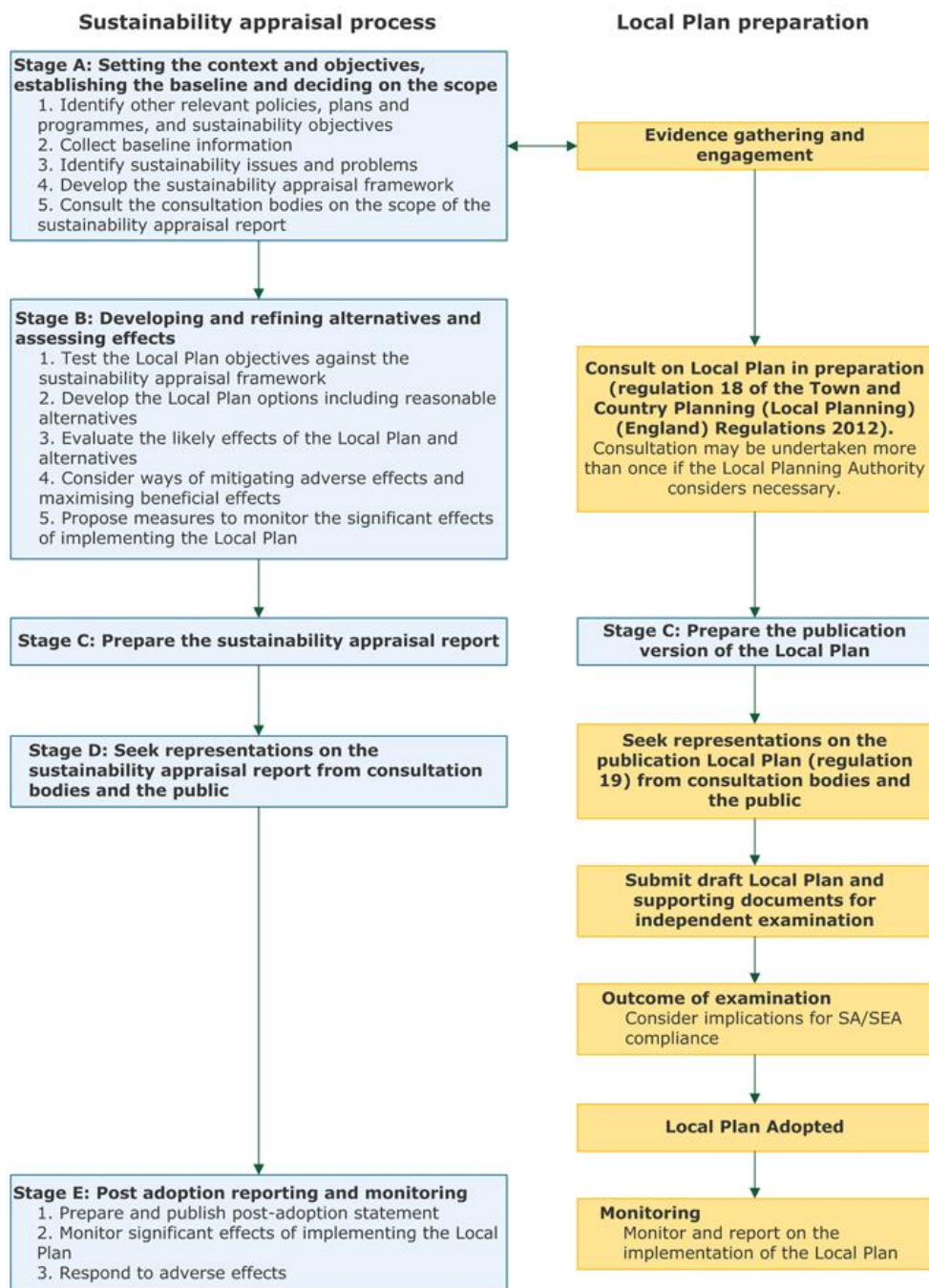
(5) *When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies.*

#### Developing the SA approach

3.1 The methodology for this appraisal was developed in accordance with the ODPM guide as outlined in Table 1 below.

## Appendix C

**Table 1: SA process and Local Plan preparation**



3.2 This chapter outlines the work undertaken on the SA at each stage of plan-making. Previously published SA reports for the Issues and Options (November 2015) and Towards the Emerging Spatial Strategy (November 2016) should be read as component parts of this report. Table 2 below outlines the documents produced at each stage.

## Appendix C

**Table 2:** SA iterations

Iteration and publication date	Stage	Documents	Weblinks
0 – June 2015	A	<ul style="list-style-type: none"> <li>• Draft Scoping Report</li> </ul>	
1 – November 2015	A/B	<ul style="list-style-type: none"> <li>• Revised Scoping Report</li> <li>• Interim SA report: Issues &amp; Options</li> </ul>	<a href="https://www.jointplanningwofe.org.uk/consult.ti/JSPIO2015/view?objectId=274387#274387">https://www.jointplanningwofe.org.uk/consult.ti/JSPIO2015/view?objectId=274387#274387</a>  <a href="https://www.jointplanningwofe.org.uk/consult.ti/JSPIO2015/view?objectId=274387#274387">https://www.jointplanningwofe.org.uk/consult.ti/JSPIO2015/view?objectId=274387#274387</a>
2 – November 2016	A/B	<ul style="list-style-type: none"> <li>• Methodology Paper</li> <li>• Towards an Emerging Spatial Strategy SA</li> </ul>	<a href="https://www.jointplanningwofe.org.uk/consult.ti/JSPEmergingSpatialStrategy/view?objectId=295187#295187">https://www.jointplanningwofe.org.uk/consult.ti/JSPEmergingSpatialStrategy/view?objectId=295187#295187</a>
3 – November 2017	B/C	<ul style="list-style-type: none"> <li>• Draft SA Report</li> </ul>	<a href="https://www.jointplanningwofe.org.uk/consult.ti">https://www.jointplanningwofe.org.uk/consult.ti</a>

3.3 The SA has been developed alongside other workstreams. It does not consider the Green Belt status of potential development locations, nor does it consider in detail whether proposed developments are viable and deliverable. Scoring reflects the assumptions on deliverability and phasing made by the plan itself. However, where further work is needed to confirm these, the scoring and potential for mitigation also reflects this uncertainty.

### Stage A: Scoping

3.4 Stage A has been completed. A SA Scoping Report, to help ensure that the SA process for the JSP covers the key sustainability issues for spatial planning in the West of England, was produced and consulted on from 15th June to 20th July 2015. The ‘consultation bodies’ for the purposes of the SEA Regulations – Historic England, Natural England and the Environment Agency – were consulted. The Scoping Report was revised, responding to the comments received during the consultation, and republished in November 2015.

3.5 The Scoping Report presents the outputs of all the tasks in Stage A (the scoping phase of the SA) and includes baseline information, review of relevant plans and identification of significant sustainability issues for the JSP. From the information collected, an “SA Framework”, or set of sustainability objectives, was developed, against which the various components of the JSP have been appraised.

## Appendix C

The SA framework provides a way in which sustainability effects can be described, analysed and compared. The process of undertaking a SA involves the identification of sustainability objectives which are used to measure and monitor the success of the plan. These can differ from the plan's own objectives; they are designed to document the full range of relevant economic, environmental and social effects rather than to define what the plan aims to achieve. A draft SA Framework was included in the Scoping Report and has been updated following consultation on the Scoping Report. This updated version of the SA Framework has been used to appraise the sustainability of the JSP at each stage of its preparation.

3.6 The starting point for this SA framework are the Scoping Reports prepared for WoE authorities' Development Plans. These were reviewed and amended to ensure their relevance to the scope of the JSP. The policy context and baseline information have since been reviewed to ensure that they remain up-to-date. The revised policy context and a summary of the baseline information are provided as Appendices A and B respectively. Appendix C reproduces the current SA Framework. This includes the 21 objectives against which the plan's policies have been scored.

### Stage B: Assessing Options

3.7 The integration of sustainability into the plan starts formally at the stage of Issues and Options. The effects of the options have been assessed in broad terms with the aim of assisting in the selection of the preferred options. The interim SA report was produced and published and subject to public consultation alongside the JSP Issues and Options document from 9th November 2015 to 29th January 2016.

3.8 Through the process of preparing the draft Plan options were further reviewed due to changes in circumstances such as market change, site availability and changes in national guidance. Therefore, relevant options were reviewed taking into account the objectives of the JSP.

3.9 Therefore, Alternative Options appraisals (as reported in Appendix C) helped to inform the draft Plan. The appraisals of the draft Plan policies are presented in Appendix D.

3.10 Matrices have been used to identify the sustainability effects of the options. These matrices are designed to help identify the potential impacts of the plan on each SA topic (guided by the SA Questions). The matrix for the assessment of the options is a relatively simple matrix. It allows for a discussion and comparison of each of the options under consideration. The simplicity of the matrix is designed to reflect the fact that strategic options should (and in many cases can only be) assessed in broad terms due a lack of spatial expression. A combination of expert judgement and analysis of baseline data has been used to judge the effects of the issues and options.

## Appendix C

3.11 The Sustainability appraisal process relies on expert judgement, which is guided by knowledge of the likely impacts of the plan, the baseline data available and responses and information provided by consultees and other stakeholders. The assessment has been carried out and reported using a matrix enabling an expert, judgement-led qualitative assessment to be made in most cases. The assessment does not seek to identify the likely level of influence of other strategies or policy documents and represents a 'face value' assessment of the likely effects of the JSP proposed policy options.

3.12 A 'precautionary approach' is taken, especially where qualitative judgements and mitigation is suggested if there is any doubt as to the effect of the plan.

### Stage C: Preparing the SA Report

3.13 This document is the main part of the SA Report. It outlines the significant effects on the environment, social and economic factors of the Publication Version and the reasonable alternatives considered as part of the options assessment. It outlines the reasons for selecting the preferred option and the measures envisaged to prevent, reduce and as fully as possible offset any significant effects of implementing the plan.

### Stage D: Consulting on the SA Report

3.14 The draft SA Report has been produced for consultation alongside the Publication Version of the JSP. The consultation period for the draft plan and SA Report is 22nd November 2017 to 10th January 2018. The next stages of the production of the JSP are:

Spring 2018	: Submission to the Secretary of State
Mid 2018	: Examination in Public; and
Late 2018	: Adoption



## Appendix C

### 4. Planning context

What the SEA Regulations state:

**Information for environmental reports (Schedule 2):**

1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.

5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

4.1 As identified in Chapter 3, the purpose of this stage is to document how the plan is affected by outside factors and suggest ideas for addressing any constraints. In order to fulfil the requirements of the SEA Regulations (above), a review has been undertaken of other relevant plans, policies, programmes (PPPs) and objectives.

4.2 Reviews of relevant plans and programmes were presented in the Scoping Report. The review has been updated to take account of publications since the last update of the review undertaken in June 2015 and this is presented in Appendix A.

4.3 Many of the plans, policies and programmes that have been reviewed pick up on some aspect of the “sustainable development” agenda but this may not be their primary purpose. Some of the key “sustainable development” messages coming out of the review of plans, policies and programmes are presented in Table X.

Topic	Sustainable Development Messages
Air quality and noise	<ul style="list-style-type: none"><li>• Improve air quality and reduce air, noise and light pollution;</li></ul>
Biodiversity	<ul style="list-style-type: none"><li>• Protect and enhance biodiversity;</li></ul>
Climate change and flood risk	<ul style="list-style-type: none"><li>• Flood risk is increasing with climate change and there is a need to adapt to all predicted consequences of climate change;</li></ul>
Community, health and well-being	<ul style="list-style-type: none"><li>• Improve peoples’ health and reduce health inequalities;</li><li>• Improve access to health and well-being facilities</li><li>• Protect and provide access to appropriate levels of open space and community facilities;</li><li>• Create mixed, safe communities and promote social inclusion;</li></ul>
Employment	<ul style="list-style-type: none"><li>• Promote high quality and sustainable tourism;</li><li>• Ensure a resilient and economically sustainable food system;</li><li>• Facilitate building competitive economy and improve access to employment and training opportunities</li></ul>

## Appendix C

Energy and carbon emissions	<ul style="list-style-type: none"> <li>• Support low carbon economies;</li> <li>• Achieve successful and competitive businesses both urban and rural;</li> <li>• Promote energy efficiency;</li> <li>• Promote and provide for renewable energy;</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>• Protect and enhance the historic environment;</li> <li>• Promote good design and sustainable construction;</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Meet strategic housing requirements for the district;</li> <li>• Provide affordable housing to meet identified needs;</li> <li>• Promote good design and sustainable construction;</li> <li>• Incorporate the principles of sustainable development;</li> </ul>
Natural resources	<ul style="list-style-type: none"> <li>• Make the best use of previously developed land;</li> <li>• Promote higher densities of development in accessible locations;</li> <li>• Protect soil resources including high quality agricultural land;</li> <li>• Promote water efficiency;</li> <li>• Promote local food production</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• Protect and provide access to appropriate levels of open space;</li> <li>• Protect and enhance landscape settings</li> </ul>
Transport	<ul style="list-style-type: none"> <li>• Reduce the need to travel</li> <li>• Promote a sustainable way of travelling</li> <li>• Encourage walking and cycling and public transport</li> </ul>

## Appendix C

### 5. Baseline information

What the SEA Regulations say...

**Information for environmental reports (Schedule 2):**

**2.** The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.

**3.** The environmental characteristics of areas likely to be significantly affected.

**4.** Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive.

5.1 The comprehensive baseline information which describes the WoE area is presented in the Scoping Report [weblink]. Key baseline data has been updated and presented in Appendix B and Table 3 below provides a summary. In addition, trend information reported in the Scoping Report has been used to identify the “future baseline”, the potential evolution of the baseline in the absence of the plan.

<b>Table 3: Summary of the sustainability baseline data</b>	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<b>Air quality</b>	
<p>Clean air is a basic requirement for health and wellbeing. Road transport is the primary source of urban air pollution. A number of different air-borne particulates are antagonistic to the sensitive lining of airways and act as irritants, causing difficulties and discomfort. The incidence of asthma has been increasing, particularly among children. There is a clear association between long-term exposure to particulate air pollution (PM2.5 and sulphate and sulphur dioxide) and a reduction in life-expectancy caused by cardiovascular disease. The interaction between particulates, nitrogen dioxide and ozone can aggravate these issues.</p> <p><b>Individual AQMAs</b></p> <p><b>Bristol City Council</b> - in the City Centre where nitrogen dioxide (NO2) and fine particles (PM10) are being monitored.</p> <p><b>Bath &amp; North East Somerset Council</b> - in Bath, Keynsham and Saltford.</p> <p><b>South Gloucestershire Council</b> - in the district: Kingswood, Staple Hill and Cribbs Causeway (adjacent to M5 Junction 17). The main air pollutant of concern locally is nitrogen dioxide (NO2), which originates primarily from road traffic emissions.</p>	<p>There are parts of the West of England, particularly the central urbanised areas, where on average over the course of a year air quality is unlikely to achieve national objectives. Nitrogen oxides like nitric oxide (NO) and nitrogen dioxide (NO2) can react in the air to produce ozone and other harmful pollutants that lead to smog. Nitrogen dioxide emissions can also be further oxidised in air to acid gases, which contribute to the production of acid rain.</p> <p>Particulate matter, especially very fine particles, is thought to have a very large impact on human health and is one of the major problems facing environmental professionals. PM10 particles and even smaller fractions (PM2.5) can reach deep into our lungs and can cause severe respiratory problems as well as possibly</p>

## Appendix C

<b>Table 3:</b> Summary of the sustainability baseline data					
<b>Sustainability baseline / issues / characteristics of the area</b>					<b>Suggested evolution without the plan</b>
No AQMA in <b>North Somerset</b> . However the council has a duty to monitor and manage air quality within the District.					<p>contributing to many other conditions and diseases.</p> <p>The WoE Transport Strategy is a major transport programme designed to provide an improved public transport system, relieve traffic congestion and improve emissions.</p>
<b>Noise</b>					
Bristol City Council mapped noise levels from traffic across the city. However there is a gap in the baseline data regarding noise levels in other areas.					Noise problems related to traffic may increase. There is uncertainty over what will happen to neighbourhood noise in the future.
<b>Biodiversity</b>					
	<b>B&amp;NES</b>	<b>Bristol</b>	<b>North Somerset</b>	<b>South Glos</b>	
Wildlife Site of International Importance (Ramsar)		1 (Severn Estuary)	1 (Severn Estuary)	1 (Severn Estuary)	<p>The region's biodiversity is at threat from development; human activities such as pollution, roads, disturbance, farming practices; loss of habitat; loss of food sources and a changing climate.</p> <p>Climate change is likely to disadvantage some species through altering seasons, changing habitats, causing habitat fragmentation (e.g. through drought) and introducing new species which could compete with others for space or could prey on them. However, climate change may also benefit some species for the same reasons.</p>
Special Areas of Conservation (SAC)	2 (Bath & Bradford-on-Avon Bats; North Somerset and Mendip Bats)	2 (Avon Gorge Woodland, Severn Estuary)	4 (Avon Gorge Woodlands, Mendip Limestone Grasslands, North Somerset and Mendip Bats, Severn Estuary)	1 (Severn Estuary)	
Special Protectio	1 (Chew	1 (Severn Estuary)	1 (Severn Estuary)	1 (Severn Estuary)	

## Appendix C

<b>Table 3: Summary of the sustainability baseline data</b>				
<b>Sustainability baseline / issues / characteristics of the area</b>				<b>Suggested evolution without the plan</b>
n Area (SPA)	Valley Lake)			
National Nature Reserves (NNR)			2	
Sites of Special Scientific Interest (SSSIs)	24	5	56, covering c. 3,483 ha of area	22, covering 553 hectares
Local Nature Reserves (LNR)	tbc	8	13, covering 291.424ha	X, covering over 109 ha
Local Geological Sites (LGS)	tbc		77	269 Sites of Nature Conservation Interest (SNCIs)
Local Wildlife Sites	tbc	83	205, covering 8509.39ha	53 Regionally Important Geological / Geomorphological Sites (RIGS)
<b>Climate change and flood risk</b>				
<p>The areas prone to flooding tend to follow the main rivers.</p> <p>The areas most at risk of flooding are:</p> <p><b>Bath</b> - at risk of flooding from rivers, sewers, surface water, artificial sources and to a lesser degree from groundwater (springs). Level 2 SFRA has shown that large proportions of the central area and areas closest to the River Avon are in Flood Zone 3a and 3b (the highest risk). The Black and Veatch Bath Flood Risk Management</p>				

## Appendix C

<b>Table 3:</b> Summary of the sustainability baseline data	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<p>Project Technical Note (February 2012) confirms that the impact of raising the development sites is a loss of conveyance, rather than a loss of flood storage. It recommends, where necessary, to raise all the development sites and the access/egress routes and implement compensatory flow conveyance schemes. Bath Waterside Project is being progressed.</p> <p><b>Keynsham</b> -at risk of flooding from rivers (which may be tidally influenced), surface water, sewers and artificial sources. A level 2 SFRA has shown that a small area to the north of the Somerdale site is in Flood Zone 2. A small area to the South East of the town centre may also be Flood Zone 3a.</p> <p><b>Midsomer Norton</b> -at risk of flooding from rivers, surface water and sewers. A level 2 SFRA has shown that the town centre is in Flood Zone 1. Small areas are at higher risk of flooding. Midsomer Norton benefits from a flood alleviation scheme during a 1% AEP river flood event.</p> <p><b>Radstock</b> - at risk of flooding from rivers, surface water and sewers. A level 2 SFRA has shown that some of the central parts of the town centre are in Flood Zone 2 and 3a.</p> <p>Chew Magna and downstream communities -at risk of flooding from rivers, surface water and artificial sources.</p>	
<b>Community and well being</b>	
<p>In rural areas the level of service deprivation is naturally high due to geographical distance to the services. There is increasing diversity within local communities and identified pockets of deprivation amongst growing levels of affluence across the region.</p> <p>The English Indices of Multiple Deprivation identify the most deprived areas across the country. An updated national dataset is being released in July 2015. This will be utilised within the sustainability appraisal to create a revised baseline understanding of the most deprived Lower Super Output Areas (LSOA) within the WoE. The appraisal will consider whether spatial scenarios are located in or near the most deprived LSOA's and whether specific approaches are included to address deprivation in those areas.</p> <p>Individual Authorities IMD information</p> <p>The following descriptions utilise 2010 IMD data (using the 'Average of LSOA Scores' measure).</p> <p><b>Bristol</b> is ranked 79 out of 326 English authorities. It has 32 LSOAs in the most deprived 10% in England for multiple deprivation (compared to 39 in 2007 and 35 for 2004). Of these 32 LSOAs there are 14 in the most</p>	<p>If not addressed, crime, deprivation and access to services are likely to remain problems.</p> <p>The patterns of deprivation are likely to follow existing trends and will respond to external pressures.</p> <p>Nationally, predicted future trends in population dynamics are: rising household numbers, reflecting increasingly rapid decline in household size, due to ever increasing life expectancy, more households separating and higher inward migration both from other areas of the UK and internationally.</p> <p>Obesity is an increasing issue facing the whole of the country.</p> <p>Without the Plan, the market led development approach may result in inappropriate uses take</p>

## Appendix C

<b>Table 3:</b> Summary of the sustainability baseline data	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<p>deprived 5% and 1 in the most deprived 1%. The number of people living in the most deprived 10% of LSOAs is 60,665 people, which is 14% of all residents living in Bristol.</p> <p><b>In Bristol</b> as a whole 69,500 – 16% of the population – suffer from income deprivation. There are 22 LSOAs where more than a third of all people live in income deprivation. On a ward basis, more than a third of people are income-deprived in Lawrence Hill (36%) and Filwood (35%). The whole of Lawrence Hill ward falls within the most deprived 10% of areas in England with the exception of ‘Redcliffe’.</p> <p><b>Bath and North East Somerset</b> is one of the least deprived authorities in the country, ranking 247 out of 326 English authorities. It is ranked 49 out of 56 unitary authorities. Despite these relatively low levels of deprivation, pockets of high deprivation remain within the area. The following five areas are within the most deprived 20% of the country, Twerton West, Whiteway, Twerton, Fox Hill North and Whiteway West. A research project to understand the issues facing south west Bath is currently underway.</p> <p><b>North Somerset</b> is ranked as 224th out of 326 English authorities. This relative affluence however, hides a number of deprived urban wards. North Somerset has the 7th largest range of inequality of all of the 326 authorities in England. It includes areas within both the most deprived 1% nationally, and the least deprived 1% nationally. 15 of the Lower Level Super Output Areas are within the most deprived 25% of areas nationally, all of these areas being in Weston-Super-Mare.</p> <p><b>South Gloucestershire</b> is ranked as 272nd out of 326 authorities. Compared to many other local authority areas, levels of deprivation in South Gloucestershire are low, but there are sub ward pockets of relatively high deprivation. South Gloucestershire’s most deprived LSOA’s are generally located within the urban wards of Staple Hill, Kings Chase, Patchway, Woodstock and Filton.</p> <p>In terms of the IMD (the composite measure of multiple deprivation), South Gloucestershire only has one LSOA (within Staple Hill) within the most deprived 20% of areas in England. In terms of the Employment Deprivation Domain, South Gloucestershire has two LSOAs (in Staple Hill and Kings Chase) within the most deprived 20% of areas in England.</p>	<p>up the key regeneration sites resulting not meeting to create balance communities.</p>
<b>Economy and employment</b>	
<p>There is an uneven spatial distribution of skills levels in the West of England region.</p>	<p>Without intervention the pattern of skills levels and</p>

## Appendix C

<b>Table 3:</b> Summary of the sustainability baseline data	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<p>Within <b>Bristol</b> the economic planning strategy is set out in Core Strategy BCS8 'Delivering a Thriving Economy'. This sets out that 220000m<sup>2</sup> of additional office space will be provided in the city centre, South Bristol and within designated centres. The policy also protects Primary Industrial and Warehousing (PIWA) areas for existing and future employment use. PIWAs are designated on the proposals map, the Site Allocations and Development Management Policies Plan, contains supporting policy DM18.</p> <p>Bristol also contains an Enterprise Zone, called Bristol Temple Quarter. The planning approach to this area is set out in the Bristol Central Area Plan, policy BCAP 35.</p> <p>The <b>Bath and North East Somerset</b> Core Strategy sets out the economic strategy promoting a net increase of 10,300 jobs. The planning approach for the Enterprise Area in Bath is set out in the Core Strategy, policy B2.</p> <p><b>North Somerset's</b> Core Strategy (Policy CS20) seeks to provide at least 10,100 additional employment opportunities 2006-2026. This is additional to the existing backlog of jobs in relation to past housing growth at Weston-super-Mare. The overall jobs target for North Somerset is therefore about 14,000 jobs.</p> <p><b>South Gloucestershire's</b> Core Strategy seeks to maintain a supply of economic development land in accordance with the Plan's strategy for development set out in Policy CS5. This land is distributed between the North and East Fringe of Bristol urban area, Yate &amp; Chipping Sodbury, Thornbury, the Rural Area and Severnside.</p>	<p>wages within the district is likely to remain the same.</p> <p>The patterns of deprivation are likely to follow existing trends and will respond to external pressures.</p> <p>Unemployment in some wards, again, may remain the same, without intervention to improve skills levels and the diversity of employers in the area.</p>
<b>Historic environment</b>	
<p>Bath was designated a World Heritage site in 1987.</p> <p>There are 37 Conservation Areas, 11 Registered Historic Parks and Gardens, 84 SAMs and approximately 6,400 listed buildings and structures in <b>B&amp;NES</b> (of which 5,000 lie within the City of Bath). There are currently 17 Conservation Areas, 9 Scheduled Monuments, 4 buildings and 1 Designated Park and Garden on the Heritage at Risk Register 2010.</p> <p>The area which was formerly part of the Somerset coalfield retains a rich industrial heritage.</p> <p><b>North Somerset</b> has 36 Conservation Areas, 8 Registered Historic Parks and Gardens, 70 SAMs and 1,072 listed buildings and structures. There are currently 4 Conservation Areas, 2 Scheduled Monuments and 3 listed buildings on the Heritage at Risk Register.</p>	<p>If no development takes place (in the absence of the plan) the value of the designated sites and areas should remain the same. However, climate change may put historic assets at risk due to extreme weather events, flooding, hotter, drier summers and wetter winters.</p>



## Appendix C

<b>Table 3:</b> Summary of the sustainability baseline data	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<p><b>South Gloucestershire</b> has 2074 Listed Building entries of which 2% are Grade I, 6% are Grade II*, and 92% are Grade II, also over 1,470 locally listed buildings, 38 Scheduled monuments, 30 Conservation Areas, 8 registered parks and gardens and 1 battlefield.</p>	
<b>Housing</b>	
<p>High house prices and a lack of affordable housing make it difficult to attract people to the area and to retain key workers.</p> <p>Lower quartile house price in Bath and North East Somerset are more than 9 times the lower quartile resident annual earnings. Nearly half the overall need for affordable housing in B&amp;NES is concentrated in Bath City.</p> <p>Of the households in need, newly forming households unable to afford to buy are the dominant group in Bath &amp; North East Somerset. Achieving an appropriate mix of decent, affordable homes will need to be a priority in any new development proposals.</p> <p>Specific attention needs to be devoted to ensuring energy efficiency, water consumption, and the use of sustainable building materials.</p> <p>In 2011, there are 3,850 HMOs in the district (as defined under planning regulations), the majority of which are located in the City of Bath. There is a strong geographical clustering of HMO in specific parts of the City. The wards of Widcombe, Westmoreland and Oldfield have the highest numbers of HMO with shared facilities, there are estimated to be up to 1,500 properties of this type in these wards alone. To encourage a sustainable community in Bath, by encouraging an appropriately balanced housing mix across Bath, supporting a wide variety of households in all areas, Article 4 Direction was issued to manage the change of use from Family Homes (Use Class C3) to Houses in Multiple Occupation (Use Classes C4 of Sui Generis) across the entire City of Bath.</p>	<p>Without the pro-active planning represented by the Plan, it is unlikely that B&amp;NES will be able to provide enough affordable housing to satisfy future requirements.</p> <p>Without the Plan, the market led development approach may result in inappropriate uses take up the key regeneration sites in Bath resulting not meeting the Council's economic and housing objectives.</p> <p>With the improvements in the Building Regulations the sustainability of new houses is likely to improve.</p>
<b>Land</b>	
<p>B&amp;NES has prepared a Remediation Statement (2002) relating to contaminated land located in Keynsham. This land has been remediated, including the removal of all material, contaminated and uncontaminated, from the site and, therefore, permanently removing the pollutant linkage.</p> <p>No further land is registered as contaminated under Part 2A of the Environmental Protection Act 1990.</p>	<p>As developments occur on contaminated land they will be remediated. Therefore, the amount of contaminated land will decrease over the next 5-10 years.</p> <p>The amount of development that is built on brownfield land should remain high in the district.</p>

## Appendix C

<b>Table 3:</b> Summary of the sustainability baseline data	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<p>82% of now or converted dwellings in the District completed during 2008/09 were built on previously developed land.</p> <p>In the year to April 2016 some 55% of dwelling completions were on previously developed land (PDL). The South Gloucestershire Local Plan sets a target that 50% of all new dwelling completions should be on PDL, since 2004 this target has been exceeded in all except the 2013/2014 monitoring year.</p>	<p>Without the Plan, the market led development approach may result in inappropriate uses take up the key regeneration sites in Bath resulting not meeting efficient use of the brownfield land within the settlement boundaries.</p>
<b>Landscape</b>	
<p>There are 2 AONBs partly within the West of England – Mendip and Cotswolds AONBs.</p> <p>The district has a varied landscape represented by 18 LCAs. Large areas of B&amp;NES are Green Belt (61%).</p> <p>Bath has a distinctive townscape in the way that buildings respond to the distinct topography. Many buildings and terraces follow contours, often overlooking open ground and panoramic views.</p> <p>The character of Keynsham, Norton-Radstock and the villages are enriched and partly defined by the landscapes which surround and in some cases penetrate the built up areas.</p> <p>Large areas of Radstock are covered by a Conservation Area.</p> <p><b>South Gloucestershire</b> has a varied and complex landscape which includes the nationally protected landscapes of the Cotswolds Area of Outstanding Natural Beauty (AONB) and the protected habitats of the Severn Estuary, whilst being an important area for growth and economic development.</p>	<p>Landscape character may be threatened by lack of appropriate management, inappropriate development and climate change.</p> <p>Without the Core Strategy, areas deemed to be of poor townscape character will not be pro-actively improved, leading to a degradation in townscape quality.</p>
<b>Transport</b>	
<p>The current Joint Local Transport Plan (JLTP3) was published in 2011 and sets out the priorities for transport to 2026. In particular, the JLTP3 seeks to achieve a better connected, more balanced and more customer focused transport network. The four West of England authorities, in partnership with the Department for Transport and public transport operators, have invested £80 million to improve key bus corridors as part of the Greater Bristol Bus Network (GBBN) programme which was completed in 2012.</p> <p><b>B&amp;NES</b></p> <p>There is no direct link to the motorway network in B&amp;NES and Bath suffers particularly from the sub-</p>	<p>The high proportion of the district's population recorded in 2001 who travel to work by car will continue unless alternative and more attractive modes of transport are provided.</p> <p>Increased traffic would exacerbate all of the existing problems outlined in the baseline data.</p> <p>The Plan facilitates the implementation of the Transport Strategy. Without the Plan, traffic congestion and air</p>

## Appendix C

<b>Table 3:</b> Summary of the sustainability baseline data	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<p>region's poor internal transport links. The A4 through Keynsham is subject to high levels of congestion. Norton Radstock is connected to Bath by the A367, a popular tourist route to the West Country, and to Bristol via the A362 and A37, the latter also extending south to the A303.</p> <p>Bath is well served by conventional bus services, with good penetration to most parts of the City. These services have difficulty in keeping to timetable due to congestion. High levels of out-commuting from Midsomer Norton and Radstock means that the link road south from Bath to Keynsham, Midsomer Norton and Radstock copes with high levels of commuter traffic.</p> <p><b>North Somerset</b></p> <p>Despite high car ownership levels, North Somerset contains pockets of deprivation with two wards in Weston-super-Mare within the bottom 5% of most deprived wards nationally. This is reflected in car ownership levels with up to 49% having no access to a car in these areas. Accessibility by public transport, walking and cycling to services, facilities and employment in the rural areas is limited. Information for 2010/2011 indicates the following:</p> <ul style="list-style-type: none"> <li>• 54% of households live within 30 minutes travel time by public transport of those health facilities in the Bristol Health Service Plan.</li> <li>• 55% of households live within 40 minutes travel time by public transport from key employment sites.</li> </ul> <p>GBBN investment, together with further investment in other schemes and improvements, has in recent years contributed to increases in bus passenger numbers. The number of passengers boarding services in North Somerset increased by 11% from 2010/11 to 5,286,127 passengers in 2013/14.</p> <p>Cycling trips have also continued to grow with continued investment in new routes and cycling facilities as well as ongoing promotion of cycling in the area. Department for Transport figures show a 52% increase in cycling on North Somerset roads between 2000 and 2013.</p> <p>On a single selected survey day in November 2013, 7,583 rail journeys were made using the five stations in North Somerset. Since 2003, when it stood at 4,507, the number has increased every year.</p>	<p>quality are likely to remain the same or will be worsen.</p>

## Appendix C

<b>Table 3:</b> Summary of the sustainability baseline data	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<p>Bristol Airport is the largest airport serving the South West and South Wales, the ninth largest in the UK and the UK's fifth largest outside London. During 2013, air transport movements increased by 8.8% to 55,640 as a result of the transfer of corporate charter movements from Filton and the growth of scheduled services to Europe. Total aircraft movements increased by 6.7% to 65,299 (compared with 61,206 in 2012 and 66,179 in 2011). Terminal air passengers increased by 3.5%, to a total of 6,125,149. In August 2013, the Airport recorded the busiest month in its history, handling over 700,000 passengers. An estimated 13% of air passengers used public transport for their journey to or from the airport. The number of people working at the airport in summer 2013 was 2,618 (full-time equivalent), up from 2,585 in 2012. Planning permission was granted in February 2011 for a comprehensive expansion of the airport facilities.</p> <p><b>South Gloucestershire</b> has higher than average car ownership and usage. According to the 2011 Census: 86.9% of households have access to at least one car or van, compared to 74.2% nationally.</p> <p>There were 158,289 cars or vans in South Gloucestershire, an average of 1.47 cars or vans per household.</p> <p>In general terms, households without a car tend to be located in parts of the district which are more urban in character, such as Kingswood and Patchway.</p> <p>In 2016, the proportion of people who say they normally cycle to work (13.5%) increased marginally on the 2015 figure (13.3%).</p> <p>In 2015/16 just over 9.4 million journeys were made by bus. This is a 5.8% increase on the previous year and continues the overall trend for increasing bus use in recent years.</p>	
<b>Waste</b>	
<p>B&amp;NES is one of the top recycling authorities within the country, recycling 41% of household waste in 2009/10.</p> <p>Waste infrastructure: 2 x waster transfer stations (Bath and Radstock), 9 x Recycling Collection Points, 3 x Recycling Centres (bulkier items), 1 x railhead, and 2 x refuse collection and cleansing depots.</p> <p>Every day B&amp;NES sends 15 containers by road to Shortwood Landfill Site in South Gloucestershire and Dimmer Landfill Site in Somerset.</p> <p>In 2015/16, 120,590 tonnes* of waste was produced by households in <b>South Gloucestershire</b>, an increase on the</p>	<p>Levels of recycling have been increasing and there is no reason to believe that this trend will change.</p> <p>However, household waste generation may also rise, as a result of new development and population growth and therefore total amounts of residual waste may also increase.</p>

## Appendix C

<b>Table 3: Summary of the sustainability baseline data</b>	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<p>amount produced the previous year. The increase in overall household waste is proportionate to the increase in the number of new households built since 2014/15. In 2015/16, 47.7%* of household waste was recycled compared to 47.5% in the previous year. Although more recycling was collected via the kerbside recycling services, including flats, the overall amount of residual waste (black bin and Sort It Centres) also increased and less recycling was collected at the Sort It Centres compared to 2014/15.</p> <p>Since the start of the contract with SITA (now Suez) in 2000, the total amount of waste sent to landfill is for another year in succession at its lowest point. In 2015/16 only 13% of household waste was sent to landfill compared to around 15% in 2014/15. More material has been diverted from landfill to alternative treatment methods – thermal treatment by Suez, mechanical biological treatment (MBT) and the treatment and recycling of street sweepings. A number of changes are currently being implemented and planned for to further improve recycling rates including future changes to the existing kerbside recycling services and containers in 2017, as well as current changes to the Sort It Centre services to make them more accessible and easier to use e.g. new vehicle registration system and van permit scheme. Some improvements for recycling have already been introduced at the Sort It Centres including providing facilities for residents to separate recycling from bagged waste which is brought to the centres.</p>	
<b>Energy and carbon emissions</b>	
<p>CO<sub>2</sub> emissions from B&amp;NES = 1182 kt annually. Emissions from Domestic sources is 2.7 tonnes per capita (UK average = 2.6 tonnes)</p> <p>There is no record of any major renewable energy schemes within the district. There are a few small scale schemes undertaken on an individual basis but no comprehensive survey of existing installations has been undertaken and this may be a gap in baseline information.</p> <p>A renewable energy research study has been undertaken.</p> <p>Initiatives to improve energy efficiency and utilise renewable energy need to be addressed in relation to the historic buildings.</p> <p>Renewable energy currently generated in <b>South Gloucestershire</b> is equal to 1.5% of projected 2020 energy demand. If all the consented renewable energy schemes are developed, the amount of renewable</p>	<p>With the expected improvements in the Building Regulations, the energy efficiency of new dwellings is likely to improve over the next 5 years.</p> <p>Historic buildings may be difficult to make more energy efficient in light of existing planning controls.</p> <p>On-site renewable energy technologies are developing in response to Part L of the Building Regulations and targets set in other areas of the UK. The percentage of energy generated from renewable sources is likely to increase in the future.</p>

## Appendix C

<b>Table 3:</b> Summary of the sustainability baseline data	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<p>energy being generated will be equal to 4.8% of projected 2020 total energy demand which is more than half of the 7.5% target. An assessment of opportunities to deliver additional renewable and low carbon energy in South Gloucestershire by 2020 is being undertaken, and feasibility studies into the potential for strategic district heat networks are currently underway.</p>	
<b>Water</b>	
<p>Wessex Water has two unused abstraction licences at Newton Meadows and Monkton Combe that may be invested in, in the future. They are implementing sustainable reduction in abstractions in the Malmesbury area and on the Hampshire Avon, outside of this CAMS area but used to supply water into this catchment.</p> <p>During a drought, in the upper reaches of the Bristol Avon flows can be increased by more than 30MI/d using water taken from boreholes.</p> <p>In Somerset some water must be released from reservoirs to compensate for the impact that dams have on flows.</p> <p><b>Chew Valley Lake pumped storage</b></p> <p>The use of Chew Valley Lake for storage of water from the River Avon near Saltford, for use when flows in the river are low in very dry periods</p> <p><u>Low volume appliances in new homes</u></p> <p>Working with developers to provide water efficient appliances in new homes and, where applicable, providing appropriate subsidies</p>	<p>With the expected improvements in the Building Regulations, the water efficiency of new dwellings is likely to improve over the next 5 years.</p>

### 6. Reasonable alternatives and difficulties encountered

What the SEA Regulations state:

**Information for environmental reports (Schedule 2):**

**8.** *An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.*

#### Selecting alternatives

6.1 The ODPM guide and the Planning Practice Guidance state that to meet the requirement to justify the alternatives selected the report should outline:

- the main strategic options considered, how they were identified and the reasons for selecting the options;
- a comparison of the social, environmental and economic effects of the options and how social, environmental and economic issues were considered in choosing the preferred options; and
- other options considered, and why these were rejected.

6.2 The SA iterations mirrored those of the JSP. Iteration 1 (2015) identified a number of typologies – ‘urban intensification’, ‘urban extension’, ‘town expansion’, ‘other settlements / locations’, and ‘dispersed’ – and broad locations associated with each, based on a call for sites and other information on development potential. For Iteration 2 (2016), this range of options was refined, identifying for each of the settlements studied potential directions for expansion. Based on the findings, the options were then divided into those to be taken forward into the preferred strategy and those considered not to be reasonable alternatives beyond this stage. The latter are listed in Table 2 of the document Towards an Emerging Spatial Strategy [weblink], which identifies the reasons why they were filtered out.

6.3 For Iteration 3 (2017), the preferred strategy to be assessed consists of provision that is not specific to a known location and that which is included in the 12 SDLs. The former includes urban intensification and non-strategic growth (up to 500 dwellings). This provision is assessed through SA of the relevant JSP policies. Specific appraisal tables have been produced for each of the SDLs; their relationship to previous work is described in Table 4 below. Iteration 3 was a mix of old and revised locations and took into account the more precise requirements for development set out in the JSP wording.

## Appendix C

**Table 4:** SDLs appraised in 2017

Policy	SDL	Description
7.1	North Keynsham	An expansion of Keynsham is proposed to the north, a location appraised in 2016.
7.2	Whitchurch	An expansion of Whitchurch is proposed to the south east, a location appraised in 2016.
7.3	Land at Bath Road, Brislington	An expansion of Bristol is proposed to the east
7.4	Backwell	An expansion of Backwell is proposed to the west, a location appraised in 2016.
7.5	Banwell Garden Village	Banwell Garden Village is proposed as freestanding development close to the existing village of Banwell. It was not appraised in the 2016 SA, which focused on the existing village.
7.6	Churchill Garden Village	Churchill Garden Village is proposed as freestanding development close to the existing village of Churchill. It was not appraised in the 2016 SA, which focused on the existing village.
7.7	Nailsea	An expansion of Nailsea is proposed to the west. This location was appraised in 2016 but for a less extensive form of development. Previous findings have been reviewed on the basis of the current proposals.
7.8	Buckover Garden Village	Buckover Garden Village provides opportunity to deliver a new Garden Village in the West of England. The site was appraised in the 2016 SA.
7.9	Charfield	An expansion of Charfield is proposed to the North, West, South and East. The site was appraised in the 2016 SA.
7.10	Coalpit Heath	An expansion of Coalpit Heath is proposed to the West. The site was appraised in the 2016 SA.
7.11	Yate	An expansion of Yate is proposed to the North and West. The site was appraised in the 2016 SA.
7.12	Thornbury	An expansion of Thornbury is proposed to the East. The site was appraised in the 2016 SA.

6.4 Each SDL has been assessed as an individual location rather than for its contribution to a strategy. The *Issues and Options* document set out for discussion a number of possible spatial scenarios: protection of the Green Belt, concentration at the Bristol urban area, transport-focused, a more even spread, and a new settlement or limited number of new settlements. Arguments for and against each of these were presented. The spatial scenarios were not subject to SA, which would have required greater certainty about the locations to be included in each scenario. A brief comparison was done of Green Belt versus non-Green Belt locations. SA of alternative strategies becomes increasingly difficult as the number of possible locational combinations increases. It is also somewhat artificial where a preferred



## **Appendix C**

strategy combines elements of several theoretical possibilities in order to respond to a range of local constraints and opportunities.

### **Undertaking the assessment**

6.5 The SA was undertaken internally by officers from the four councils, using readily available information. The core team was not directly involved in the production of the plan itself.

### **Baseline data**

6.6 Some data gaps have been identified within Appendix B. Where there are gaps in the baseline, this has made it difficult to predict the future evolution of the baseline characteristics without the JSP. There is no 'noise map' for the plan area and little other information is available relating to the noise baseline. Tranquillity maps produced by the Campaign to Protect Rural England are available but are now 10 years old. Effects on the noise environment, including exposure to existing noise, have therefore not been assessed.

6.7 Data on agricultural land quality is taken from the provisional Agricultural Land Classification maps, updated by reference to Natural England's ALC Strategic Map, supplemented by detailed surveys where available. Where no detailed survey is known, the SA has identified the potential for agricultural land quality to be of a specified grade. The scale of the ALC maps is such that there is scope for considerable local variation and so detailed survey would be needed for confirmation.

### **Proposal definition**

6.8 The level of detail available for assessment increased through the stages of JSP preparation. This allowed scores to be refined from 'uncertain' to 'positive' or 'negative'. In particular, the policy requirements for each SDL set out in the wording of the Publication Version have allowed more '++' scores, on the basis that the proposal would not normally be permitted to proceed unless this mitigation or enhancement is included. Some uncertainties remain, mainly where viability / deliverability has yet to be tested.

## Appendix C

### 7. Appraisal of effects

What the SEA Regulations say...

**Information for environmental reports (Schedule 2):**

**6.** *The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as—*

*(a) biodiversity;*

*(b) population;*

*(c) human health;*

*(d) fauna;*

*(e) flora;*

*(f) soil;*

*(g) water;*

*(h) air;*

*(i) climatic factors;*

*(j) material assets;*

*(k) cultural heritage, including architectural and archaeological heritage;*

*(l) landscape; and*

*(m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).*

**7.** *The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.*

#### Range of effects

7.1 The time frames used are as follows:

Short term	0-5 years (2016-2021)
Medium term	5-10 years (2021-2026)
Long term	10-20 years (2026-2036)

‘Long-term’ also includes effects extending or arising beyond the plan period. National policy is assumed to endure for the long-term. Some climate change effects will also be long-term.

All effects are assumed to be long-term unless there is evidence to the contrary. At the SDLs, short-term effects are discounted because of the lead-in times required to make a start on development. This does not mean that a start could not be made, only that it is considered unlikely.

7.2 All effects are assumed to be permanent, at least for the lifetime of the development, unless there is evidence that they are temporary.

## Appendix C

7.3 Positive and negative effects have been defined according to the following scale:

0	no discernible effect
-	negative effect capable of mitigation
--	negative effect incapable of mitigation
+/-	mixed effect
+	positive effect capable of enhancement
++	positive effect incapable of enhancement
?	uncertain effect

Where necessary, these scores have been combined, for example '+/?' where the scale of development could result in the effect described but there is some uncertainty over viability / deliverability.

7.4 Secondary, cumulative and synergistic effects have not been identified. Given the limited detail available in a strategic plan such as the JSP, the likelihood of all these types of effect has been treated as uncertain.

7.5 Cumulative effects are likely but difficult to identify. The main cumulative effect is on climate change, where development in principle increases carbon emissions. Infrastructure capacity constraints can also arise as a result of incremental growth in demand but the JSP seeks developer contributions to address these. The JSP plan period overlaps with the adopted Core Strategies of the four councils and so part of the housing requirement will be met through developments that are committed but not yet built. These are therefore additions to the JSP baseline that have not been appraised as part of the JSP, though each Core Strategy was subject to its own SA prior to adoption. The JSP SA has been carried out with the benefit of local knowledge of where these sites are. However, some SDLs are new to large-scale development and in these cases there will be little or no cumulative impact from current housebuilding to be taken into account. The case for new transport infrastructure takes into account the current demand for travel and that generated by all new development over the JSP period, from whatever source. Cumulative effects on biodiversity are in part addressed through the Habitats Regulations Assessment, which looks at cumulative effects on particularly sensitive receptors, including the most important protected habitats. Cumulative effects on flood risk are of concern in some areas and the use of sustainable drainage systems to limit or reduce risk is therefore an important mitigation. Cumulative effects on school rolls are uncertain because reliable projections at primary school level cannot be made more than five years ahead.

7.5 Cumulative and synergistic effects may also arise in conjunction with the plans and programmes of other bodies, outside the planning system. However, work undertaken by, for example, public utilities, is often directed towards meeting needs arising from development and where such bodies are statutory consultees within the planning system there are procedures in place for co-operation.

## Appendix C

7.6 The 21 sustainability objectives used cover the full range of issues from (a) to (l). There are inter-relationships between the various issues studied (issue (m)) and therefore overlap between some of the sustainability objectives used. These should be clear from a reading of the appraisal tables.

### Mitigation

7.7 The final column of each appraisal table sets out any potential to mitigate the negative effects identified. In some cases, this will be through further detail to be made available through Local Plans or planning applications. The SDLs are of such a scale that it is to be expected that they will provide significant new infrastructure to meet the needs arising from development, which could also benefit existing residents and/or their environment.

### Appraisal tables

7.8 The appraisal tables for

- Vision
- Policies
- SDLs (including updated Summary Table at the start)

are set out as Appendix D.

## Appendix C

### 8. Monitoring

What the SEA Regulations say...

**Monitoring of implementation of plans and programmes:**

**17.—(1)** *The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.*

*(2) The responsible authority's monitoring arrangements may comprise or include arrangements established otherwise than for the express purpose of complying with paragraph (1).*

**Information for environmental reports (Schedule 2):**

**9.** *A description of the measures envisaged concerning monitoring in accordance with regulation 17.*

8.1 The monitoring of the JSP will help to:

- monitor the significant effects of the plan;
- track whether the plan has had any unforeseen effects;
- ensure that action can be taken to reduce / offset the significant adverse effects of the plan; and
- provide baseline data for the next SA and to provide a picture of how those factors assessed by the environmental / sustainability criteria are evolving.

8.2 A summary of the proposed approach to monitoring for each objective is in Appendix C, including potential indicators. This will be further developed before submission of the plan. The requirements of the SEA Regulations focus on monitoring the effects of the plan. This equates to both the plan's significant effects and also unforeseen effects. It may be difficult to implement monitoring mechanisms for unexpected effects, or to attribute such effects to the implementation of the JSP when they occur. Due to this difficulty we have suggested a number of more general monitoring indicators which are linked to the SA objectives (contextual indicators, to be appended to DraftSA produced with draft Plan).

8.3 Monitoring forms part of the councils' Annual Monitoring Reports. It will allow them to identify whether the recommended mitigation measures from the SA have been effective and develop further mitigation proposals that may be required where unforeseen adverse effects are identified. In some cases monitoring may identify the need for a policy to be amended or deleted, which could trigger a review of the JSP, or for further policy guidance to be developed (for example a Supplementary Planning Document).

### 9. Next steps

#### **Adoption**

What the SEA Regulations say...

#### **Restriction on adoption or submission of plans, programmes and modifications**

**8.**—(2) A plan or programme for which an environmental assessment is required by any provision of this Part shall not be adopted or submitted to the legislative procedure for the purpose of its adoption before—

- (a) if it is a plan or programme co-financed by the European Community, the environmental assessment has been carried out as mentioned in regulation 7;
- (b) in any other case, the requirements of paragraph (3) below, and such requirements of Part 3 as apply in relation to the plan or programme, have been met.

(3) The requirements of this paragraph are that account shall be taken of—

- (a) the environmental report for the plan or programme;
- (b) opinions expressed in response to the invitation referred to in regulation 13(2)(d);
- (c) opinions expressed in response to action taken by the responsible authority in accordance with regulation 13(4); and
- (d) the outcome of any consultations under regulation 14(4).

#### **Information as to adoption of plan or programme**

**16.**—(1) As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall—

- (a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge; and
- (b) take such steps as it considers appropriate to bring to the attention of the public—

- (i) the title of the plan or programme;
- (ii) the date on which it was adopted;
- (iii) the address (which may include a website) at which a copy of it and of its accompanying environmental report, and of a statement containing the particulars specified in paragraph (4), may be viewed or from which a copy may be obtained;
- (iv) the times at which inspection may be made; and
- (v) that inspection may be made free of charge.

(2) As soon as reasonably practicable after the adoption of a plan or programme—

- (a) the responsible authority shall inform—
  - (i) the consultation bodies;
  - (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and
  - (iii) where the responsible authority is not the Secretary of State, the Secretary of State; and

(b) the Secretary of State shall inform the Member State with which consultations in relation to the plan or programme have taken place under regulation 14(4), of the matters referred to in paragraph (3).

## Appendix C

- (3) The matters are—*
- (a) that the plan or programme has been adopted;*
  - (b) the date on which it was adopted; and*
  - (c) the address (which may include a website) at which a copy of—*
    - (i) the plan or programme, as adopted,*
    - (ii) its accompanying environmental report, and*
    - (iii) a statement containing the particulars specified in paragraph (4), may be viewed, or from which a copy may be obtained.*
- (4) The particulars referred to in paragraphs (1)(b)(iii) and (3)(c)(iii) are —*
- (a) how environmental considerations have been integrated into the plan or programme;*
  - (b) how the environmental report has been taken into account;*
  - (c) how opinions expressed in response to—*
    - (i) the invitation referred to in regulation 13(2)(d);*
    - (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;*
  - (d) how the results of any consultations entered into under regulation 14(4) have been taken into account;*
  - (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and*
  - (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.*

9.1 If any significant issues arise through consultation leading to amendments to the JSP, then further consultation would be required. If the changes made to the JSP are significant, they would also need to be subject to SA.

9.2 Once the plan is adopted, a Sustainability Appraisal (SA) Adoption Statement will need to be published in accordance with SEA Reg. 16(4). This legal requirement relates to environmental considerations but it would be good practice to consider sustainability considerations generally and an Adoption Statement is also a requirement of the Local Plan Regulations (Town and Country Planning (Local Planning) (England) Regulations 2012, Reg. 26).

## Appendix C

### APPENDIX C: SA Framework

The framework used to appraise the JSP has been developed and refined at each stage. The sustainability objectives and linked effect criteria, used to score the locations appraised, were first set out in the Revised SA Scoping Report (November 2015). The Methodology Paper (October 2016) identified a number of adjustments required in the light of experience and set these out in an additional column. For this draft SA Report, a further column has been added to identify potential monitoring requirements. Infrastructure mitigation thresholds mentioned here are indicative only. Actual mitigation would be determined on a case-by-case basis dependent on viability, deliverability and site conditions. The assessment of the Publication Version assumes that specific mitigation required by policy is delivered but not mitigation that is to be investigated, as there is no certainty that these investigations would be successful.

Sustainability Objective / Related SEA Topic	Effect Criteria		Adjustments	Monitoring Approach / Potential Indicators
	Positive Effect (+/++)	Negative Effect (-/--)		
<b>Theme 1:</b> Improve the health, safety and wellbeing of all				
<b>1a. Achieve reasonable access to public open space</b> (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)  <b>SEA Topic</b> Landscape Human Health Population	<ul style="list-style-type: none"> <li>Development in location providing access to suitable (in terms of both quantity and quality) public open space</li> <li>Development on or adjacent primary walking network / public rights of way routes.</li> </ul> <p><b>Reasonable Distance</b></p>	<ul style="list-style-type: none"> <li>Development in location lacking access to suitable (in terms of both quantity and quality) public open space</li> <li>Development on public open space which reduces quantity, quality and accessibility.</li> </ul>	<ul style="list-style-type: none"> <li>Consistency / objectivity unlikely to be achieved at this stage: LPA standards / data availability differ. NSC have included 2km distance from major open spaces.</li> <li>Generally the standards used are:</li> </ul>	Local plans / masterplans should ensure POS standards are met.



Appendix C

	<i>Open Space 400m</i>	<ul style="list-style-type: none"> <li>• Development outside public rights of way network</li> </ul> <p><b>Reasonable Distance</b> <i>Open Space 400m</i></p>	<p>400m from playgrounds, 800 metres from natural spaces, countryside in reasonable walking distance, e.g. via PRowS.</p> <ul style="list-style-type: none"> <li>○ [+] or [-], depending on compliance.</li> <li>○ [++] where range of facilities is exceptionally good, e.g. both major and minor POS, or urban fringe site with direct access to POS plus PRow access to countryside.</li> <li>○ [?] where location already includes POS but it is not known whether this would be retained or replaced by development.</li> </ul>	
<b>1b. Minimise impacts on air quality and locate sensitive development</b>	<ul style="list-style-type: none"> <li>• Sensitive uses (residential, schools, children’s facilities,</li> </ul>	<ul style="list-style-type: none"> <li>• No consideration or inclusion of mitigation</li> </ul>	<ul style="list-style-type: none"> <li>○ [+] no AQMA, not next to motorway.</li> </ul>	Local plans / masterplans should ensure that provision is made.

## Appendix C

<p><b>away from areas of poor air quality</b></p> <p><i>SEA Topic</i> Air Climatic factors Human health Population</p>	<p>food production and distribution) placed outside of AQMA</p> <ul style="list-style-type: none"> <li>• Construction methods / design to reduce and / or eliminate air pollution within new sensitive development</li> <li>• Multiple trees included to assist in reducing poor air quality</li> </ul>	<p>techniques / methods proposed for sensitive development in areas of high air pollution and AQMAs</p> <ul style="list-style-type: none"> <li>• Development which will significantly increase pollution in and around AQMA</li> </ul>	<ul style="list-style-type: none"> <li>○ [+/?] close to AQMA – additional traffic could lead to deteriorating conditions.</li> <li>○ [-] AQMA or next to motorway.</li> <li>○ [--] if no mitigation exists.</li> <li>○ Note need for transport impact assessment as framework for mitigation.</li> <li>○ Note nearby railway line if this may give rise to an air quality issue. Evidence on rail traffic levels may be insufficiently clear to affect the score.</li> </ul>	
<p><b>1c. Achieve reasonable access to healthcare facilities</b> (Doctors, Opticians, Pharmacies, Dentists, Hospitals)</p> <p><i>SEA Topic</i> Material assets</p>	<ul style="list-style-type: none"> <li>• Development generating need for health facilities within reasonable distance.</li> </ul> <p><b>Reasonable distance</b> <i>Hospital 5km</i> <i>GP Surgery 1200m</i></p>	<ul style="list-style-type: none"> <li>• Development generating need for health facilities outside reasonable distance.</li> </ul> <p><b>Reasonable distance</b> <i>Hospital 5km</i> <i>GP Surgery 1200m</i></p>	<ul style="list-style-type: none"> <li>○ [++] location is within the specified distance of all 5 aspects.</li> <li>○ [+] 1-4 aspects.</li> <li>○ Otherwise, [-] or [--], depending on potential for mitigation.</li> </ul>	<p>Local plans / masterplans should ensure that provision is made.</p>

## Appendix C

Population	<i>Dentist 1200m Opticians 800m Pharmacies 800m</i>	<i>Dentist 1200m Opticians 800m Pharmacies 800m</i>	<ul style="list-style-type: none"> <li>○ At least 1,500 homes needed to deliver a small satellite surgery, but trend is towards super surgeries.</li> </ul>	
<b>Theme 2: Support communities that meet people's needs</b>				
<b>2a. Deliver a suitable quantum of high quality housing for the West of England sub-region</b>  <i>SEA Topic</i> Material assets Population	<ul style="list-style-type: none"> <li>● Development that contributes to meeting the needs identified by the wider Bristol SHMA</li> </ul>	<ul style="list-style-type: none"> <li>● Development that does not contribute to meeting the needs identified by the wider Bristol SHMA</li> </ul>	<ul style="list-style-type: none"> <li>○ Generally [++] as all locations deliver housing within one of the relevant HMAs – now including Bath as well as Bristol.</li> <li>○ Exception only where slope angle and on-site restrictions could severely limit development potential, resulting in [0] score.</li> </ul>	Local plans / masterplans should ensure that provision is made.
<b>2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of</b>	<ul style="list-style-type: none"> <li>● Development that contributes to meeting the needs identified by the wider Bristol SHMA</li> </ul>	<ul style="list-style-type: none"> <li>● Development that does not contribute to meeting the needs identified by the wider Bristol SHMA</li> </ul>	<ul style="list-style-type: none"> <li>○ As 2a: housing quantum.</li> <li>○ Note greenfield as more viable and so</li> </ul>	Local plans / masterplans should ensure that provision is made.

Appendix C

<p><b>society within the West of England sub-region</b></p> <p><i>SEA Topic</i> Material assets Population</p>			<p>offering more affordable housing.</p>	
<p><b>2c. Achieve reasonable access to community facilities</b> (post office, meeting venues, youth centres)</p> <p><i>SEA Topic</i> Material assets Human health Population</p>	<ul style="list-style-type: none"> <li>• Development generating need for community facilities within a reasonable distance</li> </ul> <p><b>Reasonable distance</b> <i>Post Offices 600m</i> <i>Meeting Venues 600m</i> <i>Youth Facilities 400m</i></p>	<p><b>Significant negative effect:</b></p> <ul style="list-style-type: none"> <li>• Development generating a need for community facilities, beyond a reasonable distance, with no public transport to community facilities.</li> </ul> <p><b>Negative effect:</b></p> <ul style="list-style-type: none"> <li>• Development generating a need for community facilities, beyond a reasonable distance</li> </ul> <p><b>Reasonable distance</b> <i>Post Offices 600m</i> <i>Meeting Venues 600m</i> <i>Youth Facilities 400m</i></p>	<ul style="list-style-type: none"> <li>○ Consistency / objectivity unlikely to be achieved at this stage: LPA standards / data availability differ.</li> <li>○ [++] location within specified distance of all 3 aspects.</li> <li>○ [+] 1-2 aspects.</li> <li>○ Otherwise, [-] or [--], depending on potential for mitigation.</li> <li>○ Libraries added as equivalent to meeting venues, as they may have potential for evening use.</li> <li>○ Around 1,500 homes needed to deliver a new community meeting space.</li> </ul>	<p>Local plans / masterplans should ensure that provision is made.</p>

Appendix C

<p><b>2d. Achieve reasonable access to educational facilities</b> (primary schools, secondary schools)</p> <p><i>SEA Topic</i> Material assets Population</p>	<ul style="list-style-type: none"> <li>• Development generating a need for education facilities within reasonable distance.</li> <li>• Development which adds to capacity of educational facilities, where known capacity issues exist.</li> </ul> <p><b>Reasonable distance</b> <i>Primary School 800m</i> <i>Secondary School 1500m</i></p>	<p><b>Significant negative effect:</b></p> <ul style="list-style-type: none"> <li>• Development generating a need for educational facilities beyond a reasonable distance, and no public transport access to educational facilities.</li> </ul> <p><b>Negative effect:</b></p> <ul style="list-style-type: none"> <li>• Development in location beyond a reasonable distance to education facilities.</li> <li>• Development which places capacity on educational facilities, where known capacity issues exist.</li> </ul> <p><b>Reasonable distance</b> <i>Primary School 800m</i> <i>Secondary School 1500m</i></p>	<ul style="list-style-type: none"> <li>○ Assessment split into primary and secondary, with separate scores reflected in overall score.</li> <li>○ [++] if mostly within 800m of primary AND mostly within 1500m of secondary.</li> <li>○ [+] if compliant with only one of these.</li> <li>○ [-] if school lacking in the location but potential to provide one. Can combine with positive score as [+/-] if the other type of school is already present.</li> <li>○ [--] if impossible to provide a required school (e.g. scale of new housing may be insufficient to fund). This applies mainly to secondary schools: can combine with score for existing</li> </ul>	<p>Local plans / masterplans should ensure that provision is made.</p>
---	---	--	--	--

			<p>primary school as [+/- -].</p> <ul style="list-style-type: none"> <li>○ Around 5,000 homes needed to deliver a new secondary school</li> <li>○ Around 600 homes for a small primary school.</li> <li>○ Note any potential for strategic mitigation: redrawing of notional catchment areas, etc.</li> <li>○ Capacity issues fall into mitigation, i.e. extra classrooms would be needed and form part of developer costs.</li> <li>○ May need to highlight existing school sites that are too small to accommodate extra classrooms. Scope here for [?] score if unclear.</li> </ul>	
<p><b>2e. Achieve reasonable access to town centre services and facilities</b></p>	<ul style="list-style-type: none"> <li>• Development within reasonable distance of designated city,</li> </ul>	<p><b>Significant negative effect:</b></p> <ul style="list-style-type: none"> <li>• Development beyond reasonable</li> </ul>	<ul style="list-style-type: none"> <li>○ Consistency / objectivity unlikely to be achieved at this stage: LPAs vary in</li> </ul>	<p>Local plans / masterplans should ensure that provision is made. However, some</p>

## Appendix C

<p>(Designated City, Town and District Centres)</p> <p><b>SEA Topic</b> Material assets Population</p>	<p>town or district centre.</p> <ul style="list-style-type: none"> <li>• Development which adds to the retail and leisure services and facilities within a city, town or district centre.</li> <li>• Development which would create a demonstrable increase in footfall and potential use of a centre.</li> <li>• Development with potential to create a critical mass / sense of place which would enable conditions / circumstances to establish a new town / district centre</li> </ul> <p><b>Reasonable distance</b> <i>City centre (plus WsM)</i> 5km <i>(includes access by public transport)</i> Town / District Centre 1500m</p>	<p>distance to designated centres, and no public transport access to town centre services and facilities.</p> <p><b>Negative effect:</b></p> <ul style="list-style-type: none"> <li>• Development beyond a reasonable distance of designated city, town or district centre.</li> </ul> <p><b>Reasonable distance</b> <i>City centre (plus WsM)</i> 5km <i>(includes access by public transport)</i> Town / District Centre 1500m</p>	<p>approach to defining centres.</p> <ul style="list-style-type: none"> <li>○ Villages are likely to score poorly. Note village shop if there is one but score on access to district centre and above.</li> <li>○ [++] if mostly within both distances.</li> <li>○ [+] if mostly within one distance.</li> <li>○ [-] if mostly beyond 5km of city / WsM centre but with reasonable public transport access available. Can be combined with being within 1500m of district centre, as [+/-].</li> <li>○ [--] if mostly beyond both distances and no reasonable public transport available.</li> <li>○ Around 5,000 homes needed to deliver a new district centre.</li> </ul>	<p>development will be remote from district / town centres.</p>
--	--	--	---	---

## Appendix C

<p><b>2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage</b></p> <p><i>SEA Topic</i> Material assets Population</p>	<ul style="list-style-type: none"> <li>• Development that helps to regenerate the areas identified as the most deprived 25% of areas in England</li> <li>• Development that provides good access to employment opportunities for the areas identified as the most deprived 20% of areas in England</li> </ul>	<ul style="list-style-type: none"> <li>• Development that does not help to regenerate the areas identified as the most deprived 25% of areas in England</li> <li>• Development that does not provide good access to employment opportunities for the areas identified as the most deprived 20% of areas in England</li> </ul>	<ul style="list-style-type: none"> <li>○ Where locations adjoin areas of concentrated disadvantage, mitigation column needs to refer to difficulty of making any credible linkage. This may mean that all or most scores are [0] but this is a realistic assessment.</li> </ul>	<p>Local plans / masterplans should ensure that provision is made. However, some development will be remote from these areas.</p>
<p><b>Theme 3: Develop a diverse and thriving economy that meets people's needs</b></p>				
<p><b>3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region</b></p> <p><i>SEA Topic</i> Material assets Population</p>	<ul style="list-style-type: none"> <li>• Development that contributes towards the needs identified by the Economic Development Needs Assessment and the outputs and requirements of the Strategic Economic Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Development that [does not] contribute towards the needs identified by the Economic Development Needs Assessment and the outputs and requirements of the Strategic Economic Plan</li> </ul>	<ul style="list-style-type: none"> <li>○ Emphasis of assessment under 3a should be employment development potential rather than current employment opportunities.</li> <li>○ Most locations suitable for housing will also be suitable</li> </ul>	<p>Local plans / masterplans should ensure that provision is made.</p>



			<p>for some level of employment provision, though commercial attractiveness may be expected to be higher in the larger settlements where economic opportunities of all kinds are wider.</p> <ul style="list-style-type: none"> <li>○ [++] for towns and above (including urban extensions).</li> <li>○ [+] for villages.</li> <li>○ If evidence exists that a location is unsuited to employment, discount to the next lower score.</li> </ul>	
<p><b>3b. Achieve reasonable access to major employment areas</b>  <b>Major Employment sites</b>          Enterprise Zones          Locally designated key employment areas</p> <p><b>SEA Topic</b></p>	<ul style="list-style-type: none"> <li>• Development within reasonable distance of major employment areas</li> </ul> <p><i>Thresholds to be confirmed:          Walking/Cycling distances,</i></p>	<ul style="list-style-type: none"> <li>• Development beyond reasonable distance of major employment areas</li> </ul> <p><i>Thresholds to be confirmed:          Walking/Cycling distances,</i></p>	<ul style="list-style-type: none"> <li>○ Emphasis of assessment under 3b should be current employment opportunities rather than employment development potential.</li> </ul>	<p>Local plans / masterplans should ensure that provision is made.</p>

## Appendix C

<p>Material assets Population Air Climatic factors</p>	<p><i>Served by Public Transport</i></p>	<p><i>Served by Public Transport</i></p>	<ul style="list-style-type: none"> <li>○ Consistency / objectivity unlikely to be achieved at this stage: LPAs vary in approach to defining major employment areas / priority sites. As well as EZ / EA and designated employment areas, could consider significant undesignated complexes such as the port and airport.</li> <li>○ No distance thresholds have been established, either in terms of direct access or by public transport. Future work could consider further possible indicators of proximity, journey length, journey time, and mode of travel.</li> <li>○ At this stage, a [+/-] judgement has to be</li> </ul>	
--	--	--	--	--

## Appendix C

			<ul style="list-style-type: none"> <li>○ made on whether or not good employment opportunities are available in the location assessed.</li> </ul>	
<b>Theme 4: Maintain and improve environmental quality and assets</b>				
<b>4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings</b>  <b>Assets</b> Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Registered Historic Parks and Gardens, Unregistered Historic Parks and Gardens Registered Battlefields, Undesignated local assets (HER) World Heritage Site	<ul style="list-style-type: none"> <li>● Development is likely to safeguard, protect, and where appropriate enhance, the significance of any affected heritage asset, historic townscape or landscape</li> </ul>	<ul style="list-style-type: none"> <li>● Development that leads to loss, change or harm of significance of any affected heritage assets, historic townscape or landscape</li> <li>● Development in locations which would harm the character and setting of an asset</li> </ul>	<ul style="list-style-type: none"> <li>○ [0] if no known heritage constraints.</li> <li>○ [-] if evidence of avoidable harm. Mitigation of avoidable harm includes reducing the area considered for development.</li> <li>○ [--] for registered landscape (i.e. scheduled monument, open space landscape), if this is unavoidable harm, with no way of mitigating negative impact.</li> </ul>	Local plans / masterplans should ensure that provision is made.

## Appendix C

<p>Protected Wreck Site Locally listed structure Town and village greens Local Green Spaces</p> <p><b>SEA Topic</b> Climatic factors Cultural heritage</p>			<ul style="list-style-type: none"> <li>○ [?] for listed buildings. Impact could be positive, neutral or negative and will not be known until design work is progressed.</li> </ul>	
<p><b>4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)</b></p> <p><b>National Sites and assets</b> SSSI National Nature Reserves Local Nature Reserves UK Priority Habitat</p> <p><b>Local Sites</b> SNCI – All authorities Wildlife Corridors – Bristol Ecological Networks</p> <p><b>SEA Topic</b> Biodiversity Fauna Flora Landscape</p>	<ul style="list-style-type: none"> <li>• Development that integrates/preserves or enhances existing local sites habitats or features</li> <li>• Development that maintains/enhances the connectivity and integrity of Wildlife Networks</li> <li>• Development which enhances existing GI corridors and linked assets</li> <li>• Development that takes opportunities to provide new/strengthen existing GI corridors</li> </ul>	<ul style="list-style-type: none"> <li>• Development on or adjacent national and local sites (including Wildlife Corridors) that creates potential for harm</li> <li>• Development that would fragment the Connectivity and Integrity of Wildlife Networks</li> <li>• Development that severs existing GI corridor</li> <li>• Development that leads to loss of individual GI assets on existing corridors in the Strategic Network</li> </ul>	<ul style="list-style-type: none"> <li>○ Similar range to 4a: heritage.</li> <li>○ [0] if no known biodiversity constraints.</li> <li>○ [-] if evidence of avoidable harm. Mitigation of avoidable harm includes reducing the area considered for development.</li> <li>○ [--] where impact on European sites seems likely, if this is unavoidable harm, with no way of mitigating negative impact.</li> <li>○ [?] for most sites – SNCI, etc. Impact</li> </ul>	<p>Local plans / masterplans should ensure that provision is made.</p>

## Appendix C

Material assets Soil			could be positive, neutral or negative and will not be known until design work is progressed. Phase 1 assessments may be needed.	
<p><b>4c. Minimise impact on and where appropriate enhance valued landscapes</b></p> <p><i>National designations</i> AONB</p> <p><i>SEA Topic</i> Biodiversity Climatic factors Cultural heritage Fauna Flora Landscape Soil</p>	<ul style="list-style-type: none"> <li>• Development utilises topography and landform to enhance valued landscape</li> <li>• Development that avoids the impacts on the AONB</li> </ul>	<ul style="list-style-type: none"> <li>• Damage or harm to sensitive areas of the AONB</li> <li>• Overbearing or unsympathetic development in and around key landscape features</li> </ul>	<ul style="list-style-type: none"> <li>○ Note AONB where present but scoring now extended to landscape as a whole, based on initial assessment of sensitivity to strategic level of development: [++] Low [+] Low to medium [0] Medium [-] Medium to high [--] High</li> </ul>	Local plans / masterplans should ensure that provision is made.
<p><b>4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land</b></p>	<ul style="list-style-type: none"> <li>• Development on previously developed land / brownfield sites</li> </ul>	<ul style="list-style-type: none"> <li>• Development on previously undeveloped / open space / greenfield sites</li> </ul>	<ul style="list-style-type: none"> <li>○ [--] in almost all conceivable cases. Opportunities for urban intensification were examined at the Issues &amp; Options</li> </ul>	Local plans / masterplans should ensure that opportunities are taken.

## Appendix C

<p><b>SEA Topic</b> Fauna Flora Landscape Soil</p>			<p>stage; this stage of SA is focused on greenfield alternatives supplementing that potential. Except at Severnside, brownfield land at the locations assessed is likely to be minimal.</p> <ul style="list-style-type: none"> <li>○ Explain score: no scope for mitigation.</li> </ul>	
<p><b>4e. Minimise the loss of productive land, especially best and most versatile agricultural land</b></p> <p><b>SEA Topic</b> Landscape Soil</p>	<p><b>Significant positive effect:</b></p> <ul style="list-style-type: none"> <li>• Safeguarding the protection of high value agricultural land (1 to 3a) which is also outside of flood risk zones 3a and 3b.</li> </ul> <p><b>Positive effect:</b></p> <ul style="list-style-type: none"> <li>• Development on land with no current or immediate potential agricultural value</li> <li>• Provision or enhancement of</li> </ul>	<p><b>Significant negative effect:</b></p> <ul style="list-style-type: none"> <li>• Development on land with agricultural value 1 to 3a, which is also outside of flood risk zones 3a and 3b.</li> </ul> <p><b>Negative effect:</b></p> <ul style="list-style-type: none"> <li>• Loss of local food growing land of demonstrable value</li> </ul>	<ul style="list-style-type: none"> <li>○ Use the provisional ALC data except where superseded by site-specific surveys.</li> <li>○ [--] Grades 1 to 3a, outside FZ3</li> <li>○ [-] Grades 1 to 3a, inside FZ3</li> <li>○ [?] Grade 3 (where 3a/3b split unknown)</li> <li>○ [+] Grades 3b to 5</li> <li>○ [++] Non-agricultural land – but ALC includes under this heading some urban fringe land planned for development in</li> </ul>	<p>Local plans / masterplans should ensure that opportunities are taken.</p>

Appendix C

	local food growing land of demonstrable value		the past that is currently farmed: commentary needs to acknowledge this.	
<p><b>4f. Minimise vulnerability to tidal / fluvial flooding (taking account of climate change), without increasing flood risk elsewhere</b></p> <p><i>SEA Topic</i> Climatic factors Water</p>	<p><b>Significant positive effect:</b></p> <ul style="list-style-type: none"> <li>Highly vulnerable and more vulnerable development in flood zone 1 (as contained in Table 3 of the Flood Risk and Coastal Change PPG).</li> </ul> <p><b>Positive effect:</b></p> <ul style="list-style-type: none"> <li>Development proposed in areas of lowest flood risk (as contained in Table 2 and 3 of the Flood Risk and Coastal Change PPG).</li> <li>Development which mitigates existing flood risk from tidal or fluvial sources</li> </ul>	<p><b>Significant negative effect:</b></p> <ul style="list-style-type: none"> <li>Highly, more and less vulnerable development in flood risk zone 3b (as contained in Table 3 of the Flood Risk and Coastal Change PPG).</li> <li>Highly vulnerable development in flood risk zone 3a</li> </ul> <p><b>Negative effect:</b></p> <ul style="list-style-type: none"> <li>Any other development in areas of flood risk (as contained in Table 3 of the Flood Risk and Coastal Change PPG).</li> <li>Flood defences and mitigation measures would have negative effects on flooding elsewhere</li> </ul>	<ul style="list-style-type: none"> <li>[++] FZ1</li> <li>[+] FZ2</li> <li>[-] FZ3a</li> <li>[--] FZ3b (current locations affected are already sieved-out but significant negative impact could be reintroduced via climate change)</li> <li>[+/-] if substantially mixed</li> <li>Normally no need for [?] as all land has a known FZ status: exceptions can be made where climate change effect is unclear.</li> </ul>	<p>SFRA / site-specific FRA needed to support local plan allocations / masterplans</p>

Appendix C

<p><b>4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere</b></p> <p><i>SEA Topic</i> Climatic factors Water</p>	<ul style="list-style-type: none"> <li>• Development proposed outside of identified high risk surface water areas.</li> <li>• Development which includes measures to reduce run off</li> <li>• Development which mitigates existing surface water flood risk</li> </ul>	<ul style="list-style-type: none"> <li>• Development proposed in identified areas at high risk from surface water flooding</li> <li>• Development which significantly increases run off, increasing the risk of surface water flooding</li> </ul>	<ul style="list-style-type: none"> <li>○ Variety of the locations encountered makes consistent scoring difficult.</li> <li>○ Use EA Updated Flood Map for Surface Water and score directly if possible: [--] 1 in 30 [-] 1 in 100 [+] 1 in 1000 [++] less than 1 in 1000. This data is comprehensive and so avoids the need for a [0] score.</li> <li>○ On most sites with SWF, the area at risk is little more than the width of local watercourses, so will be a mixed score [+/-] unless a wider area is noticeably affected.</li> <li>○ Where a score based on EA categories appears not relevant, because of the</li> </ul>	<p>SFRA / site-specific FRA needed to support local plan allocations / masterplans</p>
--	---	---	--	--



			<p>complexity of SWF risk across the site, an alternative scoring is possible, based on assessment of the extent of the area at risk and potential for mitigation [-], including reduced site area.</p> <ul style="list-style-type: none"> <li>○ SuDS may offer a solution to be noted as possible mitigation.</li> <li>○ Note groundwater (also reservoir) information where known but consistency unlikely to be achievable at this stage as data availability varies between LPAs.</li> </ul>	
<p><b>4h. Minimise harm to, and where possible improve, water quality and availability</b></p> <p><i>SEA Topic</i></p>	<ul style="list-style-type: none"> <li>• Development with potential to improve water quality and/or availability</li> </ul>	<ul style="list-style-type: none"> <li>• Development posing a risk to water quality and/or availability</li> </ul>	<ul style="list-style-type: none"> <li>○ Generally [0], unless an issue exists: examples below.</li> <li>○ [?/-] in Groundwater Source Protection Zone.</li> </ul>	<p>Local plans / masterplans should ensure that provision is made.</p>

## Appendix C

Water			<ul style="list-style-type: none"> <li>○ [?] GSPZ nearby.</li> <li>○ [?] location crossed by major streams, especially if of wildlife interest, as polluted run-off from housing could affect these, even if damage is accidental.</li> </ul>	
<b>Theme 5:</b> Minimise consumption of natural resources				
<p><b>5a. Achieve reasonable access to sustainable transportation</b> (rail station, bus stops, cycle paths, footways)</p> <p><b>SEA Topic</b> Material assets Population Air</p>	<ul style="list-style-type: none"> <li>• Development generating need for travel within reasonable distance of rail station</li> <li>• Development generating need for travel within reasonable distance of bus stops</li> <li>• Development with access to multiple bus routes</li> <li>• Development on or adjacent to the</li> </ul>	<ul style="list-style-type: none"> <li>• Development generating need for travel outside reasonable distance of rail station</li> <li>• Development generating need for travel outside distance to bus stops</li> <li>• Development outside cycling network</li> <li>• Development that reduces connectivity, safety or use of cycling network</li> </ul>	<ul style="list-style-type: none"> <li>○ [+] or [-], depending on compliance. Many locations will be mixed [+/-].</li> <li>○ Note where significant mitigation required.</li> <li>○ 'Reasonable access to sustainable transportation' is mainly about distance to travel facilities but note any capacity constraints that if</li> </ul>	Local plans / masterplans should ensure that provision is made.

Appendix C

	<p>existing cycling and PROW network</p> <ul style="list-style-type: none"> <li>• Extension or enhancement to cycling network to facilitate and encourage sustainable travel</li> </ul> <p><b>Reasonable distance:</b>  <i>Rail Station 800m          Bus Stop 400m          Cycle and Public Rights of Way 400m</i></p>	<p><b>Reasonable distance:</b>  <i>Rail Station 800m          Bus Stop 400m          Cycle and Public Rights of Way 400m</i></p>	<p>severe can reduce score to [--].</p>	
<p><b>5b. Reduce non-renewable energy consumption and ‘greenhouse’ emissions, and provide opportunities to link into existing heat networks</b></p> <p><b>SEA Topic</b>          Air          Climatic factors          Material assets</p>	<ul style="list-style-type: none"> <li>• Development that contributes to reducing non-renewable energy consumption and ‘greenhouse’ emissions</li> <li>• Development that provide opportunities to link into an existing energy network</li> </ul>	<ul style="list-style-type: none"> <li>• Development that does not contribute to reducing non-renewable energy consumption and ‘greenhouse’ emissions</li> <li>• Development that does not provide opportunities to link into an existing energy network</li> </ul>	<ul style="list-style-type: none"> <li>○ Sustainable development teams can advise on heat opportunities.</li> <li>○ Generally [0], as although there is potential for more energy-efficient housing, opportunities will not vary greatly by broad location.</li> <li>○ Note that dispersed development is likely to have some negative effects.</li> </ul>	<p>Local plans / masterplans should ensure that provision is made.</p>

Appendix C

			<p>Where these have been identified under other more specific objectives it would be double-counting to repeat them under this.</p> <ul style="list-style-type: none"><li>○ [?] if urban extension or close to Bristol and potential for heat network cannot be ruled out.</li></ul>	
--	--	--	--	--

## Appendix C

### APPENDIX D: Appraisal tables

Vision and Priorities					
Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	++	++	<p>The proposed Vision states that 'The rich and diverse environmental character will be integral to health and economic prosperity. Patterns of development and transport will facilitate healthy and sustainable lifestyles.</p> <p>Strategic Priority 4 includes improve substantially the quality and sustainability of new development by</p> <ul style="list-style-type: none"> <li>• Incorporating a Placemaking approach</li> <li>• Facilitating health, social and cultural well-being</li> <li>• Integrating high quality, multi-functional green infrastructure</li> </ul>	
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	0/?	0/?	<p>Air quality is not specifically mentioned within the Vision and Priorities however the Vision refers to patterns of development and transport facilitating healthy and sustainable lifestyles. The Priority 4 also refers to health well-being and reducing greenhouse gas emission.</p>	
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	++	++	<p>The Vision refers to existing and new communities will be well integrated, attractive and desirable places and supported by the necessary infrastructure. The Priority 4 also refers substantially improving the quality and sustainability of new development by facilitating health, social and cultural well-being.</p>	

## Appendix C

2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	The Vision refers to the WoE to be one of Europe's fastest growing and most prosperous city regions and provision of a range of housing types will be of high quality and more affordable. Strategic Priority 1 refers to meeting in full the identified needs for housing, as far as possible, in a sustainable way.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	0	++	++	The Vision refers to the WoE to be one of Europe's fastest growing and most prosperous city regions and provision of a range of housing types will be of high quality and more affordable. Strategic Priority 1 refers to meeting in full the identified needs for housing, as far as possible, in a sustainable way. In particular to make a substantial step change in the supply of affordable housing across the plan area.	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	0	++	++	The Vision refers to existing and new communities will be well integrated, attractive and desirable places and supported by the necessary infrastructure  Strategic Priority 3 refers to new development to be properly aligned with infrastructure and maximises opportunities for sustainable and active travel. Strategic Priority 4 refers to improving the quality and sustainability of new development by facilitating health, social and cultural well-being.	
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	0	++	++	The Vision refers to existing and new communities will be well integrated, attractive and desirable places and supported by the necessary infrastructure. Strategic Priority 4 refers to improving the quality and sustainability of new development by facilitating social and cultural well-being.	
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	0	++	++	The access to town Centre services and facilities are no specifically mentioned in the Vision, however Strategy Priority refers to to improving the quality and sustainability of new development by facilitating health, social and cultural well-being.	

## Appendix C

2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	0	++	++	<p>The Vision states that by 2036 the WoE will be one of Europe's fastest growing and most prosperous city regions with the gap between disadvantaged and other communities closed and a rising quality of life for all.</p> <p>Strategic Priority 1 refers to accommodating the economic growth objectives of the LEP Strategic Economic Plan, particularly growth of existing employment centres such as the Enterprise Zones and Enterprise Areas and economic rebalancing to help address inequality and improve accessibility to jobs.</p>	
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region	0	++	++	<p>The Vision states that by 2036 the WoE will be one of Europe's fastest growing and most prosperous city regions with the gap between disadvantaged and other communities closed and a rising quality of life for all.</p> <p>Strategic Priority 1 refers to accommodating the economic growth objectives of the LEP Strategic Economic Plan, particularly growth of existing employment centres such as the Enterprise Zones and Enterprise Areas and economic rebalancing to help address inequality and improve accessibility to jobs.</p>	
3b. Achieve reasonable access to major employment areas	0	++	++	<p>The Vision states that by 2036 the WoE will be one of Europe's fastest growing and most prosperous city regions with the gap between disadvantaged and other communities closed and a rising quality of life for all.</p> <p>Strategic Priority 1 refers to accommodating the economic growth objectives of the LEP Strategic Economic Plan, particularly growth of existing employment centres such as the Enterprise Zones and Enterprise Areas and economic rebalancing to help address inequality and improve accessibility to jobs.</p>	
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	0	++	++	<p>The Vision states that the rich and diverse environmental character will be integral to health and economic prosperity.</p> <p>Strategic Priority 4 refers to protect and enhance the sub-region's diverse and high quality natural, built and historic environment.</p>	

## Appendix C

4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	0	++	++	<p>The Vision states that the rich and diverse environmental character will be integral to health and economic prosperity.</p> <p>Strategic Priority 4 refers to protect and enhance the sub-region's diverse and high quality natural, built and historic environment and secure a net gain in biodiversity.</p>	
4c. Minimise impact on and where appropriate enhance valued landscapes	0	++	++	<p>The Vision states that the rich and diverse environmental character will be integral to health and economic prosperity.</p> <p>Strategic Priority 4 refers to protect and enhance the sub-region's diverse and high quality natural, built and historic environment.</p>	
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	0	?/+	?/+	<p>The Vision does not specifically refer to promoting conservation and wise use of land. However Strategic Priority 4 refers to retaining the overall function of the Bristol and Bath Green Belt which encourage more efficient use of previously developed land.</p>	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	0	?	?	<p>The Vision and priorities don't specifically refer to minimize the loss of productive land.</p>	
4f. Minimise vulnerability to tidal/fluviial flooding (taking account of climate change), without increasing flood risk elsewhere.	0	+	+	<p>The Vision states that new development will be designed to be resilient to, and reduce the impacts of climate change.</p> <p>Strategic Priority 4 refers to ensuring resilience to the impacts of climate change</p>	



## Appendix C

4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	0	+	+	The Vision states that new development will be designed to be resilient to, and reduce the impacts of climate change. Strategic Priority 4 refers to ensuring resilience to the impacts of climate change	
4h. Minimise harm to, and where possible improve, water quality and availability	0	?	?	The Vision and priorities don't specifically refer to minimize the loss of productive land.	
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	0	++	++	The Vision states that patterns of development and transport will facilitate healthy and sustainable lifestyles and existing and new communities will be well integrated, attractive and desirable places and supported by the necessary infrastructure.  Strategic Priority 3 refers to ensuring a spatial strategy where new development is properly aligned with infrastructure and maximises opportunities for sustainable and active travel.	
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	0	+	+	The Vision states that new development will be designed to be resilient to, and reduce the impacts of climate change.  Strategic Priority 4 refers to reducing greenhouse gas emissions and ensure resilience to the impacts of climate change.	

## Appendix C

### POLICIES 1-6

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	+	+	<p>Policy 5; Clause 4 states “<i>ensure the protection and enhancement of the natural, built and historic environment</i>” and Clause 8 is to “<i>maintain and enhance the Green Infrastructure network to deliver multiple benefits for people, place and the environment</i>” to inform new development and delivery of high quality and sustainable places.</p> <p>Non-strategic development will be identified through each authority’s Local Plan process and will need to adhere to local standards addressing open space. Within Policy 5, under Policy Principle 4, the production of a regional Green Infrastructure plan is highlighted as future assessment of the regional environmental assets and will highlight areas in need of protection or enhancement.</p>	<p>Policy 7 indicates where new recreational open space and Green Infrastructure is required as part of individual Strategic Development Locations.</p> <p>Further enhancement opportunities could be delivered through the intended associated Green Infrastructure Plan.</p>

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	-/+	-/+	<p>No specific mention in Policy text.</p> <p>Policy 5; Clause 2 refers to “<i>improve health and wellbeing</i>”; Clause 4 refers to “<i>ensure the protection and enhancement of the natural, built and historic environment</i>”; Clause 5 refers to “<i>mitigate and adapt to climate change</i>”; Clause 6 refers to “<i>minimise energy demand and maximise the use of renewable energy</i>”, Clause 7 refers to “<i>provide and ensure access to infrastructure including public transport, which reduces reliance on use of cars</i>”.</p> <p>Delivery of housing targets would likely result in increased traffic generation and increased trips throughout the region, particularly where strategic growth is proposed. Increasing density of urban areas would have a similar effect in more vulnerable air quality locations. While policy requirements in Policy 5 would have indirect consequences, the issue of air quality impact should be made more explicit in the Plan.</p>	<p>Wording relating to impact on air quality should be included in policy – Potentially Policy 5.</p> <p>Transport Impact Assessments would be required on larger scale development and have been identified in Strategic Development Locations where necessary.</p> <p>Further enhancement opportunities could be delivered through the intended associated Green Infrastructure Plan.</p> <p>Individual Local Plan site allocations should identify problematic areas where non-strategic growth may be impacted and take appropriate action.</p>
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	+	+	<p>Policy 5; Clause 2 refers to reducing health inequalities. Clause 7 refers to provide and ensure access to infrastructure.</p> <p>Policy 6 states “<i>Strategic infrastructure will be required to support the effective implementation of the Joint Spatial Plan Spatial Strategy</i>” and later that “<i>new development must be properly aligned with the provision of the necessary strategic infrastructure</i>”.</p> <p>SDLs, and their relevant Policy, highlight issues relating to the identified areas for strategic growth. Non-strategic growth will be directed by Local Plans and, as expanded on in Policy Principle 7 in Policy 5, development</p>	<p>Policy 6 will be supported by the West of England Joint Infrastructure Delivery Programme.</p> <p>Policy 7 indicates where strategic growth is proposed, key new infrastructure has been identified within the relevant location policy section.</p>

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
				should make provision of community infrastructure necessary to support the new development.	Other, more localised infrastructure will also be required and this will be identified through local plans.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	<p>Policy 1 gives figures relating to the housing need in the region and what will be achieved / delivered during the life of the plan. This includes the identification of suitable strategic growth locations.</p> <p>Policy 5 aims to facilitate all new development to contribute towards the delivery of high quality places.</p> <p>Policy 2; Clause 3 allows non-strategic locations to identified through individual Local Plans.</p> <p>A key objective of the Plan is to provide for the future housing need of the region and supply the necessary amount of homes to each sub-region. The risk of not planning for this adequately would result in development in inappropriate and unsustainable locations.</p>	<p>Policy 2 ensures strategic growth is directed towards the most appropriate locations.</p> <p>Non-strategic growth is to be identified and controlled at Local Plan level.</p>

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	0	++	++	<p>Policy 3; Clause 1 is focused upon the delivery of Affordable Housing in the region and sets out a target number of affordable homes that the plan will deliver.</p> <p>Policy 3; Clause 3 sets the affordable housing requirement for development in the region, giving a minimum target of 35% affordable homes on applications delivering 5 or more dwellings or on sites larger than 0.2ha and broadens the requirement to self-contained C2 developments, including student accommodation.</p> <p>Policy 3; Clause 4 reaffirms that each Strategic Development Location will have a specific affordable housing target.</p> <p>Policy 5 more generally aims to facilitate all new development to contribute towards the delivery of high quality places.</p> <p>A key objective of the plan is to ensure an adequate supply of affordable homes is delivered in conjunction with overall housing targets. Affordable housing will be delivered through individual development and therefore would be subject to individual viability tests.</p>	

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	0	+	+	<p>Policy 5; Clause 2 refers to “<i>reducing health inequalities and facilitate social interaction</i>”. Clause 7 refers to “<i>provide and ensure access to infrastructure</i>”.</p> <p>Policy 2 reinforces the need for delivery of development in Strategic Development Locations to adhere to specific set out policy requirements.</p> <p>Policy 6 states “<i>Strategic infrastructure will be required to support the effective implementation of the Joint Spatial Plan Spatial Strategy</i>” and later that “<i>new development must be properly aligned with the provision of the necessary strategic infrastructure</i>”.</p> <p>SDLs, and their relevant Policy, highlight issues relating to the identified areas for strategic growth. Non-strategic growth will be directed by Local Plans and, as expanded on in Policy Principle 7 in Policy 5, development should make provision of community infrastructure necessary to support the new development.</p>	<p>Policy 6 will be supported by the West of England Joint Infrastructure Delivery Programme.</p> <p>Policy 7 indicates where strategic growth is proposed, key new infrastructure has been identified within the relevant location policy section.</p> <p>Other, more localised infrastructure will also be required and this will be identified through local plans.</p>
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	0	+	+	<p>Policy 2 reinforces the need for delivery of development in Strategic Development Locations to adhere to specific set out policy requirements held in the relevant section of Policy 7.</p> <p>Policy 6 states “<i>Strategic infrastructure will be required to support the effective implementation of the Joint Spatial Plan Spatial Strategy</i>” and later that “<i>new development must be properly aligned with the provision of the necessary strategic infrastructure</i>”.</p> <p>SDLs, and their relevant Policy, highlight issues relating to the identified areas for strategic growth. Non-strategic growth will be directed by Local Plans and, as expanded on in Policy Principle 7 in Policy 5, development should make provision of community infrastructure necessary to support the new development.</p>	<p>Policy 6 will be supported by the West of England Joint Infrastructure Delivery Programme.</p> <p>Policy 7 indicates where strategic growth is proposed, key new infrastructure has been identified within the relevant location policy section.</p> <p>Other, more localised infrastructure will also be required and this will be identified through local plans.</p>

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	0	+	+	<p>Policy 5; Clause 7 creates a requirement to “<i>provide and ensure access to infrastructure</i>”.</p> <p>Policy 2 reinforces the need for delivery of development in Strategic Development Locations to adhere to specific set out policy requirements.</p> <p>Policy 6 states “<i>Strategic infrastructure will be required to support the effective implementation of the Joint Spatial Plan Spatial Strategy</i>” and later that “<i>new development must be properly aligned with the provision of the necessary strategic infrastructure</i>”.</p> <p>SDLs, and their relevant Policy, highlight issues relating to the identified areas for strategic growth. Non-strategic growth will be directed by Local Plans and, as expanded on in Policy Principle 7 in Policy 5, development should make provision of community infrastructure necessary to support the new development.</p>	<p>Policy 6 will be supported by the West of England Joint Infrastructure Delivery Programme.</p> <p>Policy 7 indicates where strategic growth is proposed, key new infrastructure has been identified within the relevant location policy section.</p> <p>Other, more localised infrastructure will also be required and this will be identified through local plans.</p>
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	0	0	0/+	<p>Policy 4 identifies the need to provide better access to employment in South Bristol.</p> <p>Policy 5; Clause 2 refers to “<i>reducing health inequalities and facilitate social interaction</i>”. Clause 7 refers to “<i>provide and ensure access to infrastructure</i>”.</p>	
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region.	0	++	++	<p>Policy 4 set out the region’s requirements for employment and identifies key strategic employment locations. The delivery and protection of employment in these locations will be set out in individual Local Plans.</p> <p>In relation to Strategic Development Locations, Policy 4 states “<i>The amount of employment land provided for at the SDLs will respond to the amount of residential development proposed... will be secured through allocation and policy detail in Local Plans</i>”.</p>	

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
3b. Achieve reasonable access to major employment areas	0	+	+	<p>Policy 4 prioritises the growth of existing centres and explicitly identifies areas - South Bristol, Bath and Weston-super-Mare – as areas where improved accessibility is required.</p> <p>Where additional growth is identified, the policy reaffirms the overall strategic aim to provide new supporting transport infrastructure.</p> <p>Policy 5; refers to “<i>enable inclusive and sustainable economic growth</i>”; while Clause 7 creates a requirement to “<i>provide and ensure access to infrastructure</i>”.</p> <p>Policy 2 reinforces the need for delivery of development in Strategic Development Locations to adhere to specific set out policy requirements.</p> <p>Policy 6 states “<i>Strategic infrastructure will be required to support the effective implementation of the Joint Spatial Plan Spatial Strategy</i>” and later that “<i>new development must be properly aligned with the provision of the necessary strategic infrastructure</i>”.</p>	Where strategic growth is proposed, key new infrastructure has been identified within the relevant policy. Other more localised infrastructure will also be required and this will be identified through local plans.
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	0	+/?	+/?	<p>Policy 5; Clause 4 requires “<i>the protection and enhancement of the natural, built and historic environment</i>”.</p> <p>The Plan gives firm direction to the protection of historic assets. Detail of the historic environment will be pursued through individual Local Plans and through mechanisms such as Conservation Appraisals. Development will be assessed against the impact on heritage asserts on a case by case basis.</p>	Further enhancement opportunities could be delivered through the intended associated Green Infrastructure Plan.
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	0	+/?	+/?	<p>Within Policy 5, policy requirement for all new development follows the set clauses - Clause 4 requires the “<i>protection and enhancement of the natural, built and historic environment</i>”; Clause 5 refers to “<i>mitigate and adapt to climate change and use a catchment based approach to water management</i>”; Clause 6 to “<i>Minimise energy demand and maximise the use of renewable energy</i>” and; ‘Clause 8 refers to “<i>maintain and enhance the Green Infrastructure network to deliver multiple benefits for people, place and the environment</i>”.</p>	Further enhancement opportunities could be delivered through the intended associated Green Infrastructure Plan.



## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
4c. Minimise impact on and where appropriate enhance valued landscapes	0	+/?	+/?	<p>Within Policy 5, policy requirement for all new development follows the set clauses - Clause 1 refers to “<i>create character, distinctiveness and sense of place</i>”. Clause 4 refers to “<i>ensure the protection and enhancement of the natural, built and historic environment</i>”. Clause 8 refers to “<i>maintain and enhance the Green Infrastructure network to deliver multiple benefits for people, place and the environment</i>”.</p> <p>The Plan encourages the protection of valuable landscapes. Detail on important areas or local issues will be identified through the Local Plans of each authority and development will be assessed on a case by case basis.</p>	Further enhancement opportunities could be delivered through the intended associated Green Infrastructure Plan.
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	0	+/-	+/-	<p>Policy 2; Clause 2 directs the delivery of housing and employment land to maximise “<i>the sustainable development of previously developed land and other appropriate opportunities within existing urban areas</i>”. Policy 5 later states that “The general extent of the Green Belt will be maintained except where it is required to be amended through local plans to enable the delivery of the strategic development locations”.</p> <p>Policy 1 - 60% of currently allocated land, accounting for 61,500 of the proposed housing number in Policy 1, is previously developed land. Of the 44,000 additional dwellings needed identified in Policy 1, it is estimated that 16,200 will be delivered through urban living; i.e on previously developed urban land.</p> <p>Policy 4 seeks to direct employment growth to existing employment zones and centres, thereby promoting the use of previously developed land.</p> <p>Non-strategic growth will be identified through individual plans and is likely to be a combination of brownfield and greenfield land. Strategic Development Locations which total some 17,600, account for the majority of the remaining 27,800 required dwellings and will be greenfield land.</p>	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	0	-	-	<p>No specific mention in Policy text.</p> <p>Evidence on Agricultural Land classification is not complete and it is not fully understood at this stage if land is classified as 3a or 3b land, which is a</p>	<p>Green Infrastructure Plan, NPPF.</p> <p>Wording relating to the maintaining Best and Most</p>

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
				<p>significant differentiation to make. In general, having a strategic plan will minimize loss through the identification of SDLs as development will be discouraged at inappropriate locations that may be best and most versatile agricultural land.</p> <p>Further work would be required to ascertain the agricultural land classification.</p>	versatile Agricultural Land should be included in policy – potentially within Policy 5.
4f. Minimise vulnerability to tidal/fluviial flooding (taking account of climate change), without increasing flood risk elsewhere.	0	+/?	+/?	<p>Policy 5; Clause 5 refers to “<i>mitigate and adapt to climate change and use a catchment based approach to water management</i>”.</p> <p>Policy 6 states “<i>New development must be properly aligned with the provision of the necessary strategic infrastructure</i>”, and identifies the need for strategic flood management infrastructure at Avonmouth/Severnside; and the River Avon relating Bristol City Centre.</p> <p>The Plan gives direction to Local Plans for the approach to Flood Management. Each authority will be responsible for identifying issues and addressing those on a case by case basis.</p>	Strategic flood management plans and risk assessments will identify problematic areas at local level.
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	0	+/?	+/?	<p>Policy 5; Clause 5 refers to “<i>mitigate and adapt to climate change and use a catchment based approach to water management</i>”.</p> <p>Policy 6 states “<i>New development must be properly aligned with the provision of the necessary strategic infrastructure</i>”, including flood management.</p> <p>The Plan gives direction to Local Plans for the approach to Flood Management. Each authority will be responsible for identifying issues and addressing those on a case by case basis.</p>	Strategic flood management plans and risk assessments will identify problematic areas at local level.
4h. Minimise harm to, and where possible improve, water quality and availability	0	+/?	+/?	<p>Policy 5; Clause 5 refers to “<i>mitigate and adapt to climate change and use a catchment based approach to water management</i>”.</p> <p>The Plan gives direction to Local Plans for the approach to Flood Management. Each authority will be responsible for identifying issues and addressing those on a case by case basis.</p>	Strategic flood management plans and risk assessments will identify problematic areas at local level.

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	0	+	+	<p>Policy 5; Clause 7 requires the provision and access to “<i>infrastructure including public transport, which reduces reliance on use of cars</i>”.</p> <p>Policy 6 explicitly requires the implementation of transport infrastructure to support the delivery of the Plan and states priority will be given to development schemes that benefit the delivery of the wider spatial strategy in Policy 2.</p> <p>The Plan explicitly highlights the importance of new infrastructure where growth is identified, particularly through SDLs.</p>	<p>Policy 6 will be supported by the West of England Joint Infrastructure Delivery Programme.</p> <p>Policy 7 indicates where strategic growth is proposed, key new infrastructure has been identified within the relevant location policy section.</p> <p>Other, more localised infrastructure will also be required and this will be identified through local plans.</p>
5b. Reduce non-renewable energy consumption and ‘greenhouse’ emissions, and provide opportunities to link into existing heat networks	0	+	+	<p>Policy 5; Clause 6 states “<i>Minimise energy demand and maximise the use of renewable energy, where viable meeting all demands for heat and power without increasing carbon emissions</i>”.</p>	

### Policy Commentary

#### Policy 1: The housing requirement

The thrust of Policy 1 is the underlying principle of the Plan - that the sustainable future of the region is through growth - and so sets out the housing requirements for the region. The housing target is based upon the calculated need for each authority area and then forms the basis of the wider strategy and the identification of Strategic Development Locations (SDLs) and the distribution of

## Appendix C

growth throughout the region. Inherently, the delivery of housing and, therefore, growth has strong benefits for the economic and social sustainability of the region and would help address key issues relating to social and economic disparities.

However, in isolation and without mitigation, there is potential for the delivery of such large numbers of new homes to cause harm to the environment and, in the wrong locations, would not necessarily deliver on overall economic and social sustainability objectives. As such, the role of the spatial strategy must be incorporated into the assessment of the sustainability of Policy 1, which is recognised in the policy itself. With the identification of SDLs, new development is encouraged towards the most suitable locations in terms of specific sustainability issues – the individual SDLs also form part of this Sustainability Assessment – and the risk of haphazard delivery of homes is greatly reduced.

Primarily, potentially negative impacts arising from the delivery of housing (such as to Green Infrastructure, flood management or pressure on the existing built environment) are mitigated through the rest of the Plan's policies, which seek to address such risks.

One point on concern would relate to air quality where, although other policy requirements would have indirect consequences, the issue of air quality impact should be made more explicit in the Plan. It is recognised that, in the majority of SDLs, a Transport Impact Assessment would be a policy requirement and non-strategic growth will be allocated in individual Local Plans where there issues can be addressed.

### Policy 2: The spatial strategy

The spatial strategy relates predominantly to sustainability objectives 2a and 2b, although through individual SDL policy can broaden out to include objective relating to employment, infrastructure. Therefore, the policy also links strongly with Policy 4.

Policy 5 is the mitigation against poorly located strategic development and preventing harmful impacts that development in unsuitable locations would bring, such as impacts on valuable landscapes or where poor accessibility to services exist. As Policy 5 is part of the delivery mechanism for Policy 1, the commentary for that policy is also relevant here.

## Appendix C

### Policy 3: The affordable housing target

Similar to Policy 1, Policy 3 specifies the target figure for Affordable Housing for the region and, in terms of assessing against sustainability objectives, should be read in the wider context of the strategic policies. The policy seeks to ensure a suitable mix of housing types, relevant only to objective 2b, and mitigation to development would be through the remaining policies of the Plan. Non-strategic growth will be allocated in individual Local Plans where there issues relating to viability can be addressed.

### Policy 4: The employment requirement

The growth of employment land is inextricably linked to the growth in housing numbers and, therefore, supplying the appropriate quantum of employment land increases the economic and social sustainability of the region. In respect to specific sustainability objectives, the policy relates to objectives 3a and 3b; setting out the overall targets for employment growth in the region to meet need.

Policy 4 prioritises the delivery of employment land at existing employment Enterprise Zones and Areas as well as designated Town Centres. These locations are generally in sustainable locations with existing infrastructure in place. Where employment need has been identified at SDLs, the level will be appropriate to the site, which will be determined at a later date and mitigation will take place according to the individual location.

Both existing and new locations of employment growth must be mitigated with suitable transport infrastructure to ensure good access as growth continues, however, the policy does explicitly reference south Bristol, Bath and Weston-Super-Mare as areas where access to employment will be supported.

In terms of environmental sustainability, the Policy prioritises and encourages development on previously developed land, minimising loss of green infrastructure and minimising flood risk and other environmental concerns.

Intensifying areas within Flood Risk areas may be an issue and further assessments would be needed.

## Appendix C

### Policy 5: Place-shaping policies

Policy 5 provides a set of principle for development to follow, both at SDLs and non-strategic development and support a wide range of sustainability issues. As such, the policy scores well against the majority of sustainability objectives.

When assessed against the objectives, however, there are gaps, as the policy makes no reference to minimising loss of agricultural land nor makes emphasis of development on previously developed land, although does encourage 'regeneration led development'. Development on previously developed land is advocated through Policy 5 and so is also mitigated against within the Plan. In order to achieve a more positive score, mention should be made of minimising loss of best quality agricultural land within the Plan.

### Policy 6: strategic infrastructure requirements

Policy 6 essentially acts as mitigation to ameliorate any impacts of delivering the scale of growth the Plan seeks and identifies key strategic infrastructure, relating to transport, energy and flooding among others, that is critical to support housing and employment growth.

The policy does not explicitly state what the requirements will be, but defers to the West of England Infrastructure Delivery Programme. and to individual Local Plans to pinpoint where infrastructure will be required and programme the delivery timescales. These infrastructure plans are essential in the mitigation of the Plan.

Where key infrastructure is required to deliver SDLs, this has been identified in each individual location.

## Appendix C

### Summary of SA Findings (long-term effects) for Strategic Development Locations

<b>Strategic Development Location</b>	<b>1a</b>	<b>1b</b>	<b>1c</b>	<b>2a</b>	<b>2b</b>	<b>2c</b>	<b>2d</b>	<b>2e</b>	<b>2f</b>	<b>3a</b>	<b>3b</b>	<b>4a</b>	<b>4b</b>	<b>4c</b>	<b>4d</b>	<b>4e</b>	<b>4f</b>	<b>4g</b>	<b>4h</b>	<b>5a</b>	<b>5b</b>
B&NES 7.1 North Keynsham	+	-/?	+	++	++	+	+	+	0	++	+	?	-/?	--	--	?/-	+	+/-	0	+/?	?
B&NES 7.2 Whitchurch	+	?	+	++	++	+	+	+	0	+/?	+	?	-/?	--	--	?	++	+/-	0	+/?	?
Bristol 7.3 Brislington	+	-	-/+	++	++	+/?	+	+/?	0	+/?	+	?	-/?	?	-	?	+	+/-	0	+/?	?
NSC 7.4 Backwell	+/?	+	+/?	++	++	+/?	++	-	0	+/?	++	0	+	0/--	--	--	++	+/-	?	++	?
NSC 7.5 Banwell Garden Village	+/?	+/?	+/?	++	++	+/?	++/ --	-	0	+	+	?	?/-	--	--	?	++	+/-	?/-	+/-	?
NSC 7.6 Churchill Garden Village	++	+	+/?	++	++	+/?	++	--	0	+/?	+/-	++	-/?	--	--	?	++	+/-	0	+/?	?
NSC 7.7 Nailsea	+/?	+	+/?	++	++	+/?	++	+/-	0	+/?	++	0	0/?	--	--	--	++	+/-	?	++	?
SGC 7.8 Buckover Garden Village	+	+/?	-	++	++	+	+	-	0	+	-	?	?	-	--	--	++	+/-	0	-	+

## Appendix C

SGC 7.9 Charfield	+	+	-	++	++	+	++/-	-	0	+	-	?	?	-	--	+/?	+	+/-	0	-	?
SGC 7.10 Coalpit Heath	+	+	+	++	++	+/?	+/-	-	0	+	+	?	0	-	--	+/?	+	+/-	0	+	?
SGC 7.11 Thornbury	+	+	+	++	++	-/?	+	+	0	++	+	?	?	-/--	--	--	+	+/-	0	+	?
SGC 7.12 Yate	++	+/?	+	++	++	+	+/-	+	0	++	+	-/?	?	-/--	--	?/+	+/-	+/-	0	+	?
<b>Strategic Development Location</b>	<b>1a</b>	<b>1b</b>	<b>1c</b>	<b>2a</b>	<b>2b</b>	<b>2c</b>	<b>2d</b>	<b>2e</b>	<b>2f</b>	<b>3a</b>	<b>3b</b>	<b>4a</b>	<b>4b</b>	<b>4c</b>	<b>4d</b>	<b>4e</b>	<b>4f</b>	<b>4g</b>	<b>4h</b>	<b>5a</b>	<b>5b</b>



Sustainability Appraisal of the Joint Spatial Plan Publication Version						
Strategic Location:		North Keynsham				
<p>Summary</p> <ul style="list-style-type: none"> <li>• Good link to National Cycle Route 4, Regional 16, Avon Cycle Route and other local routes. East part of the area has good access to Manor Wood and Saltford Community Association recreational grounds.</li> <li>• An AQMA was declared for the Centre of Keynsham. It is also closely linked to the AQMA in Saltford.</li> <li>• There is a relatively good range of healthcare facilities and community services in Keynsham Town Centre. It also has good public transport links to large urban centres in Bath and Bristol.</li> <li>• Policy requires a new local centre with facilities to provide a focus for the new community to meet their needs including a new primary school.</li> <li>• Policy facilitates around 1,500 new homes of which 1,400 homes in the plan period.</li> <li>• In general good access to local employment sites, Bristol EZ and Bath EA with public transport and Policy facilitates around 50,000 sq.m of employment space.</li> <li>• Parts of the area are highly sensitive associated with Keynsham and Queen Charlton Conservation Areas.</li> <li>• Some land is or close to protected ecological sites the Stidham farm geological SSSI of which a small part is a RIG. The River Avon SNCI runs north of the site boundary, The Broad Mead SNCI field lies entirely within the site at the eastern end.</li> <li>• Cotswolds AONB lies east of Saltford.</li> <li>• Policy facilitates the implementation of key transport infrastructure prior to the housing development.</li> <li>• Mainly Flood Zone 1. Existing industrial area is within FZ2.</li> </ul>						
Sustainability Objective	S/T	M/T	L/T	Commentary		Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	+	+	Good link to National Cycle Route 4, Regional 16, Avon Cycle Route and other local routes. East part of the area has good access to Manor Wood. Saltford Community Association recreational grounds.		Policy requires a well-integrated and multifunctional green infrastructure network

## Appendix C

1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	-/?	-/?	An AQMA was declared for the Centre of Keynsham in July 2010. Development may cause pressure on the key transport network impacting on air quality. It is also closely linked to the AQMA in Saltford.	Policy requires a full Transport Assessment. Transport Impact Assessment and adequate preventative and mitigation measures are required.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	+	+	There is a relatively good range of healthcare facilities and services in Keynsham Town Centre. It also has good public transport links to large urban centres – Bath and Bristol – with healthcare facilities. However some areas are quite remote from the town centre and beyond a reasonable walking distance of facilities.  East part of the area is within 1200m of the Doctor Surgery in Saltford. All facilities in Keynsham are beyond a reasonable walking distance of facilities. There is currently no public transport route to the area.	This level of strategic growth may require mitigation or future provision of health facilities. This would need to be identified at masterplanning stage.  Policy requires a new local centre with facilities to provide a focus for the new community to meet their needs including healthcare facilities.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	Policy facilitates around 1,500 new homes of which 1,400 homes in the plan period.  This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	0	++	++	No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing.	Policy 3 sets a minimum target of 35%.

## Appendix C

2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	0	+	+	<p>There is a good range of community facilities and services in Keynsham Town Centre as the second largest town in the district. In general it also has good public transport links to large urban centres – Bath and Bristol – with good community facilities. However Area S1 is largely remote from these centres.</p> <p><i>Community Facilities:</i> No existing community facilities located within the site area or within a reasonable distance.</p>	Policy requires a new local centre with facilities to provide a focus for the new community to meet their needs.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	0	+	+	<p>There are currently 5 primary schools and 3 secondary schools in the town however there is no or limited capacity to accommodate primary school students from new development. Within 1500m from Wellsway School.</p>	Policy requires a new primary school on site and financial contribution to the provision of a secondary education provision off site.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	0	+	+	<p>There is a relatively good range of town centre uses in Keynsham. Eastern part of the area is within 1500m of Salford centre.</p>	Policy requires a new local centre with facilities to provide a focus for the new community to meet their needs.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	0	0	0	<p>It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).</p>	
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region	0	++	++	<p>Policy facilitates around 50,000 sq.m of employment space.</p>	

## Appendix C

3b. Achieve reasonable access to major employment areas	0	+	+	In general good access to local employment sites, Bristol EZ and Bath EA with public transport.	
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	0	?	?	Parts of the area are highly sensitive associated with Keynsham and Queen Charlton Conservation Areas.	<p>The area with high sensitivity should be avoided.</p> <p>Policy requires a layout and form that produces a high quality of urban design, contributes positively to local character and distinctiveness, and mitigates impact on sensitive views (including key views from the Cotswold AONB).</p>

## Appendix C

<p>4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)</p>	<p>0</p>	<p>-/?</p>	<p>-/?</p>	<p>Some land is or close to protected ecological sites the Stidham farm geological SSSI of which a small part is a RIG. The River Avon SNCI runs north of the site boundary, The Broad Mead SNCI field lies entirely within the site at the eastern end.</p>	<p>The area with high sensitivity should be avoided. Further assessment and ecological mitigation plan are necessary.</p> <p>Policy requires a layout and form that produces a high quality of urban design, contributes positively to local character and distinctiveness, and that mitigates impact on sensitive views (including key views from the Cotswolds Area of Outstanding Natural Beauty). This should incorporate a well-integrated, multifunctional green infrastructure network that includes new wetland features, restored floodplain meadows and new woodland.</p>
<p>4c. Minimise impact on and where appropriate enhance valued landscapes</p>	<p>0</p>	<p>--</p>	<p>--</p>	<p>Cotswolds AONB lies east of Salford. Keynsham is located where the River Chew meets the River Avon. The town has principally grown out along plateau areas either side of the Chew Valley, avoiding the low lying floodplain areas of the River Avon and the River Chew; and also the steeper valley slopes of the River Chew and the Stockwood Vale tributary valleys. The beautiful valley of the River Chew funnels through into the centre of Keynsham from the south west, effectively dividing the settlement into two halves. Development resulting in the extension of the urban area into the distinctive tributary valleys of the River Avon and the Chew Valley affects the distinctive character of the existing landscape.</p>	<p>Policy requires a layout and form that produces a high quality of urban design, contributes positively to local character and distinctiveness, and mitigates impact on sensitive views (including key views from the Cotswold AONB).</p>

## Appendix C

4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	0	--	--	The western part of the area is previously developed land however majority of the development area would be greenfield. Development on greenfield land does not contribute to promoting the conservation and wise use of land.	No apparent scope for mitigation.
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	0	?/-	?/-	The majority of the area is Grade 2 and 3 therefore further detailed survey needed to identify precise land grading. Mixture of Grade 2 and Grade 3	Detailed Agricultural Land Classification (ALC) Assessment required to establish the precise land grading. Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	0	+	+	Mainly Flood Zone 1. Existing industrial area is within FZ2. To the north the area is bounded by the River Avon, which forms a corridor of fluvial Flood Zone 3 that also forms part of the functional floodplain.	New residential development should be focused on the parts of the area in Flood Zone 1, avoiding the areas identified as functional floodplain.

## Appendix C

<p>4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.</p>	<p>0</p>	<p>+/-</p>	<p>+/-</p>	<p>Areas of surface water flood risk exist along the river corridors but are largely contained within the fluvial extents.</p>	<p>Surface water runoff should be carefully managed to avoid adverse downstream impacts on Keynsham.</p> <p>Policy Principle 5 includes implementation of a sustainable drainage strategy.</p>
<p>4h. Minimise harm to, and where possible improve, water quality and availability</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>There is a small Groundwater Source Protection Zone at Somerdale, contained within the site. There are no Drinking Water Safeguard Zones nearby.</p>	

## Appendix C

<p>5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)</p>	<p>0</p>	<p>+/?</p>	<p>+/?</p>	<p>This site has particular challenges in providing suitable and appropriate access across the railway line. The railway line and A4 will act as barriers for potential future residents to access the town centre, railway station and facilities in the town by sustainable modes of travel.</p> <p>There is the opportunity for the site to benefit from access to the Bristol-Bath cycle path to the north of the site (and its link to NCN Route 410 in Saltford), which will require improvement to the existing PROW connecting to the cycle path. Maximising access to the higher frequency bus corridor on the A4 will be important for providing access to bus services in the area. Traffic generated from this site will contribute towards congestion on the A4, B3116 and in Keynsham town centre.</p> <p>Policy states that 'No housing will be completed at the North Keynsham SDL ahead of the Avon Mill Lane to A4 link, Keynsham rail station improvements and Metrobus (high quality public transport) route from Bristol to Keynsham on the A4 corridor being completed.'</p>	<p>The traffic impacts of this site will need to be considered as part of an assessment of the cumulative impact of traffic generated by other planned and proposed development sites in the West of England area.</p> <p>Policy requires provision of key transport infrastructure including:</p> <ul style="list-style-type: none"> <li>i. North Keynsham multi modal link from Avon Mill Lane to A4.</li> <li>ii. Pedestrian and cycle connections in all directions which link the site with key services and facilities.</li> <li>iii. Where existing vehicle routes across the railway line are no longer required for continued use by motor traffic, seek to downgrade them to pedestrian and cycle only links;</li> <li>iv. Metrobus route from Bristol to Keynsham on the A4 corridor;</li> <li>v. High frequency local bus service</li> <li>vi. Improved passenger facilities at Keynsham rail station;</li> <li>vii. Off-site junction improvements including at Hicks Gate; and</li> <li>viii. Expanded or relocated A4 Bristol Park &amp; Ride.</li> </ul>
---	----------	------------	------------	--	--



## Appendix C

<p>5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks</p>	<p>?</p>	<p>?</p>	<p>?</p>	<p>All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks.          No locally specific issues. General issue of dispersed growth producing longer vehicle trips.          Potential opportunities for hydropower along the river, as identified in the B&amp;NES Renewable Energy and Planning Research Update (2010)</p>	<p>Policy 4 requires;          6. Minimise energy demand and maximise the use of renewable energy, where viable meeting all demands for heat and power without increasing carbon emissions.</p>
--	----------	----------	----------	---	---

<b>Joint Spatial Plan Sustainability Appraisal</b>	
<b>Strategic Location:</b>	<b>Land South East of Bristol Whitchurch</b>
<p><b>Summary</b></p> <ul style="list-style-type: none"> <li>• The area has good access to National Route 3.</li> <li>• The northern part of the area is designated as Ecological Networks through B&amp;NES Placemaking Plan Policy NE4 and Green Infrastructure Policy NE1.</li> <li>• Not in AQMA but close to Bristol AQMA. The Council has started a short term monitoring scheme (6 months) to clarify the levels of NO2 in Whitchurch.</li> <li>• Residential expansion is likely to relate better to Bristol or Keynsham rather than Bath for local facilities. There are limited facilities at Whitchurch village. However Policy requires to provide retail, healthcare and community facilities, two new primary schools and a secondary school.</li> <li>• Policy facilitates approximately 2,500 new homes of which 1,600 homes in the plan period.</li> <li>• Policy requires to include employment spaces at a quantum and of a type to be determined though the Local Plan.</li> <li>• The west of Whitchurch village is very sensitive within the setting of the Maes Knoll, Wansdyke Scheduled Ancient Monuments and a number of listed buildings. The area towards Queen Charlton is very sensitive within the setting of Queen Charlton Conservation Area.</li> <li>• The area is located within the Dundry Plateau landscape area. The assets and aspects of significance including the Maes Knoll and Wansdyke Scheduled Ancient Monument, the historic landscape around Whitchurch, a visually important references point for much of southern Bristol and countryside to the south of the ridge and the interface with the distinctive landscape of the Chew Valley contributes to the distinctiveness of this part of the Dundry plateau area.</li> <li>• The area around the village lies almost entirely within FZ1.</li> <li>• There is good connection to Bristol with existing footpath and cycle path infrastructure, and opportunities for enhancing routes in to Keynsham.</li> <li>• Policy facilitates the implementation of key transport infrastructure prior to the housing development.</li> </ul>	

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	+	+	<p>The area has good access to National Route 3. There are a number of sites used as playing fields between Whitchurch and Stockwood and along A37. The northern part of the area is designated as Ecological Networks through B&amp;NES Placemaking Plan Policy NE4 and Green Infrastructure Policy NE1.</p> <p><i>Public Space</i></p> <ul style="list-style-type: none"> <li>The area contains open greenspace, two existing sports grounds, playing field and a playground;</li> <li>Hursley Brow football ground, village Fete Field, allotment, football and rugby pitches (Bristol Telephones RFC and Stockwood Wanderers), Stockwood Vale Golf Club</li> </ul>	A strategic level of development with appropriate on-site provision will contribute to this objective. Policy 7.2 requires to create a comprehensive green infrastructure network that reinforces and enhances the important characteristics of the area, including the existing green gaps between Whitchurch village and the Bristol urban area.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	?	?	<p>Not in AQMA but close to Bristol AQMA. The Council has started a short term monitoring scheme (6 months) to clarify the levels of NO2. This data will help to inform any decision on the need for an air quality management area in Whitchurch.</p> <p>Policy requires a full Transport Impact Assessment.</p>	Transport Impact Assessment and adequate preventative and mitigation measures are required.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	+	+	<p>Residential expansion is likely to relate better to Bristol rather than Bath for local facilities. There are limited facilities at Whitchurch village and in the adjoining urban edge of Bristol within walking or cycling distance. It is also proposed, where possible, to enhance public transport provision and cycling routes to Keynsham.</p> <p><i>Healthcare Facilities:</i></p> <ul style="list-style-type: none"> <li>Dentist located 450m to the north, at present there is no other healthcare facilities in the surrounding area that could serve the site area.</li> </ul>	Large development with good on-site facilities will benefit new and existing communities. Policy requires providing retail, healthcare and community facilities, two new primary schools and a secondary school.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	<p>Policy facilitates approximately 2,500 new homes of which 1,600 homes in the plan period. This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective.</p>	

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	0	++	++	Greenfield development is likely to be more viable than brownfield. Viability likely to be dependent upon alternative sources of funding.	Policy 3 sets a minimum target of 35%.
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	0	+	+	Residential expansion is likely to relate better to Bristol rather than Bath for local facilities, but there are limited facilities at Whitchurch village and in the adjoining urban edge of Bristol within walking or cycling distance.  Keynsham is within relatively close proximity and it is proposed to enhance cycling routes to the town.  <i>Existing Facilities:</i> <ul style="list-style-type: none"> <li>• Stockwood Lane recreation ground located within the site area: and</li> <li>• Whitchurch Cricket Club located 600m to the west.</li> </ul>	Policy requires to provide retail, healthcare and community facilities, two new primary schools and a secondary school.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	0	+	+	No or limited capacity to accommodate primary school students from new development into existing schools. The Council currently provides bus services to secondary schools in Keynsham.  Policy requires providing two new primary schools and a secondary school.	
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	0	+	+	Keynsham is the nearest town centre and is within relatively close proximity, it is proposed, where possible, to enhance public transport provision and cycling routes to the town.  The area potentially has good access to facilities within south Bristol but this is dependent on securing a good level of public transport services.	Policy requires the provision of new local centre(s) within reasonable walking distances of the new community and environmental enhancement to Whitchurch village and its local centre.

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	0	0	0	It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 20% of areas in Bath or Bristol.	
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region	0	+/?	+/?	Policy requires to include employment spaces at a quantum and of a type to be determined through the Local Plan. No specific quantum or types are identified.	
3b. Achieve reasonable access to major employment areas <i>Major Employment sites</i> Enterprise Zones Locally designated key employment areas	0	+	+	Good access to employment opportunities in Bristol with improved transport infrastructure including public transport.	Policy requires key transport infrastructure including; i. Multi modal A4 – A37 link and the south Bristol link road ii. Park and Ride iii. Metrobus route from Bristol on the A4 – A37 link iv. Pedestrian and cycle connections v. Off-site junction improvements including at Hicks Gate
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	0	?	?	The west of Whitchurch village is very sensitive within the setting of the Maes Knoll, Wansdyke Scheduled Ancient Monuments and a number of listed buildings. The area towards Queen Charlton is very sensitive within the setting of Queen Charlton Conservation Area.	The area with high sensitivity should be avoided. Policy requires protecting and enhancing areas of high landscape character and visual sensitivity including the setting of Queen Charlton Conservation Area, Maes Knoll and Wansdyke Scheduled Ancient Monuments Policy also requires mitigating impacts on sensitive views.

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change) <i>National Sites and assets</i>	0	-/?	-/?	The east of Whitchurch village is relatively unconstrained but there are a number of SNCIs. <ul style="list-style-type: none"> <li>• Sturminster Road SNCI and Stockwood Open Space SNCI</li> <li>• Carlton Bottom and Queen Charlton Watercourse SNCI</li> </ul>	The area with high sensitivity should be avoided. Further assessment and ecological mitigation plan are necessary.
4c. Minimise impact on and where appropriate enhance valued landscapes <i>National designations</i> AONB	0	--	--	The area is located within the Dundry Plateau landscape area. The assets and aspects of significance including the Maes Knoll and Wansdyke Scheduled Ancient Monument, the historic landscape around Whitchurch, a visually important references point for much of southern Bristol and countryside to the south of the ridge and the interface with the distinctive landscape of the Chew Valley contributes to the distinctiveness of this part of the Dundry plateau area.  Policy requires protecting and enhancing areas of high landscape character and visual sensitivity including the setting of Queen Charlton Conservation Area, Maes Knoll and Wansdyke Scheduled Ancient Monuments Policy also requires mitigating impacts on sensitive view	
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	0	--	--	Development on greenfield land does not contribute to promoting the conservation and wise use of land.	No apparent scope for mitigation.
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	0	?	?	The majority of the area is Grade 3 therefore further detailed survey needed to identify precise land grading. Mixture of Grade 2 and Grade 3	Further Agricultural Land Classification (ALC) assessment to identify Grade 3a and 3b is necessary.
4f. Minimise vulnerability to tidal/fluviial flooding (taking account of climate change), without increasing flood risk elsewhere.	0	++	++	The area around the village lies almost entirely within FZ1. A small area of fluvial FZ2 flows a tributary of Brislington Brook that flows between Whitchurch Park and Stockwood.	New residential development should be focused on the parts of the area in Flood Zone 1, avoiding the areas identified as functional floodplain.

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	0	-/+	-/+	Several parts of the area are at risk of surface water flooding, with particular areas west of A37, along Queen Charlton Lane and adjoining the settlement area of Whitchurch in Bristol.	Policy Principle 5 includes implementation of a sustainable drainage strategy.
4h. Minimise harm to, and where possible improve, water quality and availability	0	0	0	There are no Groundwater Source Protection Zones nearby. There are no Drinking Water Safeguard Zones nearby.	
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	0	+/?	+/?	<p>This area is not within a reasonable distance to railway stations.</p> <p>There is good connection to Bristol with existing footpath and cycle path infrastructure, and opportunities for enhancing routes in to Keynsham. The area also benefits from existing bus services which provide a regular service to Keynsham, Bristol and Bath.</p> <p>Existing Sustainable Transportation:</p> <ul style="list-style-type: none"> <li>• PROWs run through the site area which provide connection to Whitchurch;</li> <li>• Cycle paths are located immediately north (A37) and south (Norton Lane); and</li> <li>• Area is well serviced with a number of bus stops along the A37 which provide regular bus services.</li> </ul> <p>Policy stats that No housing will be completed at the Whitchurch SDL ahead of:</p> <ol style="list-style-type: none"> <li>Park and Ride, and</li> <li>the multi-modal link A4-A37-south Bristol link including as a pre-requisite, the Callington Road scheme being completed.</li> </ol>	<p>The traffic impacts of this site will need to be considered as part of an assessment of the cumulative impact of traffic generated by other planned and proposed development sites in the West of England area.</p> <p>Policy requires key transport infrastructure including;</p> <ol style="list-style-type: none"> <li>Multi modal A4 – A37 link and the south Bristol link road</li> <li>Park and Ride</li> <li>Metrobus route from Bristol on the A4 – A37 link</li> <li>Pedestrian and cycle connections</li> <li>Off-site junction improvements including at Hicks Gate</li> </ol>

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	?	?	?	All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks	Large scale development will provide an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved. Policy 4 requires; 6. Minimise energy demand and maximise the use of renewable energy, where viable meeting all demands for heat and power without increasing carbon emissions.



<b>Sustainability Appraisal of the Joint Spatial Plan Publication Version</b>	
DIAGRAM TO BE INSERTED	
<b>Strategic Location:</b>	<b>Land at Bath Road,</b>
<p><b>Highlights:</b></p> <ul style="list-style-type: none"> <li>• Near Stockwood Local Nature Reserve, which sits to the south of the location, while Durley Park is found to the east. Bath Road Allotments are located adjacent to the location.</li> <li>• The provision of at least 750 new homes.</li> <li>• The area is not within an Air Quality Management Area, but sits between the Keynsham and Bristol AQMAs.</li> <li>• There is good public transport availability along the A4 to SE Bristol, Keynsham and Bath where a range of facilities, jobs and services can be accessed.</li> <li>• Although on-site development would be residential led, a mix of uses is also being encouraged in policy. These supporting uses will be identified through the masterplanning process.</li> <li>• The Grade II Registered Garden of Brislington House, along with the Avon Valley Conservation Area terminates at the northern side of the A4.</li> <li>• The surface water flooding area follows the path of Scotland Bottom and generally follow the areas of Flood Zone.</li> </ul>	

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	+	+	<p>There is a good range of different types of space within the walking distance of the location. The area is near to Stockwood Local Nature Reserve, which sits to the south of the location, while Durley Park is found to the east. Bath Road Allotments are located adjacent to the location.</p> <p>Though not designated, there is easy access to the wider countryside, historic wood land and other natural green sites via main cycle routes and the River Avon Trail.</p> <p>Provision of a further new recreational linear park will be made through development of the site is a policy requirement.</p>	<p>The creation of a new recreational facility would provide a benefit to both potential future residents and wider existing residents in accordance with local open space standards.</p> <p>Policy 7.3 requires provision of a linear recreational park incorporating Scotland Bottom watercourse to allow for maintenance of the watercourse and the protection and enhancement of nature conservation. The park should include walking and cycling routes</p>
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	-	-	<p>The area is not within an Air Quality Management Area, but sits between the Keynsham and Bristol AQMAs. Given the nature of the A4, it would be likely that the AQMA would have to be reviewed as part of a wider Transport Impact Assessment.</p>	<p>Transport Impact Assessment and adequate preventative and mitigation measures are required.</p>
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	-/+	-/+	<p>There is good public transport availability along the A4 to SE Bristol, Keynsham and Bath where a range of facilities can be accessed.</p> <p>Although on-site development would be residential led, a mix of uses is also being encouraged in policy. These supporting uses will be identified through the masterplanning process.</p>	<p>This level of strategic growth may require mitigation or future provision of health facilities. This would need to be identified at masterplanning stage.</p> <p>New transport infrastructure, including pedestrian and cycling links connected to the location, is a policy requirement. This will improve current connectivity for the wider area as a whole.</p>

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	An approximate 750 homes will be provided at the location.  This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective and the housing need of the region.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	0	++	++	No specific local issues. The site is a mix of green and brown field. Greenfield development is likely to be more viable than brownfield, therefore, the majority of the location could provide more certainty for the delivery of a mix of suitable tenures.	Policy 3 sets a minimum target of 35%.
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	0	+/?	+/?	A range of community facilities exist in the Brislington and Keynsham areas, accessible via public transport.  Although on-site development would be residential led, a mix of uses is also being encouraged in policy. These supporting uses will be identified through the masterplanning process.	This level of strategic growth may require mitigation or future provision of community facilities. This would need to be identified at masterplanning stage.  New transport infrastructure, including pedestrian and cycling links connected to the location, is a policy requirement. This will improve current connectivity for the wider area as a whole.  Policy 7.13 has no specific requirements.

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	0	+	+	There are schools within the existing urban areas. Within Bristol, there are 4 primary schools and 3 secondary schools within reasonable distance of the edge of the settlement.	This level of strategic growth would be expected to contribute to primary school places and this mitigation would be required. It is a policy requirement that off-site contribution to the provision of primary school places is made.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	0	+/?	+/?	<p>Keynsham Town Centre (approx 1.5km away) is accessible by public transport, but beyond comfortable walking distance. Brislington Local Centre is also approximately 1.5km away, but is too low in the centre hierarchy to be scored here. Both Bristol and Bath City Centres can be accessed by public transport.</p> <p>Although on-site development would be residential led, a mix of uses is also being encouraged in policy. These supporting uses will be identified through the masterplanning process.</p>	<p>This level of strategic growth will require mitigation or future provision of retail facilities. The level of provision would need to be identified at masterplanning stage.</p> <p>New transport infrastructure, including pedestrian and cycling links connected to the location, is a policy requirement. This will improve current connectivity for the wider area as a whole.</p>
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	0	0	0	It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).	If development is to be used to benefit nearby disadvantaged areas, the means to do this must be specified.

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region.	0	+/?	+/?	<p>Although on-site development would be residential led, a mix of uses is also being encouraged in policy. These supporting uses will be identified through the masterplanning process.</p> <p>New transport infrastructure, including pedestrian and cycling links connected to the location, is integral to the development of the location and is a policy requirement. This will improve current connectivity for the wider area as a whole.</p>	
3b. Achieve reasonable access to major employment areas	0	+	+	<p>There is good public transport access to both the Bristol EZ and Bath EA. The Brislington Trading Estate PIWA is located approx. 0.5km north west along Bath Road and Keynsham Industrial Estate is approx. 2km southbound on the A4.</p>	<p>New transport infrastructure, including pedestrian and cycling links connected to the location, is integral to the development of the location and is a policy requirement. This will improve current connectivity for the wider area as a whole.</p>
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	0	?	?	<p>The Grade II Registered Garden of Brislington House, along with the Avon Valley Conservation Area terminates at the northern side of the A4, but does not encroach into the strategic location. Brislington House Lodge itself is also Grade II Listed and found immediately on the opposite side of the A4, leading to the Grade II listed Long Fox Manor. The Grade II Listed 1 and 2 Oakleigh are also found to the north.</p>	<p>Further heritage assessment may be necessary.</p> <p>Ensuring no harm to valuable heritage assets would need to inform the design process.</p>
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	0	-	-	<p>The strategic location is outside any designated ecological areas, but skirts SNCI land to the south in Stockwood Local Nature Reserve.</p> <p>An area of Priority Habitat deciduous woodland is found within the location.</p> <p>The Bickley Wood SSSI is also north of the River Avon, whose impact zones include the settlement area.</p> <p>Policy requires the protection and enhancement of nature conservation.</p>	<p>Appropriate mitigation may be necessary once the nature of development has been determined and if there is sufficient impact on protected habitats. This would be through planning obligations.</p>

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
4c. Minimise impact on and where appropriate enhance valued landscapes	0	?	?	<p>The area is located within the Hicks Gate landscape character area. Not in proximity to AONB. The location itself mostly medium sensitivity landscape value and provides green relief with views from the A4 with hedgerows and trees. There is a network of very good, thick, tree-lined hedgerows with scrubby woodland, and Scotland Bottom stream to the south requiring protection.</p> <p>There is a mixture of high to medium landscape in the surrounding area. To the north of the A4 is a recognised heritage landscape in Brislington House Gardens, and to the south is a prominent and attractive ridge line, forming a green visual backdrop to the character area and adjacent areas.</p> <p>The retention of hedgerows within the location and the integration of Scotland Bottom in any future design is a policy requirement.</p>	The retention of hedgerows within the location and the integration of Scotland Bottom in any future design is a policy requirement.
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	0	-	-	The location includes previously developed land at Bath Road Park and Ride and existing garden centre, though the majority of the site is greenfield and therefore would not contribute towards this objective.	No scope for mitigation.
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	0	?	?	Data and information is limited. Location is classified predominantly as urban land, which does potentially include Grade 3 land.	Detailed Agricultural Land Classification (ALC) Assessment required to establish the precise land grading. Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	0	+	+	Mainly FZ1. Both FZ2 and FZ3 run along the southeast boundary on the southern section, along Scotland Bottom, and intrude somewhat into the area.  Policy requires SuDS strategy to ameliorate exiting issues along Scotland Bottom.	New residential development should be focused on the parts of the area in Flood Zone 1, avoiding the areas identified as functional flood plain.  Policy requires SuDS strategy to ameliorate exiting issues along Scotland Bottom.
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	0	+/-	+/-	The surface water flooding area follows the path of Scotland Bottom and generally follow the areas of Flood Zone.  Policy requires SuDS strategy to ameliorate exiting issues along Scotland Bottom.	Policy requires SuDS strategy to ameliorate exiting issues along Scotland Bottom.
4h. Minimise harm to, and where possible improve, water quality and availability	0	0	0	There are no Groundwater Source Protection or Drinking Water Safeguard Zones nearby.	
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	0	+/?	+/?	The settlement surrounds Bath Road (A4) with good access to sustainable transport. The road is a major bus route with dedicated bus lanes and numerous bus stops. Regional Route 16 of the Sustrans cycle network is nearby. The nearest train station is in Keynsham.  The development of the location is dependent on key transport infrastructure improvements, set out in the policy. This includes a range of pedestrian and cycling links, upgrading the A4 corridor for public transport and new link roads.	The Bath Road park and ride is located within the strategic location and would require to be relocated as a policy requirement – minimising the impact of any loss.

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	?	?	?	All development will need to adhere to national and each council's planning policies related to energy provisions. Proximity to Bristol may provide opportunities to link up with existing heat networks. However, there is no evidence at present that this is feasible.	Large scale development provides an opportunity to incorporate larger scale, low carbon schemes which potentially allows higher standards to be achieved. This would be determined at the design stage. Policy 4 requires; 6. Minimise energy demand and maximise the use of renewable energy, where viable meeting all demands for heat and power without increasing carbon emissions.



Sustainability Appraisal of the Joint Spatial Plan Publication Version					
DIAGRAM TO BE INSERTED					
<b>Strategic Development Location:</b>		<b>Backwell</b>			
<p><b>Highlights:</b></p> <ul style="list-style-type: none"> <li>• Village expansion, accessible to largely existing facilities, with some enhancements required.</li> <li>• Lack of capacity on A370 corridor – Backwell crossroads a particular constraint.</li> <li>• Existing station and opportunity to improve links to Bristol with MetroBus.</li> <li>• Ecological issues related to bat foraging and commuting routes.</li> <li>• Impact on nearby heritage assets to be considered.</li> <li>• Loss of high-grade agricultural land.</li> <li>• Local surface water flooding issues.</li> </ul>					
Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement

## Appendix C

1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	+/?	+/?	Backwell Lake LNR is nearby, though a 400m radius extends only slightly south of the railway. Backwell is flanked by National Cycle Routes to the west (410: Avon Cycleway) and east (33: Festival Way) and there is a local cycle route along Backwell Common. Crossed by PRoWS running into countryside. Adjoins outdoor playing space near Luntly Mead.	Strategic level of development with appropriate on-site provision would contribute to this objective. Policy 7.4 has no specific requirements.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	+	+	There is no AQMA in the area.	Transport Impact Assessment and adequate preventative and mitigation measures are required.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	+/?	+/?	Backwell has a GP practice/health centre (plus 3 in Nailsea), pharmacy (plus 4 in Nailsea) and dentist (plus 3 in Nailsea). No hospital. No opticians (nearest is Nailsea).	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.4 has no specific requirements.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy suggests 700 dwellings.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	0	++	++	No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy suggests 30%, namely 210.	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	0	+/?	+/?	Backwell has a post office, village hall and youth centre. There is no library (the nearest is Nailsea) but there are 2 mobile library stops. Eastern part is within 600m of village facilities.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.4 has no specific requirements.

## Appendix C

2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	0	++	++	Two primary schools serve the village but these comprise West Leigh Infants and Backwell Junior, on widely separated sites. Within 800m of West Leigh only. There is a secondary school in Backwell and another nearby at Nailsea. All within 1500m of Backwell School. Empty places at primary level are predicted for 2015-2019, with an increasing trend. A shortfall in secondary places is predicted for 2015-2021. Empty places are predicted at Nailsea School over the same period, with an increasing trend.	Should strategic growth be proposed, work will be required to assess existing capacity in the context of projected requirements. Scoring assumes delivery of Policy 7.4 requirement for additional primary school.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	0	-	-	Local Centre only. More than 1500m from any town / district centre. Over 5km from any city centre or equivalent but on bus / rail routes to Bristol / WsM.	
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	0	0	0	It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).	
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region	0	+/?	+/?	Currently limited local employment opportunities. Local Plan employment allocation at Moor Lane has not been taken up.	Policy 7.4 requires delivery of about 8.2ha of employment land to be investigated but does not require delivery to be achieved, hence scoring cannot be '++'. Given uncertainty of deliverability, score has been revised to '+/?'.
3b. Achieve reasonable access to major employment areas	0	++	++	No major employment area, though Temple Quarter EZ is accessible by rail. Backwell is well-placed to continue to serve as a commuter settlement with rail access to central Bristol and Weston-super-Mare but transport capacity constraints may restrict this.	Policy 7.4 requires phasing in line with transport improvements. Scoring assumes delivery of these.
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	0	0	0	Important to maintain open aspect around Chelvey and West Town Conservation Areas. Grove Farm is listed.	Impacts could largely be mitigated through provision of open space buffers around heritage assets. Developable area is large enough do this without difficulty.

## Appendix C

					Policy 7.4 requires sensitive treatment of listed building's setting. Scoring assumes this results in a neutral impact.
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	<b>0</b>	<b>+</b>	<b>+</b>	Wildlife Sites at Backwell are on the higher ground to the south and east and along the River Kenn. Backwell Lake is a LNR. There are patches of Priority Habitat in and around the village. The proposed development location itself is free from biodiversity designations but there are likely to be bat foraging and commuting routes associated with this land.	Further ecological assessments would be required. However it is considered that mitigation is readily achievable through the integration of certain ecological features as part of any new development. Policy 7.4 requires safeguarding and enhancement of bat habitat. Scoring assumes this results in a positive impact.
4c. Minimise impact on and where appropriate enhance valued landscapes	<b>0</b>	<b>0/--</b>	<b>0/--</b>	Not in proximity to AONB. Impact on setting of hills to south. The area is within the Land Yeo and Kenn Rolling Valley Farmland landscape character area, a pastoral landscape intermediate between the valley floor and wooded limestone ridges. It is marked by stone farmsteads, thick hedgerows, winding rural lanes and modern ribbon / infill development along the A370. Area is considered to be of medium / medium to high / high sensitivity, with sensitivity generally increasing towards higher ground.	
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	<b>0</b>	<b>--</b>	<b>--</b>	Development would be greenfield. Development on greenfield land does not contribute to promoting the conservation and wise use of land. Therefore all locations have a negative effect on this objective and there is no apparent scope for mitigation.	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	<b>0</b>	<b>--</b>	<b>--</b>	Detailed surveys already exist of almost all the land between Backwell and Chelvey. Proposed development location is confirmed as partly Grade 2/3a.	Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).

## Appendix C

4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	0	++	++	Within Flood Zone 1.	
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	0	+/-	+/-	There are wide areas of surface water flood risk associated with the River Kenn and its tributaries, including those running down from Backwell Hill, some of which appear to be culverted beneath modern development. There is another large area at risk NE of Grove Farm. There are possible issues of groundwater flooding associated with Backwell Hill, which is a Groundwater Source Protection Zone.	Surface water runoff should be carefully managed to avoid adverse downstream impacts on Clevedon.
4h. Minimise harm to, and where possible improve, water quality and availability	0	?	?	Backwell is within the Groundwater Source Protection Zone for Chelvey spring. There are no Drinking Water Safeguard Zones nearby.	Further engagement with regulators is necessary to understand what constraints or opportunities exist. The constraint on land north of the A370 is identified as 'subsurface activity only'.
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	0	++	++	Existing rail station (Nailsea & Backwell), although no current capacity considered at AM and PM peaks. Good bus links to Bristol. Lack of capacity on A370 corridor – Backwell crossroads a particular constraint. Mostly within 800m of the station and accessible via existing roads/PRoWs.	Policy 7.4 requires phasing in line with transport improvements. Scoring assumes delivery of these.
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	0	?	?	All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks. No locally specific issues. General issue of dispersed growth producing longer vehicle trips.	Large scale development provides an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved. JSP seeks investigation of zero carbon development.

Sustainability Appraisal of the Joint Spatial Plan Publication Version					
DIAGRAM TO BE INSERTED					
<b>Strategic Development Location:</b>		<b>Banwell Garden Village</b>			
<p><b>Highlights:</b></p> <ul style="list-style-type: none"> <li>• New development location with potential for community infrastructure package.</li> <li>• Not currently well-located in relation to employment, retail or public transport, though close to Weston-super-Mare.</li> <li>• Delivery of Banwell Bypass would enable environmental conditions in the centre of Banwell to be improved.</li> <li>• No secondary school.</li> <li>• Ecological sensitivities in relation to bat flight corridors.</li> <li>• Impact on AONB to the south.</li> <li>• Low flood risk generally but some surface water issues.</li> </ul>					
Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	+/?	+/?	Currently agricultural land detached from facilities in the existing village of Banwell. Development here would connect existing PROWs and is of a scale that could deliver new public open space to meet its own needs and those arising from the existing village.	Strategic level of development with appropriate on-site provision would contribute to this objective. Policy 7.5 has no specific requirements.

## Appendix C

1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	+/?	+/?	There is no AQMA in this location. Not adjacent to motorway but could be within 200-300m. M5 is in cutting at this location. Bypass would reduce traffic impact in centre of Banwell and so improve air quality there.	Transport Impact Assessment and adequate preventative and mitigation measures are required. Distance from housing could be increased by zoning employment as buffer.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	+/?	+/?	Banwell has a GP practice and pharmacy (plus others at Locking and Winscombe). Only SE edge of proposed development location is within 1200m. No hospital. No dentist or opticians (nearest are Winscombe and Worle). Population growth in the broader Weston-super-Mare area would contribute to the development of services at Weston General Hospital.	Should strategic growth be proposed, work will be required to assess projected requirements. Development of 1,900 dwellings could support a small satellite surgery. Policy 7.5 has no specific requirements but expects local centre provision to complement facilities in existing village.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy suggests 1,900 dwellings.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	0	++	++	No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy suggests 30%, namely 570.	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	0	+/?	+/?	Banwell has a post office, village hall and youth centre. There is no library (the nearest are Winscombe and Worle) but there is a mobile library stop. Existing village facilities are all beyond 600m of proposed development location.	Should strategic growth be proposed, work will be required to assess projected requirements. Development of 1,900 dwellings could support a new community meeting space. Policy 7.5 has no specific requirements but expects local centre provision

## Appendix C

					to complement facilities in existing village.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	0	++/- -	++/- -	There is a primary school in Banwell but no secondary school. Empty places at primary level are predicted for 2015-2019, with an increasing trend. Proposed development location is more than 800m from any primary school. More than 1500m from any existing secondary school and too small a development on its own to deliver a new one. However, a secondary school is required to serve this and the Churchill SDL, with location to be defined through more detailed masterplanning, and consideration of educational requirements across North Somerset. Policy 7.5 requires two new primary schools to serve the new development.	Should strategic growth be proposed, work will be required to assess existing capacity in the context of projected requirements. Scoring assumes delivery of Policy 7.5 requirement for additional primary schools.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	0	-	-	Existing Banwell village has a Local Centre. More than 1500m from any town / district centre. Over 5km from any city centre or equivalent.	Policy proposes bus improvements to Bristol and WsM.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	0	0	0	It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).	
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region	0	+	+	Currently limited local employment opportunities.	Policy requires mixed use development, including 5 ha of employment. This is expected to be B8, which does not have a high employment density.
3b. Achieve reasonable access to major employment areas	0	+	+	No major employment area, though close to J21 EA at Weston-super-Mare.	Policy proposes bus improvements to Bristol and WsM.



## Appendix C

4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	0	?	?	Proposed development location avoids known heritage assets but potential archæology at Stonebridge and Wolvershill Road and between East Street and Riverside requires appropriate mitigation. Environmental improvements to the centre of Banwell are proposed, dependent on the Banwell Bypass. However, these would necessarily be limited if the Bypass does not provide for a north-south link towards Winscombe, whereas the policy specifically addresses only the A368 corridor.	No direct impacts on designated areas but further archæological work may be necessary to establish what constraints exist.
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	0	?/-	?/-	Ecological sensitivities in relation to bat flight corridors. Eastern side of proposed development location is Natural England Priority Habitat.	A full HRA may be required to assess the potential impacts of any future development in the area, given SAC to the south of Banwell. Policy 7.5 requires safeguarding and enhancement of bat habitat. Scoring assumes this results in a positive impact but loss of Priority Habitat may require replacement habitat or enhancement of wildlife value of other land. The overall score is therefore negative in this respect.
4c. Minimise impact on and where appropriate enhance valued landscapes	0	--	--	Not in AONB but this is nearby, south of Banwell village. The proposed development location is within the River Yeo Rolling Valley Farmland landscape character area, a pastoral landscape intermediate between the valley floor and wooded limestone ridges. It is marked by stone farmsteads, thick hedgerows, small rural roads and modern ribbon / infill development along the A371. The area is considered to be of high sensitivity.	
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	0	--	--	Development would be greenfield. Development on greenfield land does not contribute to promoting the conservation and wise use of land. Therefore all locations have a negative effect on this objective and there is no apparent scope for mitigation.	

## Appendix C

4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	0	?	?	Provisionally Grade 3 agricultural land but Natural England's ALC Strategic Map shows potential for high-grade land on the northern edge. There are no detailed surveys of land at Banwell.	Detailed Agricultural Land Classification (ALC) Assessment required to establish the precise land grading. Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	0	++	++	Within Flood Zone 1.	Climate change additional extents should be considered in detailed layout planning.
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	0	+/-	+/-	Localised surface water flood risk. Significant area at risk north of Stonebridge. Location identified as an area susceptible to groundwater flooding.	Surface water runoff should be carefully managed to avoid further increasing flood risk in the surrounding area.
4h. Minimise harm to, and where possible improve, water quality and availability	0	?/-	?/-	There are no Groundwater Source Protection Zones nearby, except to the south of Banwell village. There is a known issue concerning cutting into Banwell Hill, raised in connection with proposals for a Banwell bypass, in which context hydrogeological studies were sought by the Environment Agency but have not been commissioned. This is an issue for this location to the extent that development relies on a full Banwell bypass scheme but not if the bypass excludes a north-south link to Winscombe. There are no Drinking Water Safeguard Zones nearby.	Development involving cutting into Banwell Hill would require further environmental assessment, including hydrogeological studies.
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	0	+/-	+/-	No rail station. Nearest is Worle (3km to the NW). Bus stops on Wolvershill Road.	Significant mitigation required. Policy 7.5 requires provision but many details remain unknown.

## Appendix C

<p>5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks</p>	<p>0</p>	<p>?</p>	<p>?</p>	<p>All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks. No locally specific issues. General issue of dispersed growth producing longer vehicle trips.</p>	<p>Large scale development provides an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved. JSP seeks investigation of zero carbon development.</p>
--	----------	----------	----------	---	--

Sustainability Appraisal of the Joint Spatial Plan Publication Version					
DIAGRAM TO BE INSERTED					
<b>Strategic Development Location:</b>		<b>Churchill Garden Village</b>			
<p><b>Highlights:</b></p> <ul style="list-style-type: none"> <li>• New development location, accessible to Churchill Academy, with potential for community infrastructure package.</li> <li>• Not currently well-located in relation to employment, retail or public transport, though relatively good for a rural area and potential for growth.</li> <li>• Impact on AONB to the south, and also sensitive local topography, particularly west of Churchill village.</li> <li>• Ecological sensitivities in relation to bat flight corridors.</li> <li>• Local surface water flooding issues.</li> <li>• High probability of BMV land.</li> </ul>					
Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village	0	++	++	Churchill has a small central open space off Rowan Way but this is remote from likely strategic development. There are no nearby large open spaces but easy access to the Mendip Hills. Churchill Batch and Havyatt Green are common land.	Strategic level of development with appropriate on-site provision would contribute to this objective. Scoring assumes delivery of Policy 7.6

## Appendix C

Greens, and Public Rights of Way)				The existing village centre (Churchill Gate) is 2.8km from National Cycle Network Route 26 (Strawberry Line). The Garden Village could have access at Sandford. There is an extensive network of PRoWs.	requirements for a Green Infrastructure network and a multi-functional network of green spaces.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	+	+	There is no AQMA in the area.	Transport Impact Assessment and adequate preventative and mitigation measures are required.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	+/?	+/?	Churchill has a GP practice on Pudding Pie Lane, capable of serving the Garden Village. No hospital. No opticians (nearest are Winscombe and Wrington). No pharmacy (nearest are Winscombe and Wrington). No dentist (nearest is Winscombe).	Should strategic growth be proposed, work will be required to assess projected requirements. Development of 2,800 dwellings could support a small satellite surgery. Policy 7.6 has no specific requirements.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy suggests 2,800 dwellings, of which 96% would be delivered within the plan period.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	0	++	++	No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy suggests 30%, namely 840.	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	0	+/?	+/?	Churchill has a post office, village hall and youth centre but these are widely separated and at the SW side of the village; only the southern parts of the proposed development location are within 600m. There is no library (the nearest are Congresbury and Winscombe) but there is a mobile library stop. Policy 7.6 requires new local centre.	Should strategic growth be proposed, work will be required to assess projected requirements. Development of 2,800 dwellings could support a new community meeting space. Policy 7.6 has no specific requirements.

## Appendix C

2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	0	++	++	<p>There are primary and secondary schools in Churchill. There is also a primary school nearby at Sandford.</p> <p>Empty places at primary level are predicted for 2015-2019, with an increasing trend. Empty places are also predicted at secondary level for 2015-2021, with a decreasing trend.</p> <p>Policy requires three new primary schools. Proposed development location is predominantly within 1500m of Churchill Academy.</p> <p>However, a secondary school is required to serve this and the Banwell SDL, with location to be defined through more detailed masterplanning, and consideration of educational requirements across North Somerset.</p>	Should strategic growth be proposed, work will be required to assess existing capacity in the context of projected requirements. Scoring assumes delivery of Policy 7.6 requirement for additional primary schools.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	0	--	--	<p>Local Centre only. More than 1500m from any town / district centre.</p> <p>Over 5km from any city centre or equivalent but on bus routes to Bristol. Policy 7.6 requires new local centre.</p>	Policy 7.6 requires transport improvements but does not specify how public transport would serve the Garden Village.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	0	0	0	<p>It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).</p>	
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region	0	+/?	+/?	<p>Currently limited local employment opportunities. Significant employers are the University of Bristol (Langford House), Monaghan Mushrooms, Churchill Academy and Thatchers Cider. Yeo Valley Foods is nearby in Blagdon parish. Policy 7.6 requires investigation of potential for about 7.4ha of employment land.</p>	Policy 7.6 requires delivery of employment land to be investigated but does not require delivery to be achieved, hence scoring cannot be '++'. Given uncertainty of deliverability, score has been revised to '+/?'.
3b. Achieve reasonable access to major employment areas	0	+/-	+/-	<p>No major employment area, though Bristol Airport in the adjoining parish of Wrington is accessible via the A38.</p>	Policy 7.6 requires transport improvements but does not specify how public transport would serve the Garden Village.

## Appendix C

4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	++	++	++	Heritage assets are associated with the existing villages of Churchill and Langford. There are none in the proposed development location but it does have potential to impact on settings. Policy requires protection and enhancement of local heritage assets and their settings and retention of Windmill Hill (potential Iron Age settlement) as a focal green feature.	Scoring assumes delivery of Policy 7.6 requirements for enhancement.
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	0	-/?	-/?	Natural environment designations are to the north (North Somerset Levels) and south (Mendip Hills) or in small parcels adjacent to the existing villages. Proposed development location is largely unconstrained except for areas of Priority Habitat near Nye Road and West Brinsea Farm. Ecological sensitivities in relation to bat flight corridors. Policy 7.6 requires safeguarding and enhancement of bat habitat and investigation of green corridor linking Windmill Hill to south of Langford and Langford Brook.	Policy 7.6 requires green corridor to be investigated but does not require delivery to be achieved, hence scoring cannot be '++'. Given uncertainty of deliverability, and that impact on Priority Habitat not addressed through specific mitigation measures, score has been revised to '-/?'.
4c. Minimise impact on and where appropriate enhance valued landscapes	0	--	--	Not in AONB but potential for indirect impact. The area is within the River Yeo Rolling Valley Farmland landscape character area, a pastoral landscape intermediate between the valley floor and wooded limestone ridges. It is marked by stone farmsteads, thick hedgerows, small rural roads and modern ribbon / infill development along the A38 and A368. Area is considered to be of high sensitivity. Sensitive local topography around Windmill Hill, which Policy 7.6 requires be retained as a focal green feature.	Policy 7.6 requirements for development form and layout and for green infrastructure may mitigate landscape impact but details are currently unknown. There may be residual impacts that cannot be mitigated. A requirement for very high quality development, informed by detailed sensitivity assessment, would minimise these.
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	0	--	--	Development would be greenfield. Development on greenfield land does not contribute to promoting the conservation and wise use of land. Therefore this location has a negative effect on this objective and there is no apparent scope for mitigation.	

## Appendix C

4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	0	?	?	<p>There are extensive areas of potentially Grade 2 agricultural land at Churchill / Langford, above the floodplain but below the higher ground, along with some Grade 1.</p> <p>There are no detailed surveys of land at Churchill.</p> <p>According to the provisional Agricultural Land Classification mapping, the proposed development location is unconstrained by BMV land but Natural England's ALC Strategic Map shows it as predominantly Grades 1 and 2.</p>	Detailed Agricultural Land Classification Assessment required to establish the precise land grading. Site definition should seek to avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).
4f. Minimise vulnerability to tidal/fluviial flooding (taking account of climate change), without increasing flood risk elsewhere.	0	++	++	Within Flood Zone 1.	
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	0	+/-	+/-	<p>There are narrow areas of surface water flood risk associated with local watercourses and roads.</p> <p>There are possible issues of groundwater flooding associated with the Mendip Hills, which are a Groundwater Source Protection Zone.</p>	Surface water runoff should be carefully managed to avoid adverse downstream impacts on Wrington and Congresbury.
4h. Minimise harm to, and where possible improve, water quality and availability	0	0	0	<p>No apparent groundwater constraints in the proposed development location. A large part of the Mendip Hills to the south are a Groundwater Source Protection Zone.</p> <p>Burrington Combe is part of a Drinking Water Safeguard Zone.</p>	
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	0	+/?	+/?	<p>No rail station. Nearest is Yatton (6km to the NW).</p> <p>Bus stops mainly on classified roads south and east of the existing village.</p> <p>A38 corridor has more capacity than A370, but impacts on local road network.</p>	Policy 7.6 requires transport improvements but does not specify how public transport would serve the Garden Village.
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	0	?	?	<p>All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks.</p> <p>No locally specific issues. General issue of dispersed growth producing longer vehicle trips.</p>	Large scale development provides an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved. JSP seeks investigation of zero carbon development.





Sustainability Appraisal of the Joint Spatial Plan Publication Version					
DIAGRAM TO BE INSERTED					
<b>Strategic Development Location:</b>			<b>Nailsea</b>		
<p><b>Highlights:</b></p> <ul style="list-style-type: none"> <li>• Town expansion, remote from all existing town facilities and so requiring extensive community infrastructure package.</li> <li>• Not currently well-located in relation to employment, retail or public transport, though potential for growth.</li> <li>• Resumed housing growth addresses demographic imbalance in Nailsea resulting from past expansion.</li> <li>• Existing station and opportunity to improve links to Bristol with MetroBus.</li> <li>• Ecological sensitivities in relation to bat flight corridors.</li> <li>• Landscape and heritage sensitivities, requiring high quality mitigation but little detail yet available.</li> <li>• Loss of high-grade agricultural land, with no apparent scope to avoid through design.</li> <li>• Low flood risk generally but complex surface water issues to be resolved affecting biodiversity and drainage.</li> </ul>					
Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement

## Appendix C

1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	+/?	+/?	The major open space within Nailsea (Scotch Horn) is more than 400m from the town's edge. There are local cycle routes within and surrounding Nailsea. Route 410 (Avon Cycleway) runs to the SW of Nailsea through Chelvey. There are PRowS within the proposed development location but these are poorly connected to the surrounding countryside to the west.	Strategic level of development with appropriate on-site provision would contribute to this objective. Policy 7.7 has no specific requirements.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	+	+	There is no AQMA in the area.	Transport Impact Assessment and adequate preventative and mitigation measures are required.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	+/?	+/?	No local hospital. Part within 5km of Clevedon Hospital. All other local health care facilities present in the town but all over 1200m from proposed development location.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.7 has no specific requirements.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy suggests 3,300 dwellings, of which 2,575 are within the plan period.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	0	++	++	There is concern locally that Nailsea's demographic profile is becoming unbalanced as the population attracted by a previous era of town expansion ages. Further housing could enable more opportunities for younger people. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy suggests 30%, namely 990, assuming 30% target continues to apply beyond the plan period, or 773 if not.	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	0	+/?	+/?	There is a relatively good range of community facilities and services within Nailsea and surrounding villages but the countryside to the west of Nailsea is not well-served. The Blue Flame public house is the only meeting place currently at the proposed development location.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.7 has no specific requirements.

## Appendix C

2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	0	++	++	<p>There are 5 primary schools in the town, of which Hannah More Infants and Grove Junior share a site. Backwell, Claverham and Tickenham also have primary schools nearby. The Nailsea group of primary schools all have a projected surplus of places (2015-2019). In some schools the surplus is projected to increase and in others to decrease.</p> <p>Nailsea has a secondary school and there is another nearby at Backwell. Nailsea is projected (2015-2021) to have an increasing surplus, while Backwell has an increasing shortfall.</p> <p>Land south and west of Nailsea is almost all beyond 800m of any primary school. Small part within 800m of Grove/Hannah More. Eastern edge only within 1500m of Nailsea Secondary School.</p>	<p>Should strategic growth be proposed, work will be required to assess existing capacity in the context of projected requirements.</p> <p>Scoring assumes delivery of Policy 7.7 requirement for additional primary and secondary schools.</p>
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	0	+/-	+/-	<p>There is a relatively good range of town centre uses in Nailsea but proposed development location is more than 1500m away and remote from existing public transport. Over 5km from any city centre or equivalent but bus / rail routes exist to Bristol / WsM.</p>	<p>Scoring assumes delivery of Policy 7.7 requirement for MetroBus corridor and improved access to station.</p> <p>Scoring would improve if proposed local centre had District Centre status but emphasis is on protection of Nailsea Town Centre, which is too remote to serve this area conveniently.</p>
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	0	0	0	<p>It is unlikely that development in this area would help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).</p>	
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within	0	+/?	+/?	<p>Nailsea does not have extensive undeveloped employment land provision. It has poor access from the strategic road network and is less attractive because of its location south of the Avonmouth Bridge. However, as a town it has some potential for economic development. Policy 7.7 requires investigation of potential for 2.3 ha employment land and proposes new transport infrastructure. Reference to additional potential for 8.2ha at Backwell duplicates Policy 7.4, assessed under Backwell.</p>	<p>Policy 7.7 requires delivery of employment land to be investigated but does not require delivery to be achieved, hence scoring cannot be '++'. Given uncertainty of deliverability,</p>

## Appendix C

the West of England sub-region					score has been revised to '+/?'.
3b. Achieve reasonable access to major employment areas	0	++	++	No EZ or locally designated key employment site. NW and NE industrial estates serve the town. Nailsea is well-placed to continue to serve as a commuter settlement with rail access to central Bristol and Weston-super-Mare but transport capacity constraints may restrict this.	Policy 7.7 requires phasing in line with transport improvements. Revised scoring assumes delivery of these.
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	0	0	0	Nailsea Court (listed building and unregistered historic park & garden) and Chelvey (listed buildings and Conservation Area) to SW. Several listed farmhouses and other buildings in the rural area.	Impacts could largely be mitigated through provision of open space buffers around heritage assets. Developable area is large enough do this without difficulty. Policy 7.7 requires protection of heritage assets and their settings. Scoring assumes this results in a neutral impact.
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	0	0/?	0/?	Wildlife designations around the town, notably to NW and south. Tickenham, Nailsea and Kenn Moors SSSI lies to the NW of the town. Relates to the watercourses rather than large expanses of land. There is a scatter of Wildlife Sites and small areas of Priority Habitat directly affecting land south and west of Nailsea. Ecological sensitivities related to bat flight corridors and foraging habitat.	Policy 7.7 requires protection and enhancement of bat habitat. Scoring assumes this results in a neutral impact. However, potential for a dark corridor is not proven and indirect impact on SSSI may need to be assessed, so overall score is '0/?'. Important overlap with surface water drainage issues affecting aquatic environment (water levels and quality) of the Moors.

## Appendix C

4c. Minimise impact on and where appropriate enhance valued landscapes	0	--	--	Not in proximity to AONB. Nailsea sits within the Nailsea Farmed Coal Measures landscape character area, a remote, intimate, early mediæval pastoral landscape into which the urban edge protrudes. Area is considered to be of high sensitivity.	Policy 7.7 provides no specific mitigation beyond consideration of re-location / undergrounding of existing pylons. Assessments to identify areas with potential for mitigation may form part of the proposed sensitive green infrastructure strategy.
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	0	--	--	Development would be greenfield. Development on greenfield land does not contribute to promoting the conservation and wise use of land. Therefore all locations have a negative effect on this objective and there is no apparent scope for mitigation.	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	0	--	--	Potential for proposed development location to be very largely Grade 2. This land is also outside Flood Zone 3. Detailed surveys so far confirm predominantly BMV status.	Detailed Agricultural Land Classification Assessment required to establish the precise land grading in unsurveyed areas. However, grades 1, 2 and 3a appear to be so extensive in this location that avoiding them would not be possible.
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	0	++	++	Within Flood Zone 1. The town is surrounded by large areas of fluvial and tidal Flood Zone 3. These areas are also in the functional floodplain for the Land Yeo, River Kenn and surrounding tributaries and rhynes. Climate change will lead to slight enlargement of Flood Zone 3.	
4g. Minimise vulnerability to surface water flooding and other sources of flooding,	0	+/-	+/-	Extensive areas of surface water flood risk exist along the river corridors but are contained within the fluvial extents. So too are the inundation zones for the Barrow Tanks reservoirs. Localised	Surface water runoff should be carefully managed to avoid adverse downstream impacts. Important overlap

## Appendix C

without increasing flood risk elsewhere.				surface water flood risk along watercourses and elsewhere. Southern part susceptible to groundwater flooding.	with biodiversity issues as drainage affects aquatic environment (water levels and quality) of the Moors.
4h. Minimise harm to, and where possible improve, water quality and availability	0	?	?	There is a Groundwater Source Protection Zone for Chelvey spring that includes land S and W of Nailsea. There are no Drinking Water Safeguard Zones nearby.	Further engagement with regulators needed to understand what constraints or opportunities exist. The constraint is identified as 'subsurface activity only'.
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	0	++	++	Existing rail station (Nailsea & Backwell) but hardly any of the town is within 400m. Good bus links to Bristol via Backwell but poor connectivity to elsewhere. Lack of capacity on A370 corridor constrains improvements: Backwell crossroads is a particular constraint.	Policy 7.7 requires phasing in line with transport improvements. Scoring assumes delivery of these.
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	0	?	?	All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks. No locally specific issues. General issue of dispersed growth producing longer vehicle trips.	Large scale development provides an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved. JSP seeks investigation of zero carbon development.

**Sustainability Appraisal of the Joint Spatial Plan Publication Version**

DIAGRAM TO BE INSERTED

**Strategic Location:**

**Buckover Garden Village**

**Summary**

- The vision for Buckover Garden Village is to deliver a holistically planned, free standing garden village which enhances the natural environment and provides high-quality and innovative homes, with local jobs in a beautiful, healthy place with diverse communities and delivers step-change in local sustainable transport opportunities.
- Potential medieval settlement located between Horseshoe Farm and Milbury Heath. Roman Road runs east-west through northern part of strategic development location. Two Grade II Listed Buildings towards the centre of the locality. Also consider setting of Tortworth Court (II\*) and Eastwood Park.
- Development requires a package of local and strategic transport improvements.
- No known significant ecological constraints. Two geological SSSIs (Buckover Road Cutting and Brinkmarsh Quarry). SNCI at Ridgewood. Some landscape value on slopes to south and east of the locality. Limited flood risk.



## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	+	+	<b>BGV – Buckover</b> Currently agricultural land. Good potential access to the existing strategic cycle network through the Avon Cycleway. Potential to connect with the Jubilee Way and strategic PROW network. Potential to enhance the nearby cycle network and PROWs.	Strategic level of development with appropriate on-site provision would contribute to this objective. Policy 7.8 requires that a GI network be established to ensure a permanent and robust landscape edge to the western boundary of Buckover Garden Village. It also requires that new Local Plan policy will establish a designation to establish a permanent strategic gap between Buckover Garden Village and Thornbury is created and maintained. Transport mitigation will improve accessibility.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	+/?	+/?	<b>BGV – Buckover</b> There is no AQMA in the area. Potential for areas of poor air quality along the A38 and near to M5.	Transport Impact Assessment and adequate preventative and mitigation measures are required. Policy 7.8 requires that consideration will be required to ensure the A38 can continue to act as an effective relief road to the M5 without detriment to the new resident's health & wellbeing.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	-	-	<b>BGV – Buckover</b> There are no healthcare facilities in Buckover. The nearest GP practice, dental practice and pharmacy are located in Thornbury, outside of reasonable distance. The nearest hospital is outside of reasonable distance.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.8 has no specific requirements.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	<b>BGV – Buckover</b> This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy 7.8 states that around 3,000 dwellings, of which at least 1,500 will be delivered within the plan period.	

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society Within the West of England sub-region	0	++	++	<b>BGV – Buckover</b> No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy 7.8 states that affordable housing will be delivered.	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	0	+	+	<b>BGV – Buckover</b> There are no dedicated community centres, post offices or libraries in the area or within reasonable distance.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.8 requires the provision of and support for a range of retail, community & cultural facilities in the Garden Village and potentially other nearby communities to complement existing local provision.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	0	+	+	<b>BGV – Buckover</b> There are no schools in Buckover. The nearest primary and secondary school provision is within Thornbury, outside of reasonable distance.	Should strategic growth be proposed, work will be required to assess existing capacity in the context of projected requirements. Policy 7.8 requires the provision of a primary school and a 3-16 all through school and nursery(s).
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	0	-	-	<b>BGV – Buckover</b> Buckover is outside of reasonable distance to Bristol city centre. The nearest town centre is Thornbury, outside of reasonable distance. There are no local shops located within Buckover.	Policy 7.8 requires the provision of a strategic transport package, including a new local shuttlebus and cycle/ pedestrian improvements will improve access to Thornbury. The potential also exists for limited town centre services and facilities to be provided in small-scale retail units on site.

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	0	0	0	<b>BGV – Buckover</b> It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).	If development is to be used to benefit disadvantaged areas, the means to do this must be specified.
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the west of England sub-region	0	+	+	<b>BGV – Buckover</b> Very limited local employment opportunities at present. Likely that additional employment floor space would need to be provided at this location.	Strategic level of development with appropriate on-site provision would contribute to this objective. Policy 7.8 requires the provision of around 11ha of employment land to provide a range of employment opportunities. Potential also exists for the provision of local retail units, cultural and community facilities which will add to the local employment offer.
3b. Achieve reasonable access to major employment areas	0	-	-	<b>BGV – Buckover</b> No major employment area. Area is relatively close to employment opportunities in Thornbury.	Policy 7.8 requires a strategic transport package, including a new local shuttlebus and cycle/pedestrian improvements will improve access to Thornbury and links to major employment areas in the north fringe of Bristol.
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	0	?	?	<b>BGV – Buckover</b> Potential medieval settlement located between Horseshoe Farm and Milbury Heath. Roman Road runs east-west through northern part of strategic development location. There are two grade II Listed Buildings within the site, which have a collection of outbuildings (new and historic) that form their immediate curtilage. No other heritage assets fall within the zone but two listed farmhouses and a locally listed lodge lie to the north.	Impacts could largely be mitigated through provision of open space buffers around heritage assets. Developable areas are large enough do this without difficulty. Policy 7.8 requires a GI network be established to ensure that the setting of local heritage assets is protected.
4b. Minimise impact on and where possible enhance	0	?	?	<b>BGV – Buckover</b>	Impacts could largely be mitigated through provision of

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
habitats and species (taking account of climate change)				There are two geological SSSIs within the area. Buckover Road Cutting SSSI consists of rock exposures either side of the A38 immediately north of the junction with the Old Gloucester Road. Brinkmarsh Quarry SSSI is situated in the far north of the eastern half of the SDL and is notified for its fossil-rich shales and sandy limestones. Ridgewood near the hamlet of Buckover in the eastern half of the SDL is designated as an SNCI for its ancient semi-natural woodland.	open space buffers around ecological assets. Developable areas are large enough do this without difficulty. Policy 7.8 requires a GI network be established to ensure that Ridgewood and other local ecological assets are protected.
4c. Minimise impact on and where appropriate enhance valued landscapes	0	-	-	<b>BGV – Buckover</b> Buckover is not in or near the Cotswolds AONB. Buckover is located in the Falfield Vale landscape character area and including the side slopes of the Severn Ridge at Milbury Heath which overlook the area from the south. The bowl shaped landscape is overlooked from the higher ground to the north where the medieval deer park of Eastwood Park has a parkland character. The landscape in this area is considered to be of high and medium to high sensitivity.	
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	0	--	--	<b>BGV – Buckover</b> Development would be greenfield. Development on greenfield land does not contribute to promoting the conservation and wise use of land. Therefore all locations have a negative effect on this objective and there is no apparent scope for mitigation.	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	0	--	--	<b>BGV – Buckover</b> Buckover contains areas of potential Grades 2 and 3 agricultural land. There are small areas of Flood Zone 3 around the river corridors.	Detailed Agricultural Land Classification (ALC) Assessment required to establish the precise land grading. Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	0	++	++	<b>BGV – Buckover</b> Majority of this location is within a low risk flood zone (FZ1). A small part of this location, along the Pickedmoor Brook, is within a high risk flood zone (FZ2 and FZ3).	New residential development should not take place in high-risk areas if areas with a lower risk of flooding are reasonably available. The functional floodplain is to be avoided altogether.

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	0	+/-	+/-	<b>BGV – Buckover</b> The site is at risk of surface water flooding in 1 in 30, 1 in 100 and 1 in 1000 year events. Surface water flow routes along river corridors. Small areas of surface water pooling across site.	Surface water runoff should be carefully managed to avoid adverse downstream impacts.
4h. Minimise harm to, and where possible improve, water quality and availability	0	0	0	<b>BGV – Buckover</b> There are no Groundwater Source Protection Zones nearby. There are no Drinking Water Safeguard Zones nearby.	
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	0	-	-	<b>BGV – Buckover</b> Limited access to bus-based public transport network at present. There is at present no nearby access to the rail network.	Policy 7.8 requires provision of a strategic transport package including as appropriate delivery of or contributions towards: Metrobus Extension to Thornbury & Buckover GV, A38(N) Park & Ride, M5 J14 improvements, Charfield Rail Station re-opening, local bus service improvements (including new local shuttlebus to Thornbury), strategic and local cycle and pedestrian connections to Thornbury and other local highway network improvements as necessary.
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	0	+	+	<b>BGV – Buckover</b> All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks. No locally specific issues. General issue of dispersed growth producing longer vehicle trips.	Policy 7.8 requires the embedding of zero-carbon and energy positive solutions throughout the planning, design and delivery process across the whole settlement. Large scale development provides an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved.

**Sustainability Appraisal of the Joint Spatial Plan Publication Version**

DIAGRAM TO BE INSERTED

**Strategic Location:**

**Charfield**

**Summary**

- To the south of Charfield the small hamlet of Churchend contains the Grade I listed Church of St James, the Grade II listed Rectory Manor Cottages and other locally listed buildings. LBs also at Poolfield Farm and Park Farm.
- Development requires a package of local and strategic transport improvements.
- Escarpment, slopes and wooded areas through the west and northwest of the village and Elbury Hill to the east have landscape value. Flood risk limited to the Little Avon running along the Stroud District boundary to the east.
- Tortworth Copse is a designated SNCI and Cullimore’s Quarry is both a geological SSSI and Regionally Important Geological Site (RIGS). Some associated ecological value to northwest of the village, along the Little Avon River and SNCI’s to the south.

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	+	+	<b>Charfield</b> The main open space provision is currently located centrally in the village. Potential to enhance the currently limited local cycle and Public Rights Of Way network.	Strategic level of development with appropriate on-site provision would contribute to this objective. Policy 7.9 requires that the future role and function of remaining greenfield land parcels within the centre of the village will firstly be reviewed in consultation with the local community to ensure future uses make the most efficient use of land. It also requires that a GI network enhances and protects existing assets.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	+	+	<b>Charfield</b> No local AQMAs. Rural area. SDL areas bisected by Bristol to Gloucester railway line and B4058.	Transport Impact Assessment and adequate preventative and mitigation measures are required.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	-	-	<b>Charfield</b> There are no health care facilities in Charfield. The nearest healthcare facilities are located within Thornbury, outside of reasonable distance. There are also healthcare facilities in Yate, to the south. The nearest hospital is located in Southmead.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.9 has no specific requirements.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	<b>Charfield</b> This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy 7.9 states that around 1,200 dwellings will be delivered within the plan period.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	0	++	++	<b>Charfield</b> No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy 7.9 states that affordable housing will be delivered.	
2c. Achieve reasonable access to community	0	+	+	<b>Charfield</b> There is a dedicated community centre and a post office located within Charfield. There is no library in Charfield. The majority of the SDL to the	Should strategic growth be proposed, work will be required to assess projected

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
facilities (post office, meeting venues, youth centres)				west of the railway line is within reasonable distance of the post office, but nearly all of the area to the east is not, The majority of the SDL to the east of the railway line and around half of the area to the west is within reasonable distance of the community centre.	requirements. Policy 7.9 requires that the future role and function of existing community assets within the centre of the village will firstly be reviewed in consultation with the local community to ensure future uses make the most efficient use of land.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	0	++/-	++/-	<b>Charfield</b> Majority of the area is within reasonable distance of the primary school in Charfield. The nearest secondary school is Katherine Lady Berkeley, outside of a reasonable distance to the east. There is also secondary school provision in Thornbury to the west and Yate to the south.	Should strategic growth be proposed, work will be required to assess existing capacity in the context of projected requirements. Policy 7.9 requires the replacement of the existing primary school with a new 3FE school in a central village location and contributions to delivery of an expanded secondary school in the locality, and/or the delivery of a new all through 3-16 school at Buckover Garden Village.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	0	-	-	<b>Charfield</b> Charfield is outside of reasonable distance to Bristol city centre. The nearest town centre is Thornbury, outside of reasonable distance, over 5km to the west, where there is a good range of town centre services and facilities. There is also a good range of town centre services and facilities in Yate, to the south. There are local shops located within Charfield.	Policy 7.9 requires a strategic transport package including: M5 J14 improvements, Charfield Rail Station re-opening, local bus service enhancements – increasing access to Thornbury/Yate.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	0	0	0	<b>Charfield</b> It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).	If development is to be used to benefit disadvantaged areas, the means to do this must be specified.
3a. Deliver a reasonable quantum of employment floorspace/land and increase	0	+	+	<b>Charfield</b> Charfield does not have undeveloped employment land provision. Limited employment development potential within area.	Policy 7.9 requires the provision of a minimum of 5ha of employment land for B-Use



## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
access to work opportunities for all parts of society within the West of England sub-region					Classes and a range of non B-Use Class employment opportunities. Potential also exists for new and/or improved retail and community facilities which will add to the local employment offer.
3b. Achieve reasonable access to major employment areas	0	-	-	<b>Charfield</b> There is a safeguarded employment site in the village. A large employer (Renishaw), based in Stroud DC, has premises on the edge of the settlement. Further towards Wotton-Under-Edge is Renishaw's headquarters.	Policy 7.9 requires a strategic transport package including: M5 J14 improvements, Charfield Rail Station re-opening, local bus service enhancement to improve access to employment in Yate and the Bristol north fringe.
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	0	?	?	<b>Charfield</b> A number of prominent Listed Buildings are located around the periphery of the village, including a Grade I listed church at Churchend. There is also some archaeological potential but not sufficient to prevent development.	Policy 7.9 requires that a GI network will enhance and protect listed buildings. Investigation of archaeological interest may be required.
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	0	?	?	<b>Charfield</b> There is a SSSI and a number of SNCIs in/near the parts of the SDL to the west of the railway line. There are no formal ecological constraints in the parts of the SDL to the east of the railway line. In some cases, further work may be required to determine their value.	Policy 7.9 requires that a GI network will enhance and protect local ecological assets.
4c. Minimise impact on and where appropriate enhance valued landscapes	0	-	-	<b>Charfield</b> Charfield is not in or near the Cotswolds AONB. Charfield is within the Wickwar Ridge and Vale landscape character area, a diverse undulating landscape coverer with a mix of farmland, woodland and common. The landscapes in this SDL are considered to be of high and medium to high sensitivity.	Policy 7.9 requires that a GI network will enhance and protect areas of local landscape importance such as Elbury Hill and the Little Avon river and flood zone.
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	0	--	--	<b>Charfield</b> Development would be greenfield. Development on greenfield land does not contribute to promoting the conservation and wise use of land. Therefore all locations have a negative effect on this objective and there is no apparent scope for mitigation.	

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	0	?/-	?/-	<b>Charfield</b> The majority of Charfield is surrounded by potential Grade 3 agricultural land, although there are small areas of potential Grade 2 land to the east of the railway line. The majority of the SDL area is outside of Flood Zone 3.	Detailed Agricultural Land Classification (ALC) Assessment required to establish the precise land grading. Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a). Policy 7.9 requires that areas of high flood risk along the Little Avon River will form an important part of the GI network.
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	0	+	+	<b>Charfield</b> Majority of this location is within a low risk flood zone (FZ1). The Little Avon River is located on the eastern side of the railway line. Areas adjacent to the river are in a high risk flood zone (FZ2 and FZ3).	Policy 7.9 requires that the Little Avon River and its flood zone will form part of a GI network.
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	0	+/-	+/-	<b>Charfield</b> The location is at risk of surface water flooding in 1 in 30, 1 in 100 and 1 in 1000 year events.	New development will need to provide Sustainable Urban Drainage systems. Surface water runoff should be carefully managed to avoid adverse downstream impacts.
4h. Minimise harm to, and where possible improve, water quality and availability	0	0	0	<b>Charfield</b> There are no Groundwater Source Protection Zones nearby. There are no Drinking Water Safeguard Zones nearby.	
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	0	-	-	<b>Charfield</b> There is an hourly bus service operating between Wotton-under-Edge and Yate. The majority of the area is within reasonable distance of a bus stop. Land is safeguarded in order that a station service can be reinstated in future at Charfield. The potential for this to happen has been studied and could be viable, depending on the scale of development proposed and the provision of new train services between Bristol, Yate and Gloucester via MetroWest Phase 2.	Policy 7.9 requires a strategic transport package including: M5 J14 improvements, Charfield Rail Station re-opening, local bus services, a comprehensive Wotton Road environmental enhancement scheme, new and improved foot and cycle connections through the village and to key local destinations.

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	0	?	?	<p><b>Charfield</b></p> <p>All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks.</p> <p>No locally specific issues. General issue of dispersed growth producing longer vehicle trips.</p>	Large scale development provides an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved. Policy 7.8 has no specific requirements.

**Sustainability Appraisal of the Joint Spatial Plan Publication Version**

DIAGRAM TO BE INSERTED

**Strategic Location:**

**Coalpit Heath**

**Summary**

- Historic coalmining across the site.
- Good proximity to employment opportunities and other services in the North & North East Bristol Fringe, and Yate rail station.
- Development requires a package of local and strategic transport improvements.
- Development requires sensitive response to building on ridgeline.
- Setting of Listed Buildings and historic Dramway will require careful consideration.

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	+	+	<b>Coalpit Heath</b> There are a range of PRowS and cycle routes travel through the village. There is range of open space provision. Potential to enhance the current cycle network and PRowS, with cycle network traveling through this area. The main playing field for Coalpit Heath is close by (<400m, in some parts). A suitable scale of development with appropriate on-site provision will contribute to this objective.	A strategic level of development with appropriate on-site provision will contribute to this objective. Policy 7.10 requires a GI network to reinforce a new Green Belt boundary the rail cutting, provide attractive routes through the site to the nearby countryside (including along the historic Dramway), break up development impact along the ridgeline and protect the setting of nearby Listed Buildings.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	+	+	<b>Coalpit Heath</b> No local AQMAs. Air quality likely to vary among development areas. There are no major traffic routes in proximity to the SDL. No closer to A432 than existing development.	
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	+	+	<b>Coalpit Heath</b> There is a range of healthcare facilities and services (GP surgeries, dental practices and pharmacies) distributed throughout Winterbourne, Frampton Cotterell and Coalpit Heath. The SDL is within reasonable distance of the GP surgery in Frampton Cotterell, but is outside of reasonable distance of a dental practice, an optician and a pharmacy. The nearest hospital is outside of reasonable distance.	Policy 7.10 has no specific requirements.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	<b>Coalpit Heath</b> This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy 7.10 states that around 1,800 dwellings will be delivered within the plan period.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	0	++	++	<b>Coalpit Heath</b> No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy 7.10 states that affordable housing will be delivered.	

## Appendix C

2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	0	+/?	+/?	<p><b>Coalpit Heath</b> There are six dedicated community centres distributed between Winterbourne, Frampton Cotterell and Coalpit Heath. There are post offices in Winterbourne and Coalpit Heath. Around half of the SDL area is within reasonable distance of a dedicated community centre. Less than half of the SDL area is within reasonable distance of a post office.</p>	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.10 requires the provision of a new community facility/hub.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	0	+/-	+/-	<p><b>Coalpit Heath</b> There are six primary schools distributed between Winterbourne, Frampton Cotterell and Coalpit Heath. There is one secondary school in the area, although there are also secondary schools in Yate. Access to primary schools is good for all assessment areas. Over half of the SDL area is within reasonable distance of a primary school. The SDL area is outside of reasonable distance of a secondary school.</p>	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.10 requires the provision of a new primary school (subject to further testing) plus contributions to a new or expanded secondary school in the wider locality.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	0	-	-	<p><b>Coalpit Heath</b> Coalpit Heath is outside of reasonable distance to Bristol City centre. The nearest town centres are outside of reasonable distance, located within the north and east fringes of Bristol and Yate. Winterbourne has a local centre and offers some services and facilities. There are also a number of local shops distributed around the Winterbourne, Frampton Cotterell and Coalpit Heath area. As a result, most areas are near a local shop.</p>	Policy 7.10 requires the development to provide or contribute to a strategic transport package including: Metrobus extension to Yate and Chipping Sodbury, A432 Park and Ride, Yate Station enhancement, the Winterbourne and Frampton Cotterell Bypass, strategic cycle route and local bus services – increasing access to Yate.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	0	0	0	<p><b>Coalpit Heath</b> It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).</p>	If development is to be used to benefit disadvantaged areas, the means to do this must be specified.

## Appendix C

<p>3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region</p>	0	+	+	<p><b>Coalpit Heath</b>            Limited local employment opportunities, although area is located close to employment opportunities at Yate, Emersons Green (EA). Given close proximity to existing employment opportunities it is unlikely that additional employment floor space would be provided at this location</p>	<p>Policy 7.10 requires the provision of a minimum of 5ha of employment land for B-Use Classes and a range of non B-Use Class employment opportunities as well as a local centre incorporating a local retail outlet.</p>
<p>3b. Achieve reasonable access to major employment areas  <i>Major Employment sites</i>            Enterprise Zones            Locally designated key employment areas</p>	0	+	+	<p><b>Coalpit Heath</b>            There is little in the way of an employment base beyond local shops and services. Areas to the west lie close to Enterprise Area at Emersons Green. Areas to the west lie relatively close to the North Bristol Fringe.</p>	<p>Policy 7.10 requires the development to provide or contribute to a strategic transport package including: Metrobus extension to Yate and Chipping Sodbury, A432 Park and Ride, Yate Station enhancement, the Winterbourne and Frampton Cotterell Bypass, strategic cycle route and local bus services.</p>
<p>4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings</p>	0	?	?	<p><b>Coalpit Heath</b>            The area lies in an historic landscape with numerous heritage assets and significant archaeological potential associated with medieval settlement, the civil war and mining history. Significant archaeological potential associated with a medieval settlement and Frog Lane colliery to northeast of the area. Mayshill Farm sits on a prominent location overlooking north-eastern part of the area. Listed Farmhouse overlooks southern part of the area.</p>	<p>Policy 7.10 requires a GI network to provide attractive routes through the site to the nearby countryside (including along the historic Dramway) protect the setting of Listed Buildings Elsewhere investigation of archaeological potential required.</p>
<p>4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)</p>	0	0	0	<p><b>Coalpit Heath</b>            There are no significant ecological constraints within the SDL area, although the south eastern boundary abuts an SNCI.</p>	<p>Policy 7.10 requires a GI network, of which the SNCI will be part and which will protect and enhance the nature conservation interest.</p>

## Appendix C

4c. Minimise impact on and where appropriate enhance valued landscapes <i>National designations</i> AONB	0	-	-	<b>Coalpit Heath</b> The area is within the Frome Valley character area, a diverse, enclosed, intricate combination of agriculture and settlement, divided by major roads. Within this area, there are landforms that make a significant contribution to the distinctive character of the locality and to the rural setting of the surrounding existing residential development. The landscape in this area is considered to be of medium to high sensitivity.	
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	--	--	--	<b>Coalpit Heath</b> Development would be on greenfield land. There are no opportunities for strategic-level development on brownfield land.	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	0	?/+	?/+	<b>Coalpit Heath</b> The majority of the SDL is potential Grade 3 agricultural land, although there are small areas of potential Grades 4 and 7. The majority of the SDL area is outside of Flood Zone 3.	Detailed Agricultural Land Classification (ALC) Assessment required to establish the precise land grading. Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	0	+	+	<b>Coalpit Heath</b> No main rivers in SDL area. Tubbs Bottom Watercourse becomes main river downstream of Badminton Road. Area is in a low risk flood zone (FZ1).	
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	0	+/-	+/-	<b>Coalpit Heath</b> The site is at risk of surface water flooding in 1 in 30, 1 in 100 and 1 in 1000 year events. Surface water flow routes along river corridor; south to north in north of area; and west to east in south of area. Large areas of surface water pooling on north west boundary near bridge and along north boundary. Small areas of surface water pooling across area. Approx. 10% of area is within a zone where there is limited potential for groundwater to occur.	Surface water runoff should be carefully managed to avoid adverse downstream impacts.
4h. Minimise harm to, and where possible improve, water quality and availability	0	0	0	<b>Coalpit Heath</b> There are no Groundwater Source Protection Zones nearby. There are no Drinking Water Safeguard Zones nearby.	



## Appendix C

5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	0	+	+	<p><b>Coalpit Heath</b>            The Yate – Bristol bus services run along the A432 (47/X47, half-hourly) and B4058/Church Road (46/X46, 81/82, each hourly). The nearest train stations are Yate and Bristol Parkway (4 to 5km away) - all of the area is outside of reasonable distance of a secondary school.</p>	Policy 7.10 requires that development will provide or contribute to a strategic transport package including: Metrobus extension to Yate and Chipping Sodbury, A432 Park and Ride, Yate Station enhancement, the Winterbourne and Frampton Cotterell Bypass, strategic cycle route and local bus services.
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	0	?	?	<p><b>Coalpit Heath</b>            No locally specific issues. General issue of dispersed growth producing longer vehicle trips.</p>	Large scale development will provide an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved.

**Sustainability Appraisal of the Joint Spatial Plan Publication Version**

DIAGRAM TO BE INSERTED

**Strategic Location:**

**Thornbury**

**Summary**

- Development requires a package of local and strategic transport improvements.
- Scarp slope running from north east to south west around the eastern edge of the town and around the southern end of the town is a significant physical constraint to development. Development will be contained within this landscape feature.
- Some ecological constraints including SNCI and ancient woodland in the area.
- Flood risk along river corridors at Crossways.

## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	+	+	<b>Thornbury</b> Currently agricultural land. There are a range of PRoWs and cycle routes travelling through the town. There is range of open space provisions with further planned through already determined planning permissions.	A strategic level of development with appropriate on-site provision will contribute to this objective. Policy 7.11 requires that a Green Infrastructure network that will protect Crossways & Cleve Wood, the setting of Hacket Farm, rural nature of Hacket Lane, Clay Lane & Crossways Lane, include SUDs features at Crossways to manage potential flooding at Crossways, and extend the Picked Brook Rhine streamside walk.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	+	+	<b>Thornbury</b> No AQMAs in locality and no existing air quality issues from major traffic routes. Future air quality will be affected by extent of development.	
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	+	+	<b>Thornbury</b> There is a range of healthcare facilities and services (GP surgeries, dental practices and pharmacies) in Thornbury as one of South Gloucestershire's market towns. The majority of these services are located in the town centre, in the west of Thornbury. There is also a hospital which offers mainly outpatient facilities. The residential area to the north is within reasonable distance of a GP surgery and health centre. Around a quarter of the residential area to the east is within reasonable distance of a GP surgery and health centre. Both residential areas are outside of reasonable distance to a dental practice, optician and the majority of both areas area also outside of reasonable distance to a pharmacy. The nearest hospital is outside of reasonable distance.	A strategic level of development with appropriate on-site provision will contribute to this objective. Policy 7.11 has no specific requirements.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	<b>Thornbury</b> This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy 7.11 states that a maximum of 500 dwellings will be delivered within the plan period.	

## Appendix C

2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	0	++	++	<p><b>Thornbury</b> No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy 7.11 states that affordable housing will be delivered.</p>	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	0	-/?	-/?	<p><b>Thornbury</b> There are three dedicated community centres, all of which are located on the west side of the town. There are three post offices in and around Thornbury. The SDL areas are outside of reasonable distance from the dedicated community centres and post offices in Thornbury.</p>	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.11 requires development to incorporate a new convenience store/retail or community opportunity.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	0	+	+	<p><b>Thornbury</b> There are six primary schools in Thornbury and one secondary school (Castle). Castle school is located on the opposite end of Thornbury to areas T3 and T4. Marlwood School is the next nearest school, located in Alveston. Around two thirds of the SDL residential areas are located within reasonable distance of one of Thornbury's primary schools. The residential area to the north is within reasonable distance of a secondary school, but the residential area to the west is not.</p>	Should strategic growth be proposed, work will be required to assess existing capacity in the context of projected requirements. Policy 7.11 requires the new development to contribute towards new school places.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	0	+	+	<p><b>Thornbury</b> Thornbury is outside of reasonable distance to Bristol City centre. As a market town, there is a good range of services and facilities in Thornbury town centre. There are also some limited services and facilities in small parades around the town. The vast majority of the SDL area is within reasonable distance of Thornbury town centre.</p>	Policy 7.11 requires development to incorporate a new convenience store/retail or community opportunity.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	0	0	0	<p><b>Thornbury</b> It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England.</p>	If development is to be used to benefit disadvantaged areas, the means to do this must be specified.

## Appendix C

3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region	0	++	++	<p><b>Thornbury</b> Thornbury has a range of employment opportunities. It does not have extensive undeveloped employment land provision but does have good access to the strategic road network.</p>	Policy 7.11 requires the provision of around 5ha of employment land and a new retail store to provide a range of employment opportunities.
3b. Achieve reasonable access to major employment areas <i>Major Employment sites</i> Enterprise Zones Locally designated key employment areas	0	+	+	<p><b>Thornbury</b> Employment opportunities within the town are mainly located at Midland Way Business Park (safeguarded employment site) and within the service sector in the town centre. Reasonable access (via A38) to Bristol North Fringe for other employment opportunities (EA).</p>	Policy 7.11 requires the development to provide contributions towards local and strategic transportation schemes, including potentially: Metrobus Extension to Thornbury (& Buckover) GV, A38(N) Park & Ride, M5 J14 improvements, Charfield Rail Station re-opening, local bus service improvements, local highway, foot and cycle improvements.
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	0	?	?	<p><b>Thornbury</b> The north, and eastern side of Thornbury contains a number of Listed Buildings and some archaeological potential. There are Listed Buildings located just outside of the SDL areas and some potential for archaeology of considerable value.</p>	Policy 7.11 requires a GI network that will protect among other things the setting of Hacket Farm, as well as the rural nature of Hacket Lane, Clay Lane & Crossways Lane. Elsewhere archaeological investigation is required.
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	0	?	?	<p><b>Thornbury</b> There are no significant ecological constraints within the residential area to the north. The area to the east contains/ is adjacent to the Crossways Wood and Cleeve Wood SNCIs, which are designated for their ancient semi-natural woodland.</p>	Policy 7.11 requires that a GI network will protect both Crossways Wood and Cleeve Wood.
4c. Minimise impact on and where appropriate enhance valued landscapes	0	--/-	--/-	<p><b>Thornbury</b> Thornbury is not in or near the Cotswold AONB. It is located within the Severn Ridges, a complex landform of abrupt scarps and gentle ridges, which rise from the Severn levels. The landscapes in the SDL areas are considered to be of high sensitivity and medium to high/ high sensitivity.</p>	Policy 7.11 requires that a GI network will protect important landscape features, including the rural nature of Hacket Lane, Clay Lane and Crossway Lane.

## Appendix C

4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	0	--	--	<b>Thornbury</b> Development would be on greenfield land. There are no opportunities for strategic-level development on brownfield land.	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	0	--	--	<b>Thornbury</b> There are large areas of potential Grade 2 agricultural land surrounding parts of Thornbury. The majority of the SDL area is potential Grade 2 agricultural land, with a small area of potential Grade 3 land at the southernmost extent of the residential area to the east of Thornbury. The vast majority of the SDL area is outside of Flood Zone 3.	Detailed Agricultural Land Classification (ALC) Assessment required to establish the precise land grading. Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	0	+	+	<b>Thornbury</b> There are no main rivers in the SDL area. The vast majority of the SDL area is in a low risk flood zone (FZ1). In the residential area to the west, Pickedmoor Brook river corridor is in high risk flood zone (FZ2 and FZ3).	New residential development should not take place in this location if areas with a lower risk of flooding are reasonably available. The functional floodplain is to be avoided altogether.
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	0	+/-	+/-	<b>Thornbury</b> The area is at risk of surface water flooding in 1 in 30, 1 in 100 and 1 in 1000 year events. Surface water flow routes east to west in south of northern part of SDL area. Small area of surface water pooling in south of SDL area. Majority of area is within a zone where there is limited potential for groundwater to occur. In the eastern part of the SDL, surface water flow routes along river corridors, with small areas of surface water pooling across SDL. Part of area is within a zone where there is limited potential for groundwater to occur.	Policy 7.11 requires development to include SUDs features to manage potential flooding.
4h. Minimise harm to, and where possible improve, water quality and availability	0	0	0	<b>Thornbury</b> There are no Groundwater Source Protection Zones nearby. There are no Drinking Water Safeguard Zones nearby.	

## Appendix C

5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	0	+	+	<p><b>Thornbury</b> There is a half-hourly bus service (77/78/79) operating between Bristol and Thornbury which runs along the A38, although journey times to Bristol are lengthy at AM and PM peak. The nearest railway stations are Parkway and Pilning/Severn Beach, all of which are outside of reasonable distance.</p>	Policy 7.11 requires the development to provide contributions towards local and strategic transportation schemes, including potentially: Metrobus Extension to Thornbury (& Buckover) GV, A38(N) Park & Ride, M5 J14 improvements, Charfield Rail Station re-opening, local bus service improvements, local highway, foot and cycle improvements.
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	0	?	?	<p><b>Thornbury</b> No locally specific issues. General issue of dispersed growth producing longer vehicle trips.</p>	Large scale development will provide an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved.

**Sustainability Appraisal of the Joint Spatial Plan Publication Version**

DIAGRAM TO BE INSERTED

**Strategic Location:**

**Northwest and West Yate**

**Summary**

- There are Listed Buildings and some archaeological potential across the SDL area.
- Yate has good access to employment areas in the north & northeast Bristol Fringe and a main line rail station. Development requires a package of local and strategic transport improvements.
- Flood risk and some ecological interest along Frome valley and tributaries.



## Appendix C

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	+	+	<b>Northwest and West Yate</b> There are a range of PRowWs, cycle routes and playing fields and nature reserves. Potential exists to enhance the current cycle network and PRowWs, with the Avon cycleway travelling through this area.	Strategic level of development with appropriate on-site provision would contribute to this objective. Policy 7.12 requires that a GI network will reinforce a new Green Belt boundary, protect the river valley and provide an attractive segregated route along the Frome Valley Walkway, and enhance North Road and Frome river corridor through the Beeches Estate. Transport mitigation will improve accessibility.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	+/?	+/?	<b>Northwest and West Yate</b> No local AQMA although known areas of poor air quality in Yate. Railway line in the south and A432 bisecting the north of the area. Potentially some localised air quality issues. Future air quality may be affected by extent of development.	Transport Impact Assessment and adequate preventative and mitigation measures are required.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	+	+	<b>Northwest and West Yate</b> There is a range of healthcare facilities and services (GP surgeries, dental practices and pharmacies) in Yate and Chipping Sodbury. The majority of these services are located in the town's centres. The majority of the SDL, including the area where residential development is likely to be focused, is outside of reasonable distance from an existing GP surgery, dental practice and pharmacy. Notwithstanding this, there will be a GP surgery delivered within the North Yate New Neighbourhood. All of the SDL area is outside of reasonable distance from an optician. The nearest hospital is outside of reasonable distance.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.12 has no specific requirements.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	<b>Northwest and West Yate</b> This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy 7.12 states that a minimum of 1,900 dwellings will be delivered, of which at least 1,000 will be delivered within the plan period.	

## Appendix C

2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	0	++	++	<p><b>Northwest and West Yate</b> No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy 7.12 states that affordable housing will be delivered.</p>	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	0	+	+	<p><b>Northwest and West Yate</b> There are seven dedicated community centres, five post offices and two libraries distributed between Yate and Chipping Sodbury. The majority of the SDL, including the area where residential development is likely to be focused, is outside of reasonable distance from a dedicated community centre. All the SDL is outside of reasonable distance from a post office. Notwithstanding this, there will be a multi-use local centre comprising community meeting delivered within the North Yate New Neighbourhood.</p>	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.12 requires that the residential neighbourhood will contain a new local centre including a community facility/hub.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	0	+/-	+/-	<p><b>Northwest and West Yate</b> There are thirteen primary schools in the Yate and Chipping Sodbury area. There are three secondary schools (Brimsham Green, Yate International Academy and Chipping Sodbury) in the Yate and Chipping Sodbury area. Around half of the the area where residential development is likely to be focused is within reasonable distance of a primary school. In addition to this this, there will be additional primary school delivered within the North Yate New Neighbourhood. Around a third of the the area where residential development is likely to be focused is within reasonable distance of a secondary school.</p>	Should strategic growth be proposed, work will be required to assess existing capacity in the context of projected requirements. Policy 7.12 requires that the residential neighbourhood will contain a new local centre including a primary school(s) and/or all through 3-16 school.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	0	+	+	<p><b>Northwest and West Yate</b> Yate is outside of reasonable distance to Bristol City centre. As a market town, there is a good range of town centre services and facilities in Yate and nearby Chipping Sodbury. There are also some limited services and facilities in small parades around the town. The majority of the SDL area is within reasonable distance of Yate town centre. That said, the railway line presents a physical barrier to accessing it from the employment areas to the south (in west Yate).</p>	Policy 7.12 states that an on-site rail crossing and a new rail bridge are also likely to be required across Nibley Lane. The '?' score reflects that this infrastructure is not a full policy requirement as yet.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	0	0	0	<p><b>Northwest and West Yate</b> It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).</p>	If development is to be used to benefit disadvantaged areas, the means to do this must be specified.

## Appendix C

<p>3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region</p>	<p>0</p>	<p>++</p>	<p>++</p>	<p><b>Northwest and West Yate</b> Yate and Chipping Sodbury does not have extensive undeveloped employment land provision, and has good access to the strategic road network due to proximity to M4 and M5.</p>	<p>Policy 7.12 provides a significant new employment land allocation totalling approx. 30ha will be allocated at West Yate, of which, approximately 11ha of land south of Badminton Road will be allocated for B1 and B2 office/light industrial and research use; and 19ha of land between the railway tracks off the Westerleigh Road will be allocated for B2/B8 and similar uses. Potential also exists for the provision of non B-use class employment at an appropriate location which will add to the local employment offer.</p>
<p>3b. Achieve reasonable access to major employment areas</p>	<p>0</p>	<p>+</p>	<p>+</p>	<p><b>Northwest and West Yate</b> Variety of employment opportunities in Yate and Chipping Sodbury. Significant (safeguarded) industrial and trading estates are largely located at the western edge of Yate, close to the station.</p>	<p>Policy 7.12 requires the development to provide or contribute to a strategic transport package including: Metrobus extension to Yate and Chipping Sodbury, A432 Park and Ride, a strategic cycle route, Yate Station enhancement, Winterbourne and Frampton Cotterell Bypass and local bus services.</p>
<p>4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings</p>	<p>0</p>	<p>-/?</p>	<p>-/?</p>	<p><b>Northwest and West Yate</b> There are Listed Buildings and potential for archaeology associated with this historic landscape all around the periphery of Yate. There are a number of Listed Buildings within the SDL area. Some archaeological potential across the SDL area, particularly associated with Nibley village and former Mayshill colliery, and areas in proximity to Acton Court SAM and Iron Acton village.</p>	<p>Investigation of archaeology and consideration of Listed Buildings required. Policy 7.12 has no specific requirements.</p>

## Appendix C

4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	0	?	?	<p><b>Northwest and West Yate</b> The River Frome forms part of the boundary of the SDL area, and is designated as an SNCI for its open flowing water and bankside vegetation. Fields at Mission Road/North Road – are also designated as an SNCI, again for their species-rich neutral grassland interest.</p>	Policy 7.12 requires that a GI network will reinforce a new Green Belt boundary, protect the river valley and provide an attractive segregated route along the Frome Valley Walkway, and enhance North Road and Frome river corridor through the Beeches Estate.
4c. Minimise impact on and where appropriate enhance valued landscapes	0	-/-	-/-	<p><b>Northwest and West Yate</b> The SDL area is not located in the Cotswold AONB. The majority of Yate is within the Wickwar Ridge and Vale landscape character area, a diverse undulating landscape coverer with a mix of farmland, woodland and common. The landscape in this area is considered to be of medium to high/ high sensitivity.</p>	
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	0	--	--	<p><b>Northwest and West Yate</b> Development would be greenfield. Development on greenfield land does not contribute to promoting the conservation and wise use of land. Therefore all locations have a negative effect on this objective and there is no apparent scope for mitigation.</p>	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	0	?/+	?/+	<p><b>Northwest and West Yate</b> The area surrounding Yate and Chipping Sodbury contains areas of potential Grades 1, 2, 3 and 4 agricultural land. The majority of the SDL area is made up of potential Grade 3 agricultural land. There is however an area of potential Grade 2 land in West Yate, and a swathe of potential Grade 4 to the south. The area is outside of Flood Zone 3.</p>	Detailed Agricultural Land Classification (ALC) Assessment required to establish the precise land grading. Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).
4f. Minimise vulnerability to tidal/fluviial flooding (taking account of climate change), without increasing flood risk elsewhere.	0	+/-	+/-	<p><b>Northwest and West Yate</b> The majority of the SDL area is in a low risk flood zone (FZ1). There are however areas of high flood risk (FZ2 and FZ3) along the river corridors.</p>	New residential development should not take place in this location if areas with a lower risk of flooding are reasonably available. The functional floodplain is to be avoided altogether.

## Appendix C

4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	0	+/-	+/-	<b>Northwest and West Yate</b> The area is at risk of surface water flooding in 1 in 30, 1 in 100 and 1 in 1000 year events. Surface water flow routes along river corridors, with areas of surface water pooling across the SDL area. Along river corridor there is potential for groundwater flooding to occur at surface. Parts of the area are within a zone where there is limited potential for groundwater to occur.	New development will need to provide Sustainable Urban Drainage systems. Surface water runoff should be carefully managed to avoid adverse downstream impacts.
4h. Minimise harm to, and where possible improve, water quality and availability	0	0	0	<b>Northwest and West Yate</b> There are no Groundwater Source Protection Zones nearby. There are no Drinking Water Safeguard Zones nearby.	
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	0	+	+	<b>Northwest and West Yate</b> There are regular bus services between Yate and Bristol, although the quality of local bus services is variable, with services to/from Bristol being caught in traffic congestion. Yate Station is at the western edge of Yate and is served by 1-train per hour (a local service running between Malvern/Gloucester, Bristol and the South Coast). MetroWest Phase 2 will double the frequency of services from 2021; this improvement would use up the remaining capacity on the network at Westerleigh Junction.	Policy 7.12 requires the development to provide or contribute to a strategic transport package including: Metrobus extension to Yate and Chipping Sodbury, strategic cycle route A432 Park and Ride, Yate Rail Station enhancement, Winterbourne and Frampton Cotterell Bypass and local bus services.
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	0	0	0	<b>Northwest and West Yate</b> All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks. No locally specific issues. General issue of dispersed growth producing longer vehicle trips.	Large scale development provides an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved.

## Appendix C

### APPENDIX E: Legal compliance checklist

Source	Requirements for an environmental report	Where covered in the SA Report	Notes
References to Regulations and to Schedule 2 are to the 2004 SEA Regulations	<p>Prepare an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated.</p> <p>Provide the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment</p>	The whole report does this.	
Regs. 8, 13	Consultation bodies with environmental responsibilities and the public to be given an effective opportunity to express their opinion on	Not applicable to the content of the report	Environmental bodies and the public will be given 7 weeks to

## Appendix C

	the draft plan or programme and the accompanying environmental report before the plan or programme is adopted		comment on the JSP Publication Version and draft SA Report.
Schedule 2.1	Provide an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Chapter 2 and Appendix A The contents and main objectives of the plan are presented in Chapter 2. The plan's relationships to other plans and programmes is also addressed in Appendix A.	
Schedule 2.2	Provide information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Chapter 5 and Appendix B	
Schedule 2.3	Provide information on the environmental characteristics of areas likely to be significantly affected	Chapter 5 and Appendix B	
Schedule 2.4	Provide information on any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive	Scoping Report Chapter 5 and Appendix B See also Habitats Regulations Assessment	
Schedule 2.5	Provide information on the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way	Chapter 4 and Appendix A	

## Appendix C

	those objectives and any environmental considerations have been taken into account during its preparation		
Schedule 2.6	Provide information on the likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, including on issues listed (see below)	Chapter 7 and Appendix D (Appraisal Tables)	
	Provide information on the likely significant effects on biodiversity, fauna and flora		Objective 4b
	Provide information on the likely significant effects on population and human health		Objectives 1a, 1b, 1c, 2a, 2b, 2c, 2d, 2e, 2f, 3a, 3b, 4f, 4g, 4h, 5a
	Provide information on the likely significant effects on soil		Objectives 4d, 4e
	Provide information on the likely significant effects on water		Objectives 4f, 4g, 4h
	Provide information on the likely significant effects on air		Objective 1b
	Provide information on the likely significant effects on climatic factors		Objective 5b
	Provide information on the likely significant effects on material assets		Objectives 2a, 2c, 2d, 2e, 3a, 3b, 5a
	Provide information on the likely significant effects on cultural heritage including architectural and archaeological heritage		Objective 4a
	Provide information on the likely significant effects on landscape		Objective 4c



## Appendix C

	Provide information on the likely significant effects on the interrelationship between the above factors		The Appraisal Tables, in appraising each policy, refer to cross-cutting issues where relevant
Schedule 2.7	Provide information on the measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme		The Appraisal Tables, in appraising each policy, make judgements on the extent to which it seeks to minimise negative effects. Where possible, they also suggest potential improvements to the Publication Version. Improvements to other options are not suggested, as these are not options that are planned to be taken forward.
Schedule 2.8	Provide an outline of the reasons for selecting the alternatives dealt with	Chapter 6	
	Provide a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information		
Schedule 2.9	Provide a description of the measures envisaged concerning monitoring in accordance with Reg. 17	Chapter 8 and Appendix C	
Schedule 2.10	Provide a non-technical summary of the information provided under the above headings	See separate non-technical summary	

# Habitat Regulations Assessment (HRA): West of England Joint Spatial Plan (JSP) Update to the West of England Joint Committee 30<sup>th</sup> October 2017

## 1). Introduction

1.1 This paper has been produced by the four unitary authorities (UAs) which make up the West of England (WoE) sub-region. Its purpose is to provide an update on the progress of the Habitat Regulations Assessment for the Joint Spatial Plan.

### The West of England

1.2 The West of England (WoE) covers the four unitary authorities (UAs) of Bath and North East Somerset, Bristol, North Somerset and South Gloucestershire. The WoE thrives on its natural environment and excellent quality of life and has a growing national and international profile.

1.3 The outstanding environment of the sub-region makes a substantial contribution to quality of life and is a key driver for why people want to live, work and visit the area. The high quality environment additionally makes a significant contribution to the economic success of the area.

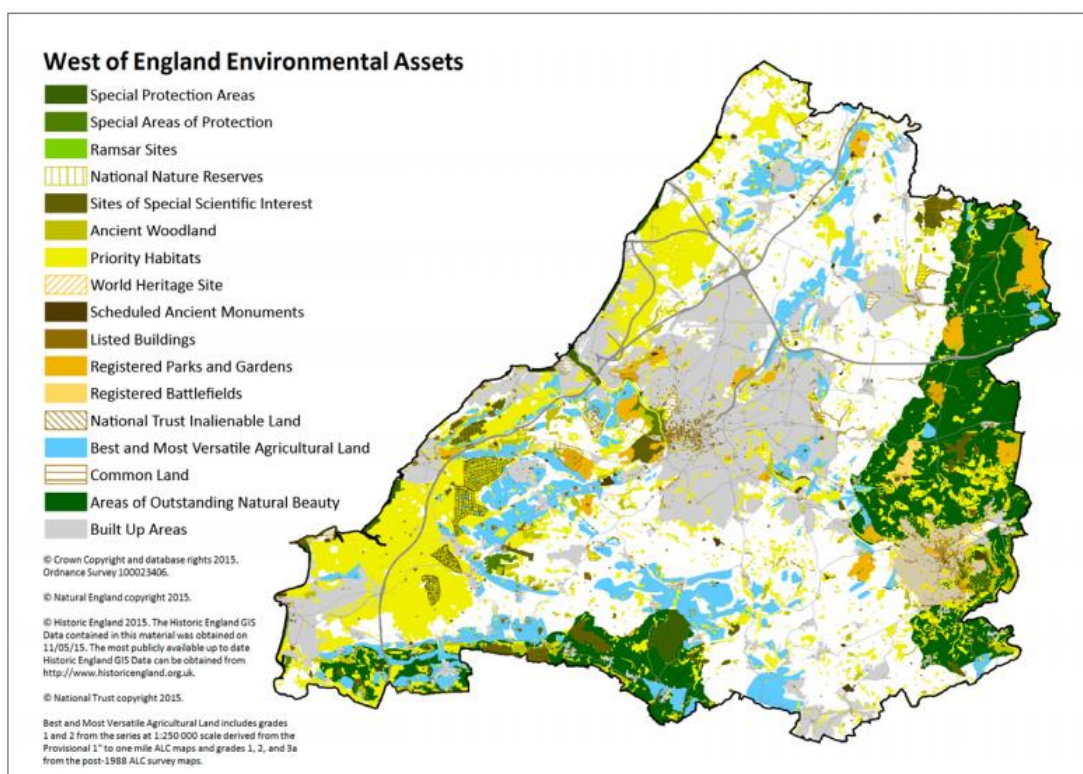


Figure 1 – the West of England’s Environmental Assets.

## Appendix D

### Joint Spatial Plan

1.4 The JSP identifies two Housing Market Areas that operate across the West of England. One focussed on the wider Bristol HMA, which includes Weston-Super-Mare as a sub housing market area, and the other focussed on Bath. The Bath SHMA has been updated to provide consistent information to 2036.

1.5 The Spatial Strategy has been formulated to deliver the Objectively Assessed Need of 97,800 new homes and the Housing Requirement of 102,200 new homes. The SHMA prepared for the West of England evidenced an Objectively Assessed Need (OAN) for housing of 97,800 dwellings for the plan period 2016-2036. This comprises 85,000 dwellings for Wider Bristol Housing Market Area (HMA) & 12,800 dwellings for the Bath HMA. It identifies an overall supply of 105,500 new homes to enable flexibility.

1.6 The JSP will provide the framework to deliver up to 105,500<sup>1</sup> net additional new homes between 2016 and 2036 of which, around 32,200 (30%) should be affordable homes.

1.7 The housing target supports the planned job growth of 82,500 jobs for the period 2016-2036 (or 125,900 jobs between the period from 2010-2036).

### Relationship of the Joint Spatial Plan to Local Plans

1.8 The JSP will, upon adoption, carry significant weight and be used to inform key planning decisions. Whilst it will not replace existing local plans, it will be a material consideration in decision making. In the meantime, existing local plans will continue to deliver existing Core Strategy targets. Local plan reviews will need to respond to the new strategic context. The JSP will when adopted provide the new higher level strategic planning framework for the four authorities to 2036.

1.9 The Housing and Planning Act 2016 has a new route for planning permission for housing led development called 'planning permission in principle' or PIP. A PIP may be granted for housing-led development either on application to the local planning authority (or Secretary of State in some instances), or through qualifying documents. The JSP is not a qualifying document for establishing planning permission in principle. The JSP Spatial Strategy will identify strategic development locations which will be brought forward as allocations through the local plan process.

---

1 Opinion Research Services (2016) West of England Housing Target: The basis for the Housing Requirement in the Joint Spatial Plan.

## Appendix D

### 2). Habitat Regulations Assessment

2.1 European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (known as the 'Habitats Directive') implemented in Britain by the Habitat Regulations 2010, provides legal protection for a range of habitats and species identified as being of European importance.

2.2 Article 2 of the Directive requires the maintenance or restoration of these habitats and species, in a favourable condition, and is achieved through the establishment and maintenance of protected areas referred to as Natura 2000 sites. These are comprised of Special Areas of Conservation (SAC) designated under European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('the Habitats Directive 1992'), implemented in Britain by the Conservation (Natural Habitats & c) Regulations 2010 ('the Habitat Regulations'); and Special Protection Areas (SPA) designated under EC Directive 79/409 on the Conservation of Wild Birds ('the Birds Directive') and Ramsar site under the Ramsar Convention on the Conservation of Wetlands of Importance.

2.3 Sites designated as wetlands of international importance under the Ramsar Convention are subject to the same provisions as Natura 2000 sites.

2.4 Article 6(3) of the Directive requires any 'plan or project' likely to have a significant effect on a Natura 2000 site be subject to 'appropriate assessment'. This means an assessment of the impacts of the plan/project on the site. As 'plans', the Regulations require local authorities to carry out an 'appropriate assessment' ('Habitat Regulations Assessment' or HRA) of local development documents before being adopted with the purpose being to assess the impacts of a 'land-use plan' against the conservation objectives of Natura 2000 Sites.

2.5 The phrase 'land-use plan' has been deemed by the European Court to include Development Plan Documents (i.e. Local Plans). Accordingly, as a land-use plan, the Joint Spatial Plan (JSP) must be subject to Assessment under Regulation 61 of the Habitat Regulations 2010.

#### What is the process for carrying out an HRA?

2.6 Article 6(3) of the Habitats Directive requires an 'appropriate assessment' to be undertaken when a plan or development project is likely to have a significant effect upon a European site.

2.7 Article 6(4) also requires that where an appropriate assessment has been carried out and results in a negative assessment, i.e. any proposed avoidance or mitigation are unable to reduce the potential significant impacts, or if uncertainty remains over the significant effects, the proposal can only be granted if:

- there are no alternative solutions; and
- there are no imperative reasons of overriding public interest (IROPI) for the development; and
- compensatory measures have been secured.

2.8 The regulations make reference to 'competent authorities'. These include relevant public bodies, government ministers, and statutory undertakers etc. who are able to carry out the 'appropriate assessment' of impacts in relation to the Habitats Regulations. Regulation 65 sets out the necessary stages that apply where more than one competent authority is involved in decision making. In this case, the competent authority is the four West of England unitary authorities.

### 3). Preparing the Joint Spatial Plan

3.1 The Joint Spatial Plan (JSP) has a clearly defined role which is to set out how the much needed new homes and employment land will be sustainably accommodated and what infrastructure is required to support this. Based on the JSP, more detailed land use policies will be set out in the local plans for the four Unitary Authorities (UAs).

3.2 The JSP will be prepared through a number of stages – these (and the timetable associated with them) are set out in Table 1 below, including reference to the relevant stages in the Town and Country Planning (Local Planning) Regulations 2012.

When	Stage	Time	Stage of HRA
October 2017	Draft plan to Infrastructure Advisory Board and Joint Committee		HRA update to inform draft Publication Plan and the Joint Committee.
November 2017 to January 2018	Publication Plan (Reg 19/20)	7 week consultation	Full HRA
Spring 2018	Submit to Secretary of State	TBC	N/A
Mid 2018	Examination in Public (EiP)	TBC	N/A

Table 1

3.3 With this in mind, the purpose of this paper is to update the process for undertaking, a full Habitat Regulations Assessment in support of the Joint Spatial Plan, in line with up to date guidance. In doing so, it is intended that it will ensure the approach to the HRA process and the information on European sites to be considered is appropriate. The full HRA Report for the Joint Spatial Plan will be published alongside the Publication Plan in 2017.

3.4 Once the JSP is adopted, it will be for the four UAs, working with Natural England to decide what additional work is necessary to ensure that their Local Plans meet the requirements of the Conservation of Habitats and Species Regulations 2010.

## Appendix D

### 4). The HRA Process

4.1 In line with up to date guidance, the JSP has been subject to a four stage process. This process represents a slight change from the three stage process used to assess the majority of the four UA's individual extant Local Plan documents.

4.2 The nature of the JSP means that the HRA required must be 'strategic' in nature and therefore by necessity defers specific assessments of impacts and detailed mitigation requirements to the four unitary authorities Local Plans. Additionally, assessments of transport mitigation to support JSP growth will be further assessed through the updated Joint Local Transport Plan HRA.

4.3 The objective of this HRA is therefore to determine if there can be a reasonable degree of certainty that the quantum of development proposed by the JSP can be delivered through the lower tier plans without resulting in significant harm to Natura 2000 sites.

4.4 Table 2 below sets out the four stages.

Habitat Regulation Assessment – Stage	Purpose
1. Screening	Process for identifying potential impacts of a plan or project on a European site, either individually or in combination, and consideration of whether likely effects will be significant.
2. Appropriate Assessment	Consideration of impacts on integrity of the site, either individually or in combination with other plans and projects, having regard to the site's structure, function and conservation objectives. Where adverse impacts are identified, assess mitigation options to identify impacts on the integrity of the site. This stage should involve consultation. If mitigation options do not result in avoidance of adverse effects permission can only be granted if the remaining 2 stages are followed.
3. Assessment of alternative solutions	Review and examine alternatives to achieve objectives; would these alternative solutions avoid or have less adverse effects on the European sites?
4. Assessment of any 'imperative reasons of overriding public interest' (IROPI)	Where no suitable alternative solution exists and adverse impacts still remain then assess whether the development is necessary for IROPI. If so then identify potential compensatory measures to maintain integrity and coherence of the protected site.

Table 2 – HRA process guide

#### Stage 1 - Screening

4.5 EC Directive 92/43/EEC requires that a screening assessment is undertaken by the competent authority, and should consider the following matters:

- assessment of the project including its objectives; and
- assessment of relevant plans, policies and projects; and
- assessment of relevant European sites that could potentially be affected – including their specific characteristics and conservation objectives.

## Appendix D

4.6 A screening assessment, both alone and in combination, with other identified plans and projects will identify if any significant environmental affects will result affecting the site and conclude whether significant affects are likely or not.

4.7 When undertaking this assessment a precautionary approach is required to decision making and assessment. This means that when the likelihood of significant affects cannot be ruled out on the evidence available, then it must be assumed that a risk of significant affects may exist. These will then need to be addressed through either changes to the scheme, avoidance or through securing mitigation measures.

4.8 If no potential significant affects are identified, the process ends at this stage.

### Stage 2 – Appropriate Assessment

4.9 Regulation 61 of the Habitat Regulations stipulates that the ‘appropriate assessment’ process should consider ‘the implications for the site in view of that site’s conservation objectives’. As such, the HRA needs to understand the reasons for the European sites’ designation (i.e. the particular species and habitats present); the condition of each site *vis-a-vis* their conservation objectives; the factors which might adversely impact on the qualifying features; and determine whether or not the impact is likely to be significant.

4.10 A profile of each of the affected sites will need to be drawn up based on up to date information. This information will include the reasons for their designation (the qualifying features and species) as well as the factors likely to have the greatest deleterious effects on each site. This work will be undertaken once options for development are better defined.

4.11 If it is decided that the JSP would be likely to result in significant adverse impacts on a European site, an appropriate assessment will be undertaken. The Regulations do not define ‘significant impacts’, so an informed decision will be made on this issue. In order to decide whether an appropriate assessment is required, a variety of information will be considered. This could include:

- a detailed description of the European site, identifying any/all features potentially affected, highlighting the site’s conservation objectives;
- a detailed description of the proposed development(s), processes, construction, phases, methods of work etc.;
- details of alternatives considered, along with any mitigation measures proposed to reduce, remove or manage impacts;
- provision of necessary data, evidence and reports – including interpretation of that information to aid decision making;
- appraisal of any other plans or projects likely to have a significant effect, either individually or in combination with the proposed development;
- appraisal of whether there is potential for the scheme to require two or more appropriate assessments by different competent authorities.

4.13 Natural England has also produced Site Improvement Plans for European Sites. These set out their understanding of the pressures on, and condition of European designated sites, and identify potential mitigation measures that might be introduced. This information will be of some material significance in supporting and informing the HRA for the Joint Spatial Plan.

## Appendix D

4.14 More information regarding the Improvement Programme for England's Natura 2000 sites (IPENS)/LIFE Natura 2000 (LifeN2K) and the Site Improvement Plans (SIP) are also available (<https://www.gov.uk/government/publications/improvement-programme-for-englands-natura-2000-sites-ipens>) and may be used to inform this part of the process.

4.15 When considering whether a plan or project will adversely affect the integrity of the European site, regard will be had to the manner in which the JSP is to be delivered, i.e. through the UA's Local Plans.

### Stage 3 – Alternative Solutions

4.16 At this stage the assessment will, if necessary, include consideration of alternatives, including how mitigation measures may help to reduce or avoid these effects. The opportunities for alternatives will vary depending upon the location and scale of development proposed, and as such, alternative solutions could include proposals of a different scale, location, phasing, a different scheme or no scheme at all.

4.17 Where it has been demonstrated there are no alternative solutions with lesser effects, the project can still be carried out if 'imperative reasons of overriding public interest' apply.

4.18 It is important to note that the detailed policies required to deliver the strategic growth proposed through the JSP will be delivered through UA's Local Plans.

### Stage 4 – Considerations of overriding public interest

4.19 If it is agreed that there are no alternative solutions, and the plan must be progressed for imperative reasons of overriding public interest (IROPI) then it can still do so.

4.20 Where a location hosts a priority natural habitat type or a priority species, the reasons for justifying the scheme must relate to either:

- reasons relating to human health, public safety or beneficial consequences of primary importance to the environment; or
- any other reasons which the competent authority, having due regard to the opinion of the European Commission, consider to be imperative reasons of overriding public interest.



## Appendix D

### 5. Screening

5.1 The initial screening stages have been completed for the draft publication JSP. This process has involved the initial screening in of sites that could feasibly be affected by the JSP, then more detailed screening of the objectives and JSP Policies in terms of sites screened in for further scrutiny. The staged screening approach involved the following:

#### Identifying likely significant effects (LSEs)

5.2 When considering the LSEs of a policy, it is recognised that some policy ‘types’ cannot affect any European sites. Different guidance documents suggest various classification and referencing systems to help identify those policies that can be safely screened out to ensure the HRA focuses on the policies with any potential to result in LSEs.

5.3 Table 3 below summarises the characteristics of policies that can usually be ‘screened out’.

Policy type	Commentary
General statements of policy	The EC recognises that plans or plan components that are general statements of policy or political aspirations cannot have significant effects.
General design/ design criteria	A general ‘criteria-based’ policy expresses the tests or expectations of the plan-making body when it comes to consider particular proposals, or relate to design or other qualitative criteria which do not themselves lead to development (e.g. controls on building design).
External plan/ projects	Plans or projects that are proposed by other plans and are referred to in the plan being assessed for completeness.
Environmental protection policies	Policies designed to protect the natural or built environment will not usually have significant or adverse effects.

Table 3

\*European Commission (2000). Managing Natura 2000 sites: the provisions of Art. 6 of the ‘Habitats’ Directive 92/43/EEC April 2000 at 4.3.2

5.4 This assessment of likely significant effects has been undertaken in support of the publication Joint Spatial Plan.

#### Identification of relevant sites

5.5 Following consideration of the approach taken to HRA for previous Local Plan (development plan) documents in the West of England, e.g. Joint Waste Core Strategy and the Bristol City and South Gloucestershire Core Strategies, a list of Natura 2000 sites within the West of England and up to 15km from the boundary, as shown in Figure 2 (below), have been identified.

5.6 The radius of 15km was chosen following engagement with Natural England. It also accords with the HRA screening processes carried out on the Local Plan documents (listed above). This created an initial list of 14 sites which were then considered through the screening process. These sites are:

- Avon Gorge Woodlands Special Areas of Conservation (SAC);
- Bath & Bradford-on-Avon Bats Special Areas of Conservation (SAC);
- Chew Valley Special Protection Areas (SPA);

## Appendix D

- Mells Valley Special Areas of Conservation (SAC);
- Mendip Limestone Grasslands Special Areas of Conservation (SAC);
- Mendip Woodlands Special Areas of Conservation (SAC);
- North Somerset and Mendip Bats Special Areas of Conservation (SAC);
- Rodborough Common Special Areas of Conservation (SAC);
- River Usk / Afon Wysg Special Areas of Conservation (SAC);
- River Wye / Afon Gwy Special Areas of Conservation (SAC);
- Severn Estuary Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar site;
- Somerset Levels and Moors Special Protection Areas (SPA) and Ramsar;
- Wye Valley & Forest of Dean Bat Sites Special Areas of Conservation (SAC); and
- Wye Valley Woodlands Special Areas of Conservation (SAC).

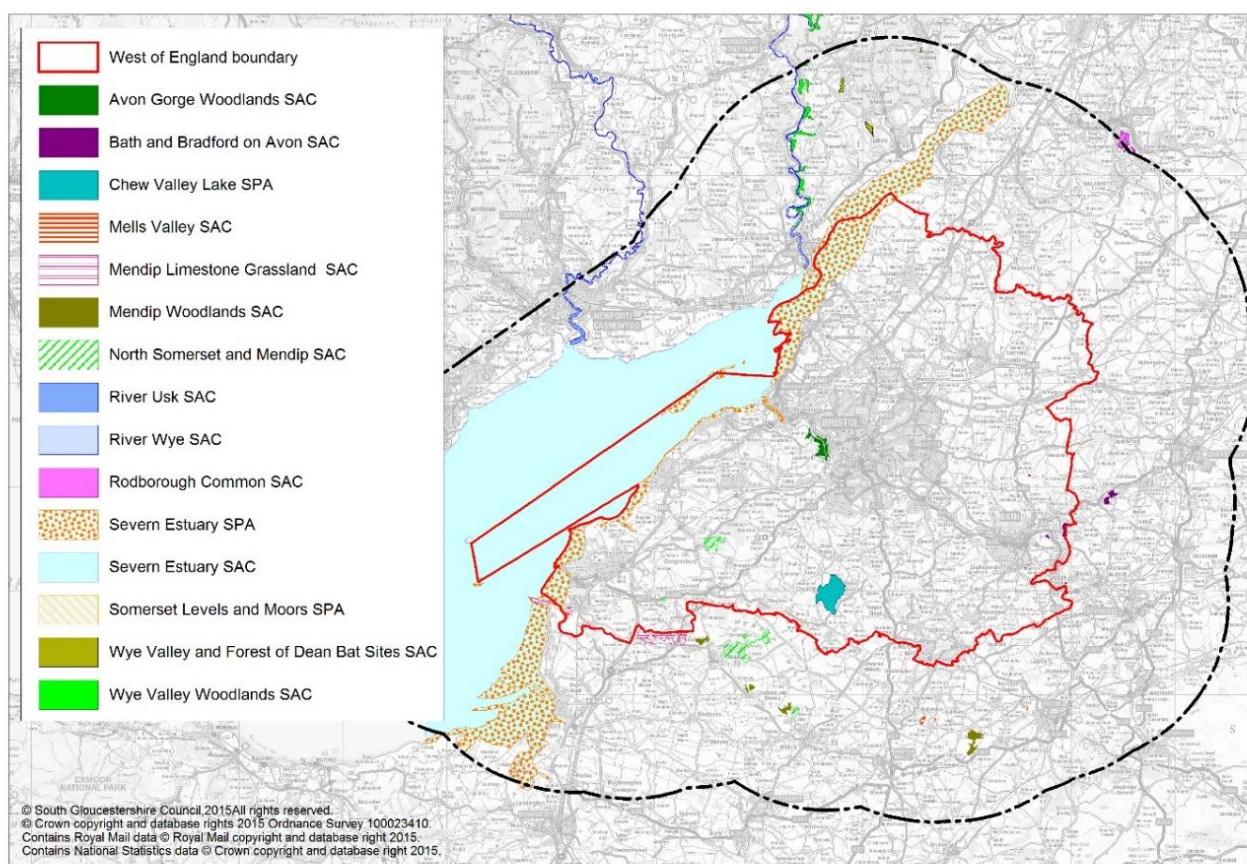


Figure 2

5.7 For reference, a summary of each European site, its qualifying criteria, conservation objectives and key sensitivities is set out at Appendix A.

### Buffer zones

5.9 The Natura 2000 were then buffered using appropriate buffer zones to help identify any Natura 2000 sites that could be at risk of impact from the JSP proposals, and to filter out those sites not considered at risk of any significant impacts. Each element of the plan has been reviewed and its potential impacts considered.

## Appendix D

5.10 The buffer zones used have been derived from consideration of the nature and character of each Natura 2000 site, including their conservation objectives, and consideration of the various elements of the JSP.

5.11 In this regard it is important to note that the high quality environment of the West of England is recognised as a critical issue for the plan, and the plan has been prepared using a spatial strategy that avoids any direct impacts upon protected sites, including Natura 2000 sites.

5.12 The buffers used to inform the screening stage were the subject of discussions with Natural England. The buffers used were:

- 4 km from the boundaries of the Bat SACs (Bath and Bradford-on-Avon Bats SAC and North Somerset and Mendips Bats SAC).
  - This reflects that these sites were considered to be at most potential risk from loss and fragmentation of foraging areas and flight lines, resulting from the development of greenfield sites and associated potential loss of grazing and hedgerow networks.
- 7km from the boundaries of the Chew Valley Lake SPA, Avon Gorge Woodlands SAC and the Severn Estuary SAC, SPA and Ramsar site.
  - This reflects that these sites were considered to be at most potential risk from an increase in recreational pressures. The buffer was based on the Thames Basin Heaths SPA Framework (LINK) and relates to the distances people travel for recreation.
- 200m from the boundary of sensitive sites (name).
  - This reflects the need to address highlight issues for grassland and woodland sites which are considered to potentially be at risk from increased air pollution resulting from increased traffic movement. This was based on Design Manual for Roads and Bridges (DMRB): Standards for Highways (LINK).

## Outcomes

5.13 Following the buffering exercise, the following sites were screened in for further assessment:

- Chew Valley Lake SPA
- Avon Gorge Woodlands SAC
- Bath and Bradford-on-Avon Bats SAC
- North Somerset and Mendips Bats SAC
- Severn Estuary SAC, SPA and Ramsar

5.14 In order to facilitate the detailed assessment of likely impacts on these sites, the guidance and screening methods within the Handbook for HRA (LINK) were utilised.

5.15 A list of the generic impacts for the sites that have been screened in is set out below.

## Appendix D

### Generic Chew Valley Lake Impacts

**Potential Issues:**

- Reduction in water level – increased abstraction through new housing
- Reduction in water quality – eutrophication through increased visitors/recreation
- Increased recreational use/visitors

**Potential Effects:**

- Disturbance/displacement of SPA birds
- Loss or degrading of habitat available to SPA birds

### Generic Avon Gorge Woodlands Impacts

**Potential Issues:**

- Increased recreational use/visitors
- Increased NOx concentrations and nitrogen deposition.

**Potential Effects:**

- Potential recreational impacts on the Tilio-Acerion forests of slopes, scree and ravines, with potential also for impacts on the secondary interest features - semi-natural dry grassland and scrubland facies: on calcareous substrates (Festuco-Brometalia).
- Potential for eutrophication of qualifying interest feature habitats.

### Generic Bat SAC (Bath and Bradford-on-Avon, North Somerset and Mendips) Impacts

**Potential Issues:**

- Loss of greenfield land
- Increased recreational pressures
- Increased noise and light pollution
- Traffic-generated air pollution
- Increased urban-fringe pressures (domestic cats, noise, disturbance – potentially reducing agricultural viability)
- Reduced viability and potential loss of existing agricultural landscape

**Potential Effects:**

- Reduction of habitat quality and function close to some sites (including function as foraging grounds or access ways)
- Habitat loss close to some sites
- Habitat fragmentation

### Generic Severn Estuary Impacts

**Potential Issues:**

- Greater number of people visiting the Estuary and thus increased recreational pressure from more cyclists, dog walkers etc using coastal footpath (Severn Way).
- Cumulative impact through increased recreational use and development within and around Avonmouth/Sevenside Enterprise Area.

**Potential Effects:**

- Disturbance/displacement of water birds along foreshore of the Severn Estuary.

## Appendix D

### Sequential approach to screening

5.16 The JSP vision and objectives, and policies were considered first and any potential recommendations for change, or requirements for the lower order plans (the four UAs Local Plans) to address were identified.

5.17 The key components of the JSP spatial strategy, strategic development locations (SDLs) and urban living, were then considered. To aid this process a list of generic potential impacts and mitigation solutions were identified and have been used to help assess the likelihood of significant impacts occurring and to identify the scope and nature of mitigation solutions that exist. These measures may then become requirements that need to be set out in JSP policy. Alternatively, they may become requirements to be delivered through the local plan process and/or should be addressed in future work, such as the West of England Environment Plan.

### Natura 2000 site profiles

5.18 Site profiles have been created for each site to capture key site details and to identify likely impacts potentially resulting from the JSP, including cumulative impacts, and to identify potential mitigation solutions that can be included within / through the Plan (the JSP).

5.19 The format of the site profiles are as follows:

1. Qualifying Features
2. Key sites sensitivities
3. Conservation objectives
4. Conservation conditions
5. Site improvement plan
6. Impacts/risks
  - a. Identification of risk/impacts
  - b. Cumulative impacts
7. Mitigation – strategic level narrative
  - a. Potential Impacts
  - b. Mitigation solutions
  - c. JSP measures
  - d. Local Plan measures

5.20 In addition/ alongside the site profiles, a series of tables have been developed to record the initial screening of likely effects of each element of the plan on the screened in sites, and to enable mitigation solutions to be identified and secured. This table includes the following details:

- a) Screening criteria
- b) JSP strategic priorities and policies
- c) SDL buffer screening
- d) JSP Strategic Development Locations (SDLs)
- e) JSP urban living
- f) Non-strategic growth
- g) Small windfall sites
- h) JSP transport mitigation

5.21 The objective of this methodology is to enable any potential adverse impacts of the plan upon Nature 2000 sites to be identified and then removed or moderated to ensure no significant effects result. It

## Appendix D

has been drafted on the basis of known best practice and has been discussed and agreed with Natural England. Further information is available at Appendix B.

### Screening criteria

5.22 The screening categories used have been taken from The Habitats Regulations Assessment Handbook (Tyldesley, D and Chapman, C. (2013)), and are set out below for information/ reference in the table below.

Screening categories	Code
A general statement of policy	A
Policy listing general criteria for testing proposals	B
Proposals referred to but not proposed by the plan	C
Environmental protection policies	D
Steering change away from positive sites	E
Do not propose change, but control approach (e.g. design)	F
No conceivable effect	G
Actual or theoretical effects cannot undermine conservation objectives	H
Likely Significant Effect (LSE) on a site alone	I
No Likely Significant Effect (LSE) alone but an effect - check in combination	J
No Likely Significant Effect (LSE) even in combination	K
Likely Significant Effect (LSE) in combination	L

5.23 Any component of the JSP allocated a screening category of I, J or L (highlighted above in yellow) required an action to be taken or an amendment made to the Plan. Recommended solutions to address these issues will be set out in the full HRA which will be published alongside the publication version of the JSP in November.

### Status of this document

5.24 The HRA is at an advanced stage of preparation, and has followed the process agreed with Natural England. The screening process has been completed and has informed the preparation of the draft Publication Plan.

5.25 This process screened in three policies for further review in the context of the requirements of HRA. Full details of this will be set out in the final HRA Report. Through working with Natural England, recommendations for additional policy wording and plan requirements have been identified which enable those policies to be screened out.

5.26 The HRA has therefore screened out any likely significant effects (LSE) and in doing so has informed the preparation of the draft Publication JSP document. Details of the process will be set out in full in the HRA report published alongside the publication version JSP.

5.27 A full HRA report is currently being finalised and will be published for formal consultation alongside the publication version Joint Spatial Plan in November 2017.

Appendix D

Appendix A – List of European sites, qualifying features, conservation objectives and key sensitivities

Site	Qualifying features	Conservation objectives	Key site sensitivities
<p><b>Avon Gorge Woodlands SAC</b></p>	<p>Annex 1 Habitats that are a primary reason for selection:</p> <ul style="list-style-type: none"> <li>• H9180. Tilio-Acerion forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes*</li> </ul> <p>Annex 1 Habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>• H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (FestucoBrometalia); Dry grasslands and scrublands on chalk or limestone</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats</li> <li>• The structure and function (including typical species) of qualifying natural habitats, and</li> <li>• The supporting processes on which qualifying natural habitats rely</li> </ul>	<p><u>Air quality</u> – woodland and grassland.</p> <p>In particular eutrophication or acidification could lead to successional vegetation change.</p> <p><u>Habitat management</u> Maintenance of woodland structure and composition</p> <p><u>Habitat loss</u> Habitat fragmentation</p>
<p><b>Bath and Bradford-on-Avon Bats SAC</b></p>	<p>Annex II species that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> <li>• S1304. Rhinolophus ferrumequinum; Greater horseshoe bat</li> <li>• S1323. Myotis bechsteinii; Bechstein`s bat</li> </ul> <p>Annex II species present as a qualifying feature, but not a primary reason for selection of the site:</p> <ul style="list-style-type: none"> <li>• S1303. Rhinolophus hipposideros; Lesser horseshoe bat</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>• The extent and distribution of the habitats of qualifying species</li> <li>• The structure and function of the habitats of qualifying species</li> <li>• The supporting processes on which the habitats of qualifying species rely</li> <li>• The populations of qualifying species, and,</li> </ul>	<p><u>Habitat Management</u> Maintenance of foraging and commuting linkage habitat.</p> <p><u>Habitat Loss</u> Habitat fragmentation resulting in loss of connectivity for foraging and commuting.</p> <p>Direct loss of roost sites.</p> <p><u>Other Management Issues</u> Local Grazing regimes</p>

Appendix D

		<ul style="list-style-type: none"> <li>The distribution of qualifying species within the site.</li> </ul>	
<b>Chew Valley SPA</b>	<p>Internationally important bird assemblage. This site qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <p>Over winter:</p> <ul style="list-style-type: none"> <li>A056. Anas clypeata; Northern shoveler (Non-breeding)</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>The extent and distribution of the habitats of the qualifying features</li> <li>The structure and function of the habitats of the qualifying features</li> <li>The supporting processes on which the habitats of the qualifying features rely</li> <li>The population of each of the qualifying features, and,</li> <li>The distribution of the qualifying features within the site.</li> </ul>	<p><u>Maintain favourable hydrology</u> Site is sensitive to changes in water levels. Both increases and reductions can impact upon shoveler, due to their need for soft mud in which to feed. Also to fluctuations in water quality including eutrophication and particularly phosphate levels.</p>
<b>Mells Valley SAC</b>	<p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (FestucoBrometalia); Dry grasslands and scrublands on chalk or limestone</li> <li>H8310. Caves not open to the public</li> </ul> <p>Annex II species that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> <li>S1304. Rhinolophus ferrumequinum; Greater horseshoe bat</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>The extent and distribution of qualifying natural habitats and habitats of qualifying species</li> <li>The structure and function (including typical species) of qualifying natural habitats</li> <li>The structure and function of the habitats of qualifying species</li> <li>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</li> <li>The populations of qualifying species, and,</li> </ul>	<p><u>Air Quality</u> Eutrophication could lead to successional vegetation change</p> <p><u>Habitat Management</u> Maintenance of grassland structure and composition</p> <p>Maintenance of foraging and commuting linkage habitat.</p> <p><u>Habitat Loss</u> Habitat fragmentation resulting in loss of</p>



Appendix D

		<ul style="list-style-type: none"> <li>The distribution of qualifying species within the site.</li> </ul>	<p>connectivity for foraging and commuting</p> <p>Direct loss of roost sites</p> <p><u>Other Management Issues</u> Grazing regime</p>
<p><b>Mendip Limestone Grasslands SAC</b></p>	<p>Annex I habitats that are a primary reason for the selection of the site:</p> <ul style="list-style-type: none"> <li>H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco Brometalia); Dry grasslands and scrublands on chalk or limestone</li> </ul> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>H4030. European dry heaths</li> <li>H8310. Caves not open to the public</li> <li>H9180. Tilio-Acerion forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes*</li> <li>S1304. Rhinolophus ferrumequinum; Greater horseshoe bat</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>The extent and distribution of qualifying natural habitats and habitats of qualifying species</li> <li>The structure and function (including typical species) of qualifying natural habitats</li> <li>The structure and function of the habitats of qualifying species</li> <li>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</li> <li>The populations of qualifying species, and,</li> <li>The distribution of qualifying species within the site.</li> </ul>	<p><u>Air Quality</u> Eutrophication could lead to successional vegetation change</p> <p><u>Habitat Management</u> Maintenance of grassland structure and composition</p> <p><u>Habitat Loss</u> Habitat fragmentation</p> <p><u>Other Management Issues</u> Grazing regime</p>
<p><b>Mendip Woodlands SAC</b></p>	<p>Annex I habitats that are a primary reason for the selection of the site:</p> <ul style="list-style-type: none"> <li>H9180. Tilio-Acerion forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes*</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>The extent and distribution of qualifying natural habitats</li> </ul>	<p><u>Air Quality</u> In particular eutrophication or acidification could lead to successional vegetation change</p> <p><u>Habitat Management</u></p>

Appendix D

		<ul style="list-style-type: none"> <li>• The structure and function (including typical species) of qualifying natural habitats, and</li> <li>• The supporting processes on which qualifying natural habitats rely</li> </ul>	<p>Maintenance of woodland structure and composition.</p> <p><u>Habitat Loss</u> Habitat fragmentation.</p> <p><u>Other Management Issues</u> Grazing regime.</p>
<p><b>North Somerset and Mendip Bats SAC</b></p>	<p>Annex I habitats that are a primary reason for the selection of the site:</p> <ul style="list-style-type: none"> <li>• H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (FestucoBrometalia); Dry grasslands and scrublands on chalk or limestone</li> <li>• H9180. Tilio-Acerion forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes*</li> </ul> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>• H8310. Caves not open to the public</li> </ul> <p>Annex II species that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> <li>• S1303. Rhinolophus hipposideros; Lesser horseshoe bat</li> <li>• S1304. Rhinolophus ferrumequinum; Greater horseshoe bat</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats and habitats of qualifying species</li> <li>• The structure and function (including typical species) of qualifying natural habitats</li> <li>• The structure and function of the habitats of qualifying species</li> <li>• The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</li> <li>• The populations of qualifying species, and,</li> <li>• The distribution of qualifying species within the site</li> </ul>	<p><u>Habitat Management</u> Maintenance of foraging and commuting linkage habitat.</p> <p><u>Habitat Loss</u> Habitat fragmentation resulting in loss of connectivity for foraging and commuting.</p> <p>Direct loss of roost sites</p> <p><u>Other Management Issues</u> Local Grazing regimes</p>

Appendix D

<p><b>River Usk / Afon Wysg SAC</b></p>	<p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>• 3260 Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation</li> </ul> <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>• 1095 Sea lamprey <i>Petromyzon marinus</i></li> <li>• 1096 Brook lamprey <i>Lampetra planeri</i></li> <li>• 1099 River lamprey <i>Lampetra fluviatilis</i></li> <li>• 1103 Twaite shad <i>Alosa fallax</i></li> <li>• 1106 Atlantic salmon <i>Salmo salar</i></li> <li>• 1163 Bullhead <i>Cottus gobio</i></li> <li>• 1355 Otter <i>Lutra lutra</i></li> </ul> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection</p> <ul style="list-style-type: none"> <li>• 1102 Allis shad <i>Alosa alosa</i></li> </ul>	<ul style="list-style-type: none"> <li>• To maintain the availability of current spawning sites and lamprey nurseries.</li> <li>• To maintain suitable flows, water quality and sediment loads to sustain the population of shad, lamprey and nurseries.</li> <li>• To maintain riparian habitats to ensure optimum conditions for shad lamprey and bullhead.</li> <li>• To identify all linking factors on the population of shad, lamprey and bullhead and to seek to remove or minimise their effects.</li> <li>• Protection of otter breeding sites and resting places.</li> </ul>	<p><u>Water Quality</u> Abstraction threats, changes in water level and water quality, including eutrophication.</p>
<p><b>River Wye / Afon Gwy SAC</b></p>	<p>Annex I habitats that are a primary reason for the selection of the site:</p> <ul style="list-style-type: none"> <li>• H3260. Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation; Rivers with floating vegetation often dominated by water-crowfoot</li> </ul> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats and habitats of qualifying species</li> <li>• The structure and function (including typical species) of qualifying natural habitats</li> <li>• The structure and function of the habitats of qualifying species</li> </ul>	<p><u>Water Quality</u> Abstraction threats, changes in water level and water quality, including eutrophication.</p>

Appendix D

	<ul style="list-style-type: none"> <li>• H7140. Transition mires and quaking bogs; Very wet mires often identified by an unstable `quaking` surface</li> </ul> <p>Annex II species that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> <li>• S1092. Austropotamobius pallipes; White-clawed (or Atlantic stream) crayfish</li> <li>• S1095. Petromyzon marinus; Sea lamprey</li> <li>• S1096. Lampetra planeri; Brook lamprey</li> <li>• S1099. Lampetra fluviatilis; River lamprey</li> <li>• S1103. Alosa fallax; Twaite shad</li> <li>• S1106. Salmo salar; Atlantic salmon</li> <li>• S1163. Cottus gobio; Bullhead</li> <li>• S1355. Lutra lutra; Otter</li> </ul> <p>Annex II species present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>• S1102. Alosa alosa; Allis shad</li> </ul>	<ul style="list-style-type: none"> <li>• The supporting processes on which qualifying natural habitats and habitats of qualifying species rely</li> <li>• The populations of qualifying species, and,</li> <li>• The distribution of qualifying species within the site.</li> </ul>	
<p><b>Roborough Common SAC</b></p>	<p>Annex 1 habitats that are a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>• H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats</li> <li>• The structure and function (including typical species) of qualifying natural habitats, and</li> <li>• The supporting processes on which qualifying natural habitats rely</li> </ul>	<p><u>Air Quality</u> Eutrophication could lead to successional vegetation change</p> <p><u>Habitat Management</u> Maintenance of grassland structure and composition</p> <p><u>Habitat Loss</u> Habitat fragmentation.</p>

Appendix D

<p><b>Severn Estuary SAC, SPA and Ramsar</b></p>	<p><u>SAC</u></p> <p>Annex I habitats that are a primary reason for the selection of the site:</p> <ul style="list-style-type: none"> <li>• 1130. Estuaries</li> <li>• 1140. Mudflats and sandflats not covered by seawater at low tide</li> <li>• 1330. Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>)</li> </ul> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>• 1110. Sandbanks slightly covered by sea water all the time</li> <li>• 1170. Reefs</li> </ul> <p>Annex II species that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> <li>• 1095. <i>Petromyzon marinus</i> (Sea lamprey)</li> <li>• 1099. <i>Lampetra fluviatilis</i> (River lamprey)</li> <li>• 1109. <i>Alosa fallax</i> (Twaite shad)</li> </ul> <p><u>SPA</u></p> <p>This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p>Over winter:</p> <ul style="list-style-type: none"> <li>• A037. <i>Cygnus columbianus bewickii</i> (Bewick's swan)</li> <li>• Internationally important bird assemblage.</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>• The extent and distribution of the habitats of the qualifying features</li> <li>• The structure and function of the habitats of the qualifying features</li> <li>• The supporting processes on which the habitats of the qualifying features rely</li> <li>• The population of each of the qualifying features, and,</li> <li>• The distribution of the qualifying features within the site.</li> </ul>	<p><u>Water Quality</u></p> <p>Change in tidal regime leading to successional change of shoreline habitat.</p> <p><u>Air Quality – Saltmarsh</u></p> <p>Eutrophication could lead to successional vegetation change.</p> <p><u>Habitat Disturbance - SPA</u></p> <p>Wintering waterfowl populations. Displacement, litter, human disturbance – noise, visual.</p>
--	---	--	---

Appendix D

	<p>This site qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <p>On passage:</p> <ul style="list-style-type: none"><li>• Charadrius hiaticula (Ringed plover)</li><li>• Calidris alpina alpina (Dunlin)</li><li>• Nuntenius phaeopus (Whimbrel)</li><li>• Tringa tetanus (Redshank)</li></ul> <p>Over winter:</p> <ul style="list-style-type: none"><li>• A394. Anser albifrons albifrons; Greater white-fronted goose (Non-breeding)</li><li>• A048. Tadorna tadorna; Common shelduck (Non-breeding)</li><li>• A051. Anas strepera; Gadwall (Non-breeding)</li><li>• A149. Calidris alpina alpina; Dunlin (Non-breeding)</li><li>• A162. Tringa totanus; Common redshank (Non-breeding)</li></ul> <p>The Estuary also supports nationally important wintering populations of a further 10 species:</p> <ul style="list-style-type: none"><li>• Anas Penelope (Wigeon)</li><li>• Anas crecca (Teal)</li><li>• Anas acuta (Pintail)</li><li>• Aythya ferina (Pochard)</li><li>• Aythya fuligula (Tufted duck)</li><li>• Charadrius hiaticula (Ringed plover)</li><li>• Pluvialis squatarola (Grey plover)</li><li>• Numenius arquata (Curlew)</li><li>• Nuntenius phaeopus (Whimbrel)</li><li>• Tringa tetanus (Redshank)</li></ul>		
--	--	--	--

Appendix D

	<p><u>Ramsar</u></p> <p>Assemblage qualification: A wetland of international importance.</p> <p>The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl.</p> <ul style="list-style-type: none"> <li>• Criterion 1: Presence of Annex I features listed above for SAC.</li> <li>• Criterion 3: Unusual estuarine communities.</li> <li>• Criterion 4: Run of migratory fish between sea and river via estuary.</li> <li>• Criterion 5/6: Bird assemblages and species of international importance.</li> <li>• Criterion 8: Diverse fish populations, important feeding, nursery ground and migration route.</li> </ul>		
<p><b>Somerset Levels and Moors SPA and Ramsar</b></p>	<p><u>SPA</u></p> <p>This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p>Over winter:</p> <ul style="list-style-type: none"> <li>• A037 <i>Cygnus columbianus bewickii</i>; Bewick’s swan (Non-breeding)</li> <li>• A140 <i>Pluvialis apricaria</i>; European golden plover (Non-breeding)</li> <li>• Waterbird assemblage</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>• The extent and distribution of the habitats of the qualifying features</li> <li>• The structure and function of the habitats of the qualifying features</li> <li>• The supporting processes on which the habitats of the qualifying features rely</li> <li>• The population of each of the qualifying features, and,</li> <li>• The distribution of the qualifying features within the site.</li> </ul>	<p><u>Water Quality</u> Maintain favourable hydrology. Water levels and abstraction.</p> <p><u>Air Quality</u> Successional habitat change through eutrophication.</p> <p><u>Habitat Management</u> Grazing issues</p>

Appendix D

	<p>This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <p>Over winter:</p> <ul style="list-style-type: none"> <li>• A052 Anas crecca; Eurasian teal (Non-breeding)</li> <li>• A142 Vanellus vanellus; Northern lapwing (Non-breeding)</li>   <li>• Anas clypeata(Shoveler)</li> <li>• Anas crecca(Teal)</li> <li>• Anas penelope(Wigeon)</li> </ul> <p><u>Ramsar</u></p> <p>Assemblage qualification: A wetland of international importance.</p> <p>The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl.</p>		
<p><b>Wye Valley &amp; Forest of Dean Bat Sites SAC</b></p>	<p>Annex II species that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> <li>• S1303. Rhinolophus hipposideros; Lesser horseshoe bat</li> <li>• S1304. Rhinolophus ferrumequinum; Greater horseshoe bat</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>• The extent and distribution of the habitats of qualifying species</li> <li>• The structure and function of the habitats of qualifying species</li> <li>• The supporting processes on which the habitats of qualifying species rely</li> <li>• The populations of qualifying species, and</li> </ul>	<p><u>Habitat Management</u></p> <p>Maintenance of foraging and commuting linkage habitat.</p> <p><u>Habitat Loss</u> Habitat fragmentation resulting in loss of connectivity for foraging and commuting.</p> <p>Direct loss of roost sites.</p>



Appendix D

		<ul style="list-style-type: none"> <li>The distribution of qualifying species within the site.</li> </ul>	
<p><b>Wye Valley Woodlands SAC</b></p>	<p>Annex I habitats that are a primary reason for the selection of the site:</p> <ul style="list-style-type: none"> <li>H9130. Asperulo-Fagetum beech forests; Beech forests on neutral to rich soils</li> <li>H9180. Tilio-Acerion forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes*</li> <li>H91J0. Taxus baccata woods of the British Isles; Yew-dominated woodland*</li> </ul> <p>Annex II species present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>S1303. Rhinolophus hipposideros; Lesser horseshoe bat)</li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>The extent and distribution of qualifying natural habitats and habitats of qualifying species</li> <li>The structure and function (including typical species) of qualifying natural habitats</li> <li>The structure and function of the habitats of qualifying species</li> <li>The supporting processes on which qualifying natural habitats and habitats of qualifying species rely</li> <li>The populations of qualifying species, and,</li> <li>The distribution of qualifying species within the site.</li> </ul>	<p><u>Habitat Management</u> Maintenance of foraging and commuting linkage habitat.</p> <p><u>Habitat Loss</u> Habitat fragmentation resulting in loss of connectivity for foraging and commuting.</p> <p>Direct loss of roost sites.</p> <p><u>Air Quality</u> Eutrophication or acidification could lead to successional vegetation change.</p>

***West of England Joint Spatial Plan  
Development Plan Document  
Publication Draft***

***Report of Engagement and Main  
Issues Raised***

*October 2017*

### Report of Engagement and Main Issues:

#### 1.0 Introduction, purpose and context

1.1 This statement has been produced in support of the West of England Joint Spatial Plan DPD Publication draft. It outlines how the 4 Unitary Authorities of Bristol, Bath & North East Somerset, North Somerset and South Gloucestershire have sought participation from communities and stakeholders during the preparation of this Plan, the main issues raised through the public engagement undertaken and how these issues have been taken into account. It covers the period from November 2015 – September 2017 and addresses the following in accordance with the Town & Country Planning (Local Planning) (England) Regulations 2012 – Reg. 22 (1) (C) (i-iv):

- Which bodies and persons were invited to make comments;
- How those bodies and persons were invited to make comments;
- A summary of the main issues raised; and
- How the 4 Councils have taken comments made into account.

1.2 The report provides an update from the two previous Consultation Reports prepared; the JSP Issues and Options consultation in November 2015 to January 2016 and the JSP Towards the Emerging Spatial Strategy November 2016 to December 2017. These documents can be viewed <https://www.jointplanningwofe.org.uk/consult.ti/JSPEmergingSpatialStrategy/consultationHome> and, together with this report, provides a full summary of the consultation and engagement, main issues raised and the 4 Council's response throughout the duration of the plan's preparation.

1.3. This report deals with the engagement activities in Part 1 and the main issues arising and how the Councils have responded to them in Part 2.

## Appendix E

### Part 1: Engagement undertaken as part of Regulation 18 consultations

This section of the report sets out the key activities which have taken place up to September 2017. It does not list all the informal conversations, meetings and correspondence. This consultation and engagement has been carried out in accordance with Regulations of the Town and Country Planning (Local Planning) (England) Regulations 2012. This has been undertaken in accordance with the 4 Council's adopted Statements of Community Involvement (SCI).

#### Compliance with the Duty to Co-operate (DtC)

Through the creation of the JSP and the method of joint working the 4 Councils are able to demonstrate that the legal obligation of co-operation on strategic matters is satisfied. This report also serves to detail the ongoing engagement with our DtC contacts which has continued to take place in support of the preparation of the Joint Spatial Plan for the West of England.

#### Key consultation milestones in the Plan's preparation

The table below demonstrates an overview of all the key consultation milestones in the Plan's preparation to date. Previous key engagement on the plan (November 2016 to December 2017) can be viewed in more detail within JSP Towards the Emerging Spatial Strategy and Transport Vision Consultation Report March 2017 which can be accessed [https://www.jointplanningwofe.org.uk/gf2.ti/-/756738/25692261.1/PDF/-/Joint\\_Spatial\\_Plan\\_and\\_Transport\\_Study\\_Consultation\\_Report.pdf](https://www.jointplanningwofe.org.uk/gf2.ti/-/756738/25692261.1/PDF/-/Joint_Spatial_Plan_and_Transport_Study_Consultation_Report.pdf)

Date	Activity
January 2015	Publication of JSP Pre-Commencement Document
January 2015	Emails and letters sent out to everyone on the 4 Council's Local Plan databases (approx. 10,000 names) informing them of the start of the Plan's preparation, the purpose of the JSP.
March 2016	Publication of the responses made to the JSP Pre-Commencement Document and West of England response to matters raised.
November 2015	JSP Issues and Options Launch event held at University of West of England
November 2015	Emails and letters sent out to everyone on the 4 Council's Local Plan databases (approx. 10,000 names) informing them of the start of the Plan's Issues and Options consultation.
November 2015	Town and Parish Council, MP and Joint Forum Briefings
November 2015 to January 2016 Regulation 18 consultation offline and Online channels utilised during the consultation comprising	Series of exhibitions and drop in events held across the West of England to promote and publicise the JSP Issues and Options.  Single website for all consultation documents and redirects from each UAs websites  Supporting documents, collateral and materials to facilitate greater engagements.

## Appendix E

	<p>Social media channels including Facebook and Twitter to promote the consultation and regional exhibition events Press releases issued on behalf of the 4 Councils and media coverage on TV and radio channels to raise awareness, encourage responses and allow people to participate.</p> <p>Heads of Planning Policy presented to an audience at the University of the West of England – January 2016, to engage the younger communities of the West of England in the Joint Spatial Plan process.</p>
May 2016	Letters to Neighbouring Authorities to understand the opportunities through the Duty to Cooperate to work with neighbouring authorities in order to meet some of the wider Bristol housing need should the evidence show that we are unable to meet it in full.
June 2016	Louise Fradd and, Directors of Development and Heads of Planning from the four unitary authorities met with Business West – June 2016
August 2016	Letter to the Strategic Solutions Panel including key government departments; the Environment Agency, Natural England, WENP, HCA and key infrastructure providers for the region) seeking to re-affirm our commitment to engage effectively with stakeholders and organisations and ask for feedback on the previous consultation process.
November 2016	JSP Towards the Emerging Spatial Strategy launch event held at Watershed Bristol
November to January 2017 Regulation 18 consultation offline and Online channels utilised during the consultation comprising	<p>Four themed workshops across the West of England region held with targeted stakeholder audiences to discuss the key issues in the JSP.</p> <p>Six business consultation events were held with the support of Business West</p> <p>Bristol Avon Catchment Partnership briefed at meeting held on 30<sup>th</sup> November</p> <p>15 local consultation drop in sessions were held across the West of England</p> <p>Single website for all consultation documents and redirects from each UAs websites <a href="http://www.jointplanningwofe.org">www.jointplanningwofe.org</a> Supporting documents, collateral and materials to facilitate greater engagements – summary flyer, Frequently asked</p>

## Appendix E

	<p>questions, Office banners, posters to promote regional location drop in events</p> <p>An audience friendly illustrative video explaining the JSP Social media channels including Facebook and Twitter to promote the consultation and regional exhibition events</p> <p>Press releases issued on behalf of the 4 Councils and media coverage on TV and radio channels to raise awareness, encourage responses and allow people to participate.</p> <p>Written comments invited from statutory providers e.g. Wessex water, Bristol water, Western Power as part of Emerging Spatial Strategy consultation</p>
April 2017 onwards	<p>Officers from the JSP technical teams provide an update on the incorporation of Green Infrastructure within the JSP. Invited officers were from; Environment Agency, Natural England, Wessex Water, the Local Nature Partnership and Avon Wildlife Trust.</p> <p>Fortnightly meeting with the West of England Local Nature Partnership to discuss delivery of green infrastructure frameworks for the JSP</p> <p>Meeting Natural England officers to discuss the Habitat Regulation Assessment (HRA): Officers have met with Amanda Grundy and Simon Stonehouse to review the HRA process for the JSP throughout 2017 as we prepared the regulation19 Plan. Natural England have also been in communication with the local authorities throughout the plan process.</p>
May 2017	<p>Resilience Adaption workshop held 8<sup>th</sup> May 2017: Invited members of the key infrastructure provides for the region. This meeting was coordinated and chaired by Wessex Water to review issues of water and environmental resilience and the implications of the JSP.</p>
May/June 2017	<p>Specific WoE Affordable Housing stakeholder consultation via survey, building on research carried out by Bristol CC and National Housing Federation in Autumn 2016, resulting in high level assessment of capacity and appetite of Registered Providers to deliver Affordable Housing within the JSP period.</p>
June 2017	<p>Strategic Solutions Panel meeting held 29<sup>th</sup> June 2017:</p>

## Appendix E

	A presentation and series of round table discussions held to review the Emerging JSP policies with key stakeholder organisations.
June 2017	Meeting with digital infrastructure providers – VirginMedia, Hyperoptics and Openreach to discuss delivery of services when providing for large housing and employment sites
July 2017	Further written consultation with statutory providers e.g. Bristol Water, Wessex Water, Western Power, Wales and West Utilities regarding emerging SDL locations and capacities.
September 2017	Bristol Avon Catchment Partnership meeting held 12 <sup>th</sup> September 2017. Officers from the Joint Spatial Plan team attended this meeting to provide an update on progress and discuss key environmental issues across the region
September 2017	TPCA hosted bespoke workshop for 4 Councils entitled ' <i>How can Councils secure the delivery of more affordable homes? New models, partnerships and innovation.</i> ' The session was held to run through the findings of TPCA nationwide project to understand new innovation in address housing need and facilitate a discussion about how new approaches identified could be relevant in the West of England.

### **PART 2: 6.0 Summary of Main Issues Arising from Regulation 18 Consultation**

This section sets out the main issues raised through consultation on the 2016 Towards the Emerging Spatial Strategy and how these have been used to inform the preparation of the JSP Regulation 19 Publication Plan. In total over 1,500 people representing a wide range of stakeholder groups responded. A more detailed report setting out the consultation responses is contained at pages 30 – 122 of the JSP Towards the Emerging Spatial Strategy and Transport Vision Consultation Report March 2017.

The statement below is a summary of how the questions appeared within the Plan and covers the following:

- Number of respondents to policy;
- Main issues raised;
- How main issues raised have been taken into account by the Council in preparing the 2017 Proposed Submission JSP Plan

#### **Question 1 Does the proposed strategy make adequate provision to address the housing needs of the West of England?**

765 people responded to this question.

## Appendix E

The majority of respondents felt the number of homes planned for was adequate, this view was mostly expressed by residents (80% of those that responded), local companies/organisations, local interest groups, development sector respondents and parish/town Councils. The majority of local residents considered the housing needs to have been over estimated but several respondents considered not enough housing was proposed. These respondents were largely from the development sector and business community and their comments included that an uplift in housing numbers is required to meet housing needs and in order to have an impact on overall levels of affordability.

### **How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan**

The assessment of need remains robust and is accordance with national guidelines. In light of the identified need, and the comments received, the provision of housing in the Plan has been reviewed. The 4 UAs have concluded that the strategy not only makes provision to meet the assessed need but also provides flexibility to facilitate delivery. Furthermore, a contingency has also been identified if it becomes evident at review that there has been under delivery. Whilst seeking to plan positively and boost the supply of housing, the strategy enables annual delivery rates to be increased by over a third from around 4,000 to 5,127 homes pa, the 4 UAs have been careful to plan for sustainable development, recognising the high quality environment and the need to take account of national Green Belt policy.

### **Question 2 How can we increase the delivery of homes, in particular much needed affordable homes in the West of England?**

Over 700 responses were made to this question

There was acknowledgement of the agreed need for Affordable Housing (AH) as a critical issue and the need to build more AH for young people. Several developers also considered the affordable housing target should be higher, other comments and suggestions on delivery of affordable housing included:

- Enforce a minimum target on a region wide basis to ensure the Affordable Housing need of 32,200 dwellings is delivered.
- Only grant permission where the target AH % is agreed
- Affordable housing requirements must be enforced and developers should not be Allowed to renegotiate provision once permission has been granted;
- The councils should be proactive in challenging viability assessments to ensure that planned levels of affordable housing are achieved.
- The Plan should identify potential ways in which the demand for affordable homes can be met;
- There should be development of homes by public bodies;
- Authority owned land should be used solely for affordable housing.



## Appendix E

- The need for affordable rental housing;
- The need for such homes to be high quality and energy efficient.

Most comments (170 responses) suggested reviewing the ways in which the planning process could be utilised and/or amended. Responses to enhance the process included:

- Speeding the planning process up through new policy in the JSP
- Adding a Planning Policy context for the delivery of 'garden villages' considered as capable of delivering housing at high delivery rates.
- The need for developers to set delivery rates.
- Promoting benefits for developers to develop their sites at an increased rate.
- Imposing penalties for failure to deliver
- Focus development in areas where infrastructure investment is already taking place
- Enforcement of planning agreements
- Supported a more diverse mix of development opportunities
- Making better use of existing empty dwellings.
- Addressing the 5-year supply issue,
- Innovative construction solutions (e.g. modular housing) which can be built quickly and efficiently.
- Potential new funding options from the devolution deal

### **How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan**

The SHMA evidences a need of 32,200 affordable homes in the West of England in the period 2016-2036. This equates to 31.5% of the total housing requirement of 102,200 dwellings, and an annual requirement of 1,610 affordable homes. Of the 32,200 affordable homes needed, 29,100 are required in the Wider Bristol Housing Market Area and 3,100 in the B&NES Housing Market Area.

The JSP Towards the Emerging Spatial Strategy (TESS) November 2016 recognised the challenge involved in achieving provision to meet this level of need and estimated that some 17,100 traditional Affordable Homes (53%) could be delivered through the planning system against this level of housing need.

This position and the options available to address this were set out in the Officer response to the TESS document

In preparing the Publication Plan and in response to the comments raised, the 4 Councils have focused on two key issues;

- a) the need to substantially increase the overall supply of affordable housing from all sources due to the high level of need for Affordable Housing and the shortfall in past delivery rates,
- b) the spatial disproportionality of affordable housing needs to address the issue that majority of the Affordable Housing need is derived from Bristol, however this

## Appendix E

cannot be provided within Bristol because the scale of the need is too great, the availability of suitable sites is limited, and many residential sites in Bristol have high redevelopment costs due to their brownfield status.

Whilst it is recognised that the identified need for Affordable Housing has not been fully met, the strategy has been to entail a substantial boost in the supply of Affordable Housing for the sub-region and to achieve a step change in provision.

This is given policy framework expression in JSP Policy 3 of the JSP Publication Plan which focuses on:

- i. establishing the Affordable Housing Target of 24,500 net new affordable dwellings for 2016-2016.
- ii. maximising the provision of Affordable Housing as far as possible, making it a priority in the formulation of the spatial strategy.
- iii. in light of the particularly substantial need for Affordable Housing in Bristol, the provision of Affordable Housing on the SDLs and other strategic locations within or well-related to the Bristol urban area must contribute to the affordable housing needs of Bristol via on-site provision with the option of off-site contributions in locations less-well related to Bristol.
- iv. Delivery mechanisms will be determined through Supplementary Planning Document(s).

In preparing the JSP it has also been recognised that in order to maximise the delivery of Affordable Housing the four Councils continue to work proactively together and with partners to explore other mechanisms and opportunities in addition to the planning system.

### **Question 3 Does the proposed strategy make adequate provision to address the economic and employment needs of the West of England?**

Over 600 responses to this question were received.

Multiple responses (75 comments) agreed the Emerging Spatial Plan makes adequate provision to address economic and employment needs. Reasons for agreement included:

- Recognition of the alignment with the Strategic Economic Plan (SEP), and focus on the Enterprise Zones and Areas and South Bristol.
- Rebalancing of employment growth away from the communities in the North Fringe of Bristol was welcomed in helping to address inequality issues in South Bristol.
- Emphasis on urban living may result in the loss of existing employment sites.

The majority of responses (338) disagreed that the Emerging Spatial Plan makes adequate provisions to address economic and employment needs and suggested that the employment offer was limited locally. Additional comments and challenges to the employment strategy included:

## Appendix E

- Lack of employment opportunities in areas proposed for housing
- That the strategy does not address the longstanding economic problems in South Bristol and Weston-super-Mare by focusing investment in both employment and housing in these areas.
- It does not accommodate the economic growth objectives of the Local Enterprise Partnership Strategic Economic Plan (SEP).
- Views that key businesses in the area need to be formally recognised.
- The plan focused more on housing instead of employment opportunities.

### **How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan**

The Economic Development Needs Assessment (EDNA) provides evidence that there is existing employment land sufficient to deliver strategic employment needs and the anticipated jobs growth over the period to 2036.

Comments submitted on the distribution and availability of employment land for development have been noted and the 4 Councils have responded by the inclusion of direct reference to the role and strategic significance of:

- a) existing town and city centres
- b) Enterprise Zones and Areas

In providing for employment growth and additional growth opportunities at key infrastructure locations:

- c) the Port, Airport and Oldbury new nuclear power station

Where appropriate, and in relation to scale of development and existing employment provision, the new Strategic Development Locations will also make provision for employment land.

Note that the Local Plans will continue to make provision for employment in local town, district and business centres.

Topic paper x Employment provides further evidence on this issue.

### **Question 4 Does the preferred strategy and the locations identified meet the plans strategic priorities and vision?**

There was support for the Vision, the Strategic Priorities and their spatial implications from a number of development sector bodies and government agencies, but with some caveats.

Some respondents considered certain proposed Strategic Development Locations to be unsustainable and contrary to the strategic priorities and vision set out in the Emerging Spatial Strategy. Some respondents stated that the Vision did not highlight the need to

## Appendix E

address service and infrastructure requirements or recognise the importance of smaller sites in delivering the whole Vision for the JSP.

### **How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan**

There were a wide range of stakeholder viewpoints, which is evidence that there was not a consensus view on what the Vision or plan priorities should be. However, the comments received have been taken into account and used to make adjustments to the Plan's critical issues and strategic priorities.

These are now presented in a table format in the Publication Plan which emphasises a commitment to set out a policy framework that addresses the following:

- To substantially boost the housing supply, particularly affordable housing of which the need is acute, across the Plan area by establishing an overall housing and affordable housing requirement to be delivered in accordance with the Plan's spatial strategy.
- To promote inclusive economic growth which accommodates the economic growth objectives of the LEP Strategic Economic Plan in accordance with the Plan's spatial strategy and thereby ensures that benefits of economic growth are shared more equally.
- To promote sustainable growth the form and function of development should not seek to replicate past patterns of development and settlement patterns that are over-reliant on the private car and should be properly aligned with infrastructure and maximise opportunities for sustainable and active travel.
- Through a place making approach promote places of density and scale with a range of facilities, which integrates high quality multi-functional green infrastructure which encourages healthy lifestyles, cultural wellbeing and ensures resilience to the impacts of climate change.
- Delivering economic growth needs to be balanced with recognising that the sub-region benefits from a world class environment. This brings substantial economic and community benefits and contributes to the quality of life of residents, visitors and businesses by enhancing the quality of the natural, built and historic environment and achieving biodiversity gains which are recognised as outcomes as part of achieving sustainable patterns of development.

### **Question 5 Are there any reasons why this strategy or identified locations could not be delivered?**

Approximately 1,400 respondents answered this question.

Many comments on the Strategic Development Locations were strongly steered towards transport issues. Responses on this included:

## Appendix E

- Houses need to be located in locations where infrastructure is in place to support development
- The JSP should choose locations with good transport links to employment opportunities.
- Impact on the environment
- References to other infrastructure:
  - Potential pressures added to local schools, hospitals and GP surgeries, which are currently inadequate to support the population and creating an issues for delivery of Strategic Development Locations (SDLs).
  - The need to spread development over more SDLs increasing delivery as fewer 'major' infrastructure improvements would be required.

A further 100 locations were put forward through the call for sites exercise that supported the JSP consultation. From the sites submitted, the majority of these were new and some were resubmitted by respondents from the previous issues and options consultation. These will be considered as part of the next round of technical work to support the preparation of the draft JSP.

In relation to the SDLs it should be noted that the responses were influenced by the interests of those responding. Within consultations of this nature, it is anticipated that the views are not wholly representative of the population and residents of these areas may react more negatively and promote alternative spatial options, in contrast to residents in areas that are not identified for development who are less likely to respond. Furthermore the development industry may promote sites that they own or control and may not provide a balanced view of the location as part of a comprehensive joint spatial strategy.

**Green Belt:** Views on this subject were mixed, several comments (60 responses) specifically outlined that Green Belt land should not be used however, various comments (50 responses) outlined the need to use more Green Belt land. Respondents from the development sector considered that a Green Belt Review is required and should consider appropriate releases of Green Belt land in and around sustainable settlements, including consideration of the inseting of settlements. Several respondents also raised the issue of Green Belt exchange in relation to development on the edge of Bristol.

### **How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan**

The clear message from the consultation, particularly from our communities, was that it was essential that new development was delivered in step with the necessary infrastructure, particularly transport improvements. This is identified as a key element in the Publication version's proposed vision for the West of England and the principle integrated throughout the plan. In particular, the strategic infrastructure requirements policy sets out the broad principles with reference to the role of the Joint Infrastructure

Delivery Programme and the Local Transport Plan in supporting delivery, while the specific SDL policies identify specific infrastructure requirements.

The potential development sites submitted were assessed and informed the evolution of the preferred spatial strategy through the two stages of consultation. The Issues and Options considered broad options which were refined through the Towards the Emerging Spatial Strategy Document. The latter also invited comments on alternative locations not proposed for inclusion in the Plan. For the majority of the proposed locations the development industry response provided reassurance that the SDLs were realistic and deliverable and that they could be taken forward into the Publication version. This engagement with developers and landowners helped to inform the detailed policies proposed for each SDL. The overall conclusion from the consultation was that the JSP needed to present a range of different development opportunities of different types and in a variety of locations to provide flexibility and choice across the plan area.

The Green Belt issue divided opinion with views strongly made in support and against both in respect of affected communities and developers promoting land. This debate has helped to inform the JSP spatial strategy. This maintains the importance and value of the Green Belt as a whole, whilst recognising that exceptional circumstances have been made to warrant land to be released from the Green Belt to support sustainable growth in some specific locations.

### **Question 6 Is the preferred spatial strategy the most appropriate strategy when considered against the reasonable alternatives?**

Over 800 respondents answered this question.

Over half of the respondents thought the Emerging Spatial Strategy presented in this consultation was not the most appropriate strategy or that they had reservations about the strategy. Many of these were in respect of one or more of the strategic development locations as opposed to the overall strategy. Some (70) respondents were in agreement that the preferred spatial strategy was the most appropriate, albeit some with reservations. As noted above some views were clearly influenced by the interests of those responding and by a specific strategic development location as opposed to how the Emerging Spatial Strategy performs as a whole.

The majority of respondents considered there were reasons why the strategy could not (or should not) be delivered. The most common general reasons given for the strategy being considered undeliverable included:

- The resulting pressure on transport infrastructure (mentioned approx 1000 times), including that the necessary transport infrastructure is undeliverable
- Pressure on other infrastructure (mentioned over 700 times).

## Appendix E

- An unsustainable strategy (raised nearly 350 times) i.e. would not meet the tests of environmental, and/or economic and/or social sustainability.

### **How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan**

The formulation of and justification for the preferred spatial strategy is set out in Topic Paper 2 and is summarised in the JSP. This explains how the 4 UAs have assessed the evidence and sought to formulate the most appropriate strategy to achieve the agreed priorities. Development is steered to locations which minimise the harm to the environment whilst providing scope for enhancement, and which provide a deliverable strategy. In light of the concerns expressed about delivery of the transport infrastructure needed, particular effort has been directed to ensuring its deliverability, both technically and its funding.

The preferred spatial strategy reflects the need to find as balance; it enables the identified growth needs of the West of England to be met in a sustainable and deliverable way, properly aligned with new infrastructure and with flexibility. It enables the retention and enhancement of the sub-region's high quality environment, provides benefits to existing communities and it facilitates the development of exemplar, sustainable new places. This is the most appropriate strategy for the West of England as evidenced through Sustainability Appraisal (SA) testing and in delivering the Plan's spatial priorities.

## JOINT SPATIAL PLAN TOPIC PAPER 1 FORMULATION OF THE HOUSING REQUIREMENT V.1

### 1.0 CONTEXT

#### Introduction

- 1.1 The West of England Joint Spatial Plan (JSP) Development Plan Document (DPD) has a purposefully constrained scope, essentially to address the housing, employment and infrastructure needs of the West of England (WoE) sub-region. This paper sets out how the housing needs of the sub-region have been assessed for the purposes of the JSP, how the Housing Requirement for the plan has been derived, for both Market and Affordable Housing. Topic Paper 2 deals with how the four West of England Unitary Authorities (UAs) have responded to this need in formulating the spatial strategy.

#### National Policy

- 1.2 Based in the current guidance in NPPF and in the NPPG, the requirements on the UAs in regard to housing needs are, in summary;

Para 14: *to meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.*

Para 47 *to boost significantly the supply of housing by ensuring that they meet the full, objectively assessed needs for market and affordable housing in the housing market area (HMA).*

Para 159: *to prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs. The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*

- *meets household and population projections, taking account of migration and demographic change;*
- *addresses the need for all types of housing, including affordable housing, the needs of different groups in the community eg families,*



*older people, people with disabilities, service families and self-build;  
and*

- *caters for housing demand and the scale of housing supply necessary to meet this demand.*

- 1.3 The NPPG provides more detail on assuming housing need, stating that “*the assessment of needs is an objective assessment based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints.*”
- 1.4 In September 2017, the Government published consultation on a new standard methodology for the assessment of housing need entitled “*Planning for the right homes in the right places*”. This addresses the overall need for housing but not affordable housing or the other components of housing need.
- 1.5 In the consultation paper, the Government has proposed transitional arrangements to set a period of time before which plans would be expected to use the new method for calculating the local housing need. This includes that if the Plan will be submitted for examination on or before 31 March 2018 or before the revised Framework is published, whichever is later, it should continue to be examined and rely on evidence prepared using the current method. The JSP is programmed to be submitted before 31<sup>st</sup> March 2018 and therefore, under the transitional arrangements, the new methodology will not apply.
- 1.6 Based on the Government’s proposal that there should be a single assessment of housing need (Planning for the right homes in the right places: consultation proposals 2017); and the emerging 2 tier plan approach (Housing White Paper paras A16 & 17) and the requirements in the Town and Country Planning Regulations 2012 (s8)(5) that the policies contained in a local plan must be consistent with the adopted development plan; the housing requirements established in the JSP will apply to the UA local Plans, and the new standard methodology will not apply.

#### **The role of the JSP**

- 1.7 In preparing the JSP therefore, an assessment has been made of;
- The extent of the Housing Market Areas (HMAs) in the sub-region, and
  - the objectively assessed needs (OAN) for market and affordable housing in the HMAs (the “policy-off” assessment)
  - Other requirements to facilitate delivery and formulate the Housing Requirement (the “policy-on” assessment).

1.8 The role of the JSP is to address the overall quantum of housing need and the Affordable Housing need. It is the role of the UAs in the Local Development Frameworks to address the more detailed breakdown of housing needs referred to in para 159 of the PPG, including the needs of the travelling community and students.

1.9 The primary evidence base for the assessment of JSP housing need constitutes;

- The Wider Bristol Area Strategic Housing Market Assessment (SHMA) parts 1 & 2
- The Bath Area SHMA
- West of England Housing Target (September 2016).

### Past Delivery

1.10 Past housing delivery rates in the West of England are set out in Diagram 1. This shows that the annual average delivery rates for the West of England have been around 4,150 dgs p/a between 2006 & 2017

**Diagram 1 - WoE Housing Delivery 2006 to 2017**

	2006 /07	2007 /08	2008 /09	2009 /10	2010 /11	2011 /12	2012 /13	2013 /14	2014/ 15	2015/16	2016/17	2006-2017
<b>BCC</b>	2,052	2,428	2,574	2,189	1,739	1,746	878	1,287	1,454	1539	1994	19,880
<b>NSC</b>	1,132	1,474	935	772	637	515	527	760	674	569	852	8847
<b>SGC</b>	689	1,003	916	742	714	923	823	1,095	1,224	1107	1630	10,866
<b>B&amp;NES</b>	334	557	386	470	413	463	550	537	667	809	853	6,039
<b>WoE</b>	4207	5462	4811	4173	3503	3647	2778	3679	4019	4024	5329	45,632

1.11 On Affordable Housing in the 11-year period 2006 – 2017, delivery was only 22% against targets of between 30% - 40%.

**Diagram 2 - WoE Affordable Housing Delivery 2006 to 2017**

	2006 /7	2007 /8	2008 /9	2009/ 10	2010/ 11	2011 /12	2012 /13	2013 /14	2014/ 15	2015 /16	2016/ 17	2006-2017
<b>B&amp;NES</b>	106	80	65	93	-14	244	137	120	185	178	166	1,360
<b>BCC</b>	488	443	583	553	402	365	290	102	240	180	199	3,845
<b>NSC</b>	126	192	266	149	110	42	211	166	154	126	138	1,680
<b>SGC</b>	75	215	291	281	340	269	223	298	326	263	360	2,941
<b>WoE</b>	<b>795</b>	<b>930</b>	<b>1205</b>	<b>1076</b>	<b>838</b>	<b>920</b>	<b>861</b>	<b>686</b>	<b>905</b>	<b>747</b>	<b>863</b>	<b>9,826</b>

## 2.0 THE EVIDENCE (The 'policy-off' Assessment of need)

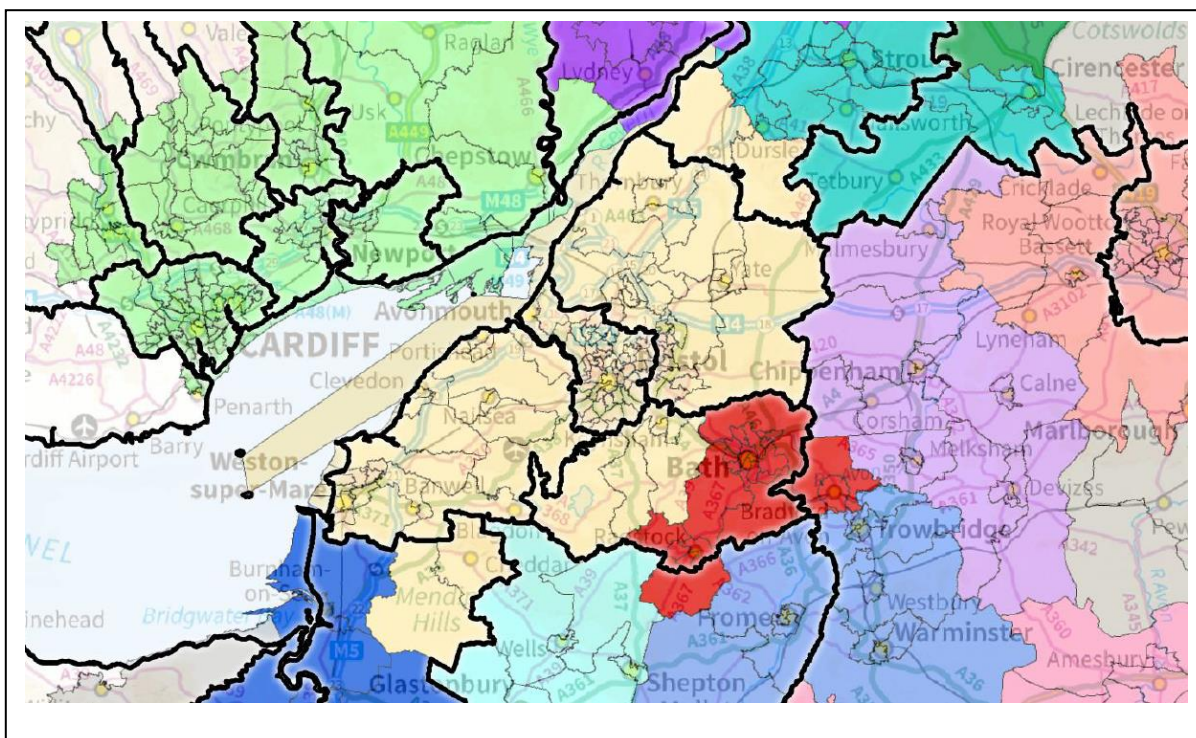
### The SHMA Methodology

- 2.1 The assessment of housing need was undertaken by Opinion Research Services (ORS) for the four UAs. The SHMAs were prepared accordance with the NPPF and PPG and published in 2015. An update was published in September 2016.

### Housing Market Areas

- 2.2 The SHMA identifies two HMAS in WoE, one for [the Wider Bristol Area](#) covering Bristol City, North Somerset, South Gloucestershire and limited parts of adjoining districts. It consists of two volumes; and one for Bath covering the eastern parts of the District and limited parts of adjoining districts. The HMAS are shown in Diagram 3 below. Whilst the Actual HMAS cut across District boundaries, the SHMA recommends that for statistical reasons, the proxy for the Wider Bristol HMA comprises the districts of Bristol, South Gloucestershire and North Somerset whereas the Bath HMA comprises the district of B&NES (see Diagram 3b).

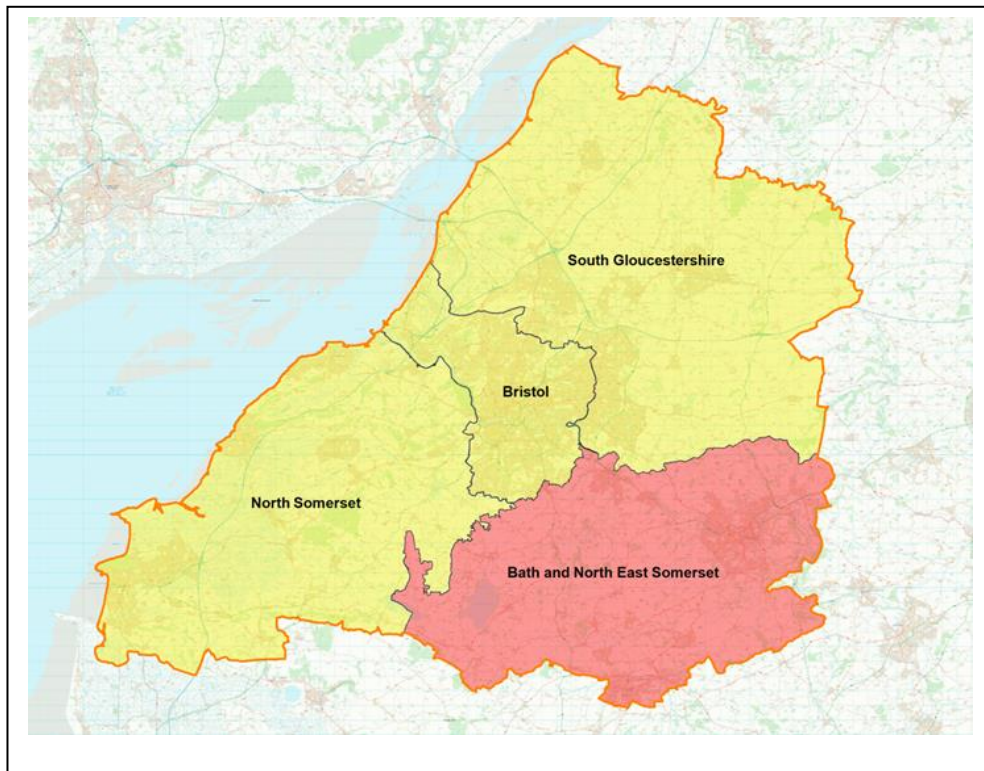
**Diagram 3a: The Actual Housing Market Areas in WoE**



### The Objectively Assessed Need (OAN)

2.3 The ORS methodology for assessing housing need is described in the SHMA, (see section 3 of the SHMA), and the outputs are summarised in Diagram 4 below which is an extract from the SHMAs update document “West of England Housing Target” September 2016.

***Diagram 3b: The Proxy Housing Market Areas in WoE***



***Diagram 4: Establishing the Housing Target***

Stage		Wider Bristol HMA	Bath HMA	TOTAL
Housing need based on SHMA household projections		78,500	9,300	87,800
Estimated impact of...	Changes to migration	+800	+2,300	+3,100
	Changes to average household size	-2,000	-500	-2,500
Housing need based on updated household projections		77,300	11,100	88,400
Further adjustments needed...	In response to balancing jobs and workers Additional dwellings to ensure alignment between planned jobs growth and projected growth in workers	0	400	400
	In response to market signals Dwellings needed (including the specific adjustment for concealed families and homeless households)	10% x 77,300 = 7,700	15% x 11,100 = 1,700	9,400
Combined impact of the identified adjustments		7,700	1,700	9,400
<b>Updated OAN for the JSP period 2016-36</b>		<b>85,000</b>	<b>12,800</b>	<b>97,800</b>
Allowance for dwellings assumed to be vacated by older people moving into care		3,700	700	4,400
Further uplift to help deliver the identified affordable housing need		The uplift applied in response to market signals will already incorporate this		
<b>Housing Target for the JSP period 2016-36</b>		<b>88,700</b>	<b>13,500</b>	<b>102,200</b>

2.4 Working through its methodology, the SHMA proposes an OAN of 85,000 dgs for the Wider Bristol HMA (WBA) & 12,800 dgs for the B&NES HMA, making a total of 97,800 dgs needed for the sub-region by 2036. This has taken account of demographic projections adjusted for local circumstances, ensuring there will be enough workers for planned jobs, and an adjustment for market signals, 10% for WBA and 15% for B&NES in light of the higher wages to house price ratio.

#### The overall Housing Target

2.5 An allowance has then been made for dwellings assumed to be vacated by older people moving into care for both HMAs. In response to the NPPG, (Para 029) consideration was given to further increasing overall housing supply to help deliver the affordable housing need but no further additional uplift was considered appropriate (see Annex 1). The overall conclusion is that a Housing Target of 102,200 new dwellings is needed between 2016 and 2036. This is the “policy-off” evidenced need or Housing Target which the JSP should seek to deliver. The need for Affordable Housing is considered in more detail below (see from para 2.7).

2.6 The economic growth aspirations of the sub-region are set out in the Strategic Economic Plan (or the SEP) and have been used to inform the JSP. The four UAs are aware of the uncertainties in economic forecasting, made more difficult by Brexit, but

until further information is available, it is premature to attempt to take account of the implications of Brexit.

**Affordable Housing Need**

- 2.7 The SHMA evidences a need of 32,200 affordable homes in the West of England in the period 2016-2036. This equates to 31.5% of the total housing requirement of 102,200 dwellings, and an annual requirement of 1,610 affordable homes. Of the 32,200 affordable homes needed, 29,100 dgs are required in Wider Bristol and 3,100 in B&NES.
- 2.8 The SHMA uses national policy and guidance for the definition of affordable housing and has regard to local incomes, house prices and rents in arriving at 32,200 figure.
- 2.9 The four authorities continue to review current and emerging housing products against NPPF definition for Affordable Housing and against local affordability in relation to incomes and housing costs. Any need for products which are not affordable locally have not been included within the 32,200 dg figure.

2.10 The SHMA for Wider Bristol (Vol2) states at para 2.33:

*‘There may also be a role for LCHO products at higher equity shares targeted at households able to afford private rent but unable to afford home ownership. This would help ‘widen opportunities for home ownership’ (NPPF para 50) but would be in addition to the need to deliver 29,100 affordable homes in the Wider Bristol HMA’.*

- 2.11 The breakdown of affordable housing need by tenure type has been based on the assumption that up to 35% of gross household income (excluding housing benefit) is available for housing costs.
- 2.12 The need for affordable housing breaks down between the UAs as follows:

**Diagram 5: Breakdown of Affordable Housing need by UA**

UA	Affordable Housing need 2016-2036
B&NES	3,100
Bristol	18,800

North Somerset	4,800
South Gloucestershire	5,500
<b>West of England</b>	<b>32,200</b>

2.13 In conclusion there are 2 key issues that the JSP needs to respond to for the WoE with regard to affordable housing need evidence;

- a) the need to substantially increase the overall supply of affordable housing above past delivery rates
- b) the spatial disproportionality of affordable housing need.

**Other components of need**

2.14 The SHMAs, with updates, explain (see para 6.17 onwards of the WBA SHMA) that the Housing Target includes other components of housing need such as students, older people and the travelling community these households are counted as a component of, and not additional to, the figure identified by the SHMA. In light of the defined remit of the JSP it will be the role of the UA Local Plans to provide the policy response in order to address these more specific components of housing need.



### **3.0 THE HOUSING REQUIREMENT “POLICY ON”**

#### **The Housing Requirement**

- 3.1 The evidence-based need for housing, (the Housing Target) is 102,200 new dgs by 2036. The Housing Requirement is the ‘Policy-on figure’, ie the number of dwellings that the JSP seeks to deliver having taken into account other policy issues and evidence. In particular para 14 of the NPPF requires that objectively assessed needs must be met;
- with sufficient flexibility to adapt to rapid change, or
  - unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits
- 3.2 Topic Paper 2 on the Spatial Strategy shows that whilst it is a significant challenge in seeking to meet the Housing Target of 102,200 dg, the impacts of doing so would not significantly and demonstrably outweigh the benefits in the West of England. Furthermore, in light of the advice in NPPF para 14, the JSP seeks to provide flexibility by increasing the OAN between 5% to 10% ie around 105,500 new dwellings or around 7.5%. This is in addition to the flexibility in Five year Housing land supply evidenced in Topic Paper 2 on the Spatial Strategy. The locations comprising the supply of 105,500 dwellings represent the most appropriate strategy for the sub-region.
- 3.3 Furthermore, in the interests of delivery, the four UAs have included in the strategy a housing contingency of around 3,000 dgs. In the event that any of the preferred components of planned supply do not come forward, the contingency could be brought forward as a ‘Plan-B.’ This would entail a revision of the plan as part of the first review to ensure that these are still an appropriate contingency. The contingency is described in more detail in the Spatial Strategy Topic Paper.
- 3.4 Therefore the policy-on Housing Requirement for the JSP entails a significant boost to the supply of housing of 102,200 net new dwellings to be delivered between 2016 and 2036 with flexibility taking overall supply to 105,500 dwellings, supported by a further contingency of around 3,000 dwellings if needed, taking potential overall supply to around 10% above the OAN of 97,800 homes.

#### **Alternative Housing Requirement proposals**

- 3.5 Through the process of Plan preparation, a number of alternative, higher Housing Requirements have been proposed. The UAs have considered these but maintain the SHMAs undertaken for the UAs remains robust.

### **The Affordable Housing Target**

- 3.6 Meeting the full affordable housing need is a significant challenge. This is not unique to the West of England; the nature and scale of issues and policy landscape is national.

#### ***The Delivery challenge***

- 3.7 The factors that have and will continue to impact on delivery levels include:
- Changes to national policy and guidance;
    - increased thresholds – from November 2014, sites of 10 units or fewer are not required to deliver Affordable Housing
    - introduction of Vacant Building Credit – reduced Affordable Housing requirement on any site with a vacant existing building
    - sites developed under permitted development rights do not require Affordable Housing, including office to residential schemes
    - no Affordable Housing on sites for student accommodation or Extra-Care developed under Use Class C2
    - introduction of products that are NPPF-compliant but do not meet local affordability criteria, such as starter homes costing 80% of open market value
  - Market conditions, particularly in urban areas
    - Viability claims, particularly on brownfield sites, and impact of existing and alternative use value and infrastructure requirements
    - Regeneration schemes that can achieve densification by making better use of existing sites but have the effect of reducing the number of Affordable Homes because the number demolished is greater than the number of new Affordable Homes provided as part of a mixed-tenure development.
  - Deliverability
    - Some locations are less attractive to Registered Providers (RPs) and other delivery partners
    - Retirement homes provided in flatted complexes often carry inherent delivery and management issues that result in off-site sums being accepted in lieu of on-site delivery
    - Specific locational issues such as rural sites, sites with restricted access, one-off landowner developments.

Although some sites are developed by RP partners at a higher % of Affordable Housing using grant funding or other subsidy and this goes some way to redress the balance, the numbers are relatively low.

#### ***The JSP AH Policy***

- 3.8 In formulating the JSP, the UAs have assessed a range of options to increase the supply of AH as summarised in Annex 3

3.9 The high level of need for Affordable Housing and the shortfall in both past and projected delivery, justifies the need to maximise delivery from all possible sources. Through this process the UAs have therefore formulated a policy framework which gives significant priority to the delivery of Affordable Housing, and this is set out primarily in JSP Policy 3. This entails;

- Making Affordable Housing delivery a priority in the Plan with a challenging requirement of 35% on all new sites;
- requiring policy compliance at nil public subsidy and where a proposal is demonstrably unviable, to provide that public subsidy or other forms of investment will be sought and secured to make up the shortfall;
- requiring small windfall sites to contribute to the supply. Affordable Housing will be required on all sites of 5 dwellings or more, or larger than 0.2 hectares (whichever is the lower);
- The demographics demonstrate an increasing need for suitable specialist housing for older people, including Affordable Housing. This is an added justification (on top of the imperative to increase delivery from all possible sources) for a requirement for all self-contained housing for older people to contribute towards meeting Affordable Housing need regardless of the level and type of care available, including proposals that come forward as Use Class C2;
- The same approach will be taken for student housing. In Bristol in 2016/17 there were 1994 completions of which 199 were Affordable Housing and 700 were student dwellings (providing 1237 bedspaces). In this context it is entirely justifiable that student housing should contribute towards delivering Affordable Housing;
- The full range of Affordable Housing tenure types and unit mixes to meet the needs evidenced by the SHMAs will be required;
- Affordable homes are to be provided on-site unless robustly justified in exceptional circumstances where an off-site provision or an equivalent financial contribution in lieu of on-site Affordable Housing may be acceptable, to be used for the provision of new Affordable Housing;
- requiring the Affordable Homes to remain at an affordable price in perpetuity or for the subsidy to be recycled for alternative Affordable provision, so that maximum value is generated and future eligible households can also benefit.

***Future Affordable Housing Supply***

3.10 The JSP spatial strategy (See Topic Paper 2) enables the generation of Affordable Housing as set out below;

- a) **Existing commitments** - for the period 2016-2036 61,500 total dwellings are projected to be delivered, of which 13,000 will be Affordable Housing.
- b) **Current forecasts for unidentified sites**

- c) **Small windfalls** – due to the high level of need for Affordable Housing and the shortfall in past delivery, there is a need to maximise delivery from all possible sources. The policy therefore requires Affordable Housing to be provided on all sites of 5 dwellings or more, or larger than 0.2 hectares (whichever is the lower). It has been assumed that 6,800 dwellings will be delivered from small windfalls of which 1,000 will be Affordable Housing.
- d) **Urban Living** – the forecast for delivery of Affordable Housing on unidentified brownfield sites has generally been based on historic outturn using a capacity based assessment rather than individually site based. Delivery at a rate lower than policy level has been assumed because of the likely nature of the sites involved. However delivery will be maximised by increasing densities in urban locations. Current projections assume that Urban Living sites will deliver a total of 16,200 dwellings of which 3,280 are expected to be Affordable Housing.
- e) **Non-strategic growth** – the forecast assumes a policy compliant position of 35% Affordable Housing, using developer subsidy where fully viable, and bringing in public subsidy to make up any shortfall where full delivery is unviable. Current projections are based on non-strategic growth sites delivering a total of 3,400 dwellings of which 1,190 will be Affordable Housing.
- f) **Strategic Development Locations** – the forecast assumes a policy compliant position of 35% Affordable Housing, using developer subsidy where fully viable, and bringing in public subsidy to make up any shortfall where full delivery is unviable. Current projections are based on the current 12 SDLs delivering a total of 17,600 dwellings of which around 6,000 will be Affordable Housing.

3.11 The table below shows the breakdown of expected Affordable Housing delivery between 2016 and 2036.

**Diagram 6: Projected Affordable Housing delivery to 2036**

<b>Supply Source</b>	<b>All Homes</b>	<b>Affordable Homes</b>
<i>Commitments in existing Plans</i>	<i>61,500</i>	<i>13,000</i>
<i>Contribution from Urban Living, non-strategic growth and SDLs</i>	<i>44,000</i>	<i>11,500</i>
<b>Total</b>	<b>105,500</b>	<b>24,500</b>

*NB Figures rounded up*

3.12 As a result the JSP is able to set an ambitious target of 24,500 net new Affordable Homes by 2036, which amounts to 76% of the total need. This is set out in JSP Policy 3.

There is a gap between the level of need and planned number of affordable homes that realistically can be delivered by the development industry based upon the current delivery model. It is clear that it is unrealistic to expect for the Plan alone to meet the full amount of affordable housing identified. Clearly the UAs will need to work with partners and use other mechanisms on top of the planning system to maximise the delivery of affordable homes. The four UAs have worked proactively together to identify additional funding opportunities and delivery mechanisms to boost projected delivery.

- 3.13 Other areas in the country have experienced the same issues and have therefore set out what can be achieved through their respective Spatial Strategies. For example, [The London Plan](#) (see 3.11 Affordable Housing Policy) includes a delivery target of 66% of the affordable housing need. The high level of need for Affordable Housing justifies a policy approach that maximises delivery from all possible sources. The four UAs have reviewed their approaches to ensure they have identified all options within their own control to maximise delivery.
- 3.14 A high level assessment of the capacity and appetite of Registered Providers to deliver Affordable Housing was carried out in May/June 2017. This demonstrates that there is the capacity locally to deliver the Affordable Housing target of 24,500 homes, and that additional capacity is available to go further towards meeting the total Affordable Housing need in the West of England, if the opportunities are available.

***Spatial disproportionality of need***

- 3.15 The Affordable Housing need across the WoE has to be addressed within the Plan. Each UA has had to consider how to meet its own Affordable Housing need but in addition how the overall WoE need can be met.
- 3.16 The majority of the Affordable Housing need is derived from Bristol, however current projections identify that this cannot be provided within Bristol because the scale of the need is too great, and the availability of suitable sites is limited. Many residential sites in Bristol have high redevelopment costs due to their brownfield status.
- 3.17 A balance needs achieving of meeting a UA's Affordable Housing need and contributing towards provision of Affordable Homes to also address Bristol's need, some of which will depend on location and spatial strategy.
- 3.18 In order to achieve this balance the four UAs have identified in the Plan that the Strategic Development Locations (SDLs) and other strategic locations within or well-related to the Bristol urban area must contribute to addressing the Affordable Housing need of Bristol as well as their own local need. The Affordable Housing contribution to assist meeting Bristol's need will be provided through on-site provision with the option of off-site contributions in locations less well-related to Bristol, to be spent on providing Affordable Housing.

**3.19 Delivery mechanisms will be determined through Supplementary Planning Document(s) and will include:**

- nomination rights in favour of Bristol or other appropriate arrangements for the allocation and sale of the Affordable Housing where Affordable Homes have been provided on a site within another UA area to meet Bristol need;
- details for where and when financial contributions are acceptable and the calculation of any financial contributions in lieu of on-site Affordable Housing;
- Where financial contributions are accepted to address Bristol's need, they should:
  - be held in a West of England Housing central pot
  - be retained for a maximum of ten years or to the end of the JSP period, whichever is the later, in order to maximise the opportunity to spend.

**3.20** In order to meet the need, Affordable Housing must be provided that meets the needs as evidenced by the SHMAs (or updated evidence) in the full range of Affordable Housing tenure types and unit mixes. This will be set out in detail in the SPD.

**4.0 MONITORING & REVIEW**

**4.1** The four UAs will continue to co-operate on monitoring arrangements and delivery of the spatial strategy and its Housing Requirement will be reported by the four UAs and through their Authority Monitoring Reports. The outputs will be taken into account in the preparation of the Mayoral Spatial Plan, taking account of the five yearly review proposals and the contingency set out in Policy 2 of the JSP. The Spatial Strategy Topic Paper sets out the approach to monitoring 5 year Housing Land Supply.

## Annex 1: Options to improve supply of affordable housing

The four UAs have reviewed their approach to identify any opportunities to boost the Affordable Housing trajectory since the Workshop on 1<sup>st</sup> December 2016.

Four categories have been explored in more detail:

Additional subsidy	The UAs have taken a robust approach to identify potential double-counting and have been cautious about assumptions of future public subsidy, as future programmes are unknown. It is reasonable to assume that some additional Affordable Housing may be funded under future Government supported programmes, but this has not been included in the target of 76%. Assumptions about new Government housing related infrastructure programmes (such as Housing Infrastructure Fund) have been excluded at this stage, due to potential overlap with the assumptions already made that subsidy will top-up any unviable Affordable Housing.
Taking control	All four UAs are actively considering ways to take better control of delivery including setting up of Housing Companies. The Affordable Housing target takes account of the current Bristol Housing Company programme.
Increased requirement	Increasing the overall housing requirement by applying an additional uplift above that already included in the assessment was considered in the 2016 consultation. While there may be some effect on increasing affordable housing, this is not in itself the solution. A more radical change was needed than a simple additional uplift. It was agreed through more recent consultation processes that a suite of options will be needed as a pragmatic response to boost the supply of affordable housing alongside the prioritisation of affordable housing provision through the JSP, which involves changes to current policies to maximise supply, as well as the additional flexibility and contingency approach taken on setting the WoE Housing Requirement.
Building partnerships	A Statement of Commitment is being progressed which will set out RPs' commitment to invest in new Affordable Homes in the West of England.

The diagram below identifies the current sources of potential additionality to AH supply that may come forward within the lifetime of the Plan. An additional 1500 Affordable Homes from these sources would boost delivery to at least 80%:

	<b>potential additional AH that has not been included in any previous calculation</b>
<b>1</b>	additional units from LA capital funding programmes
<b>2</b>	potential LA and other publically owned sites not already accounted for (at policy compliant level and potential for developing at higher than 35%AH)

## Appendix F

West of England Joint Spatial Plan Topic Paper 1 version 1 October 2017

---

<b>3</b>	potential additional funding from HCA not already included
<b>4</b>	potential for additional units arising from institutional investment
<b>5</b>	additional funding via potential WECA Enabling Fund i.e. infrastructure funding, additionality
<b>7</b>	additional AH that could be delivered by Housing Companies
<b>8</b>	additionality via estate regeneration, in addition to Urban Living



**Background Papers**

1. National Planning Policy Framework 2012
2. National Planning Practice Guidance
3. Wider Bristol Area SHMA Vol 1
4. Wider Bristol Area SHMA Vol 2
5. Bath & North East Somerset Council SHMA Update
6. Housing White Paper – Fixing our Broken Housing Market 2017
7. Government consultation paper 2017: Planning for the right homes in the right places: consultation proposals

The West of England Joint Spatial Plan: Publication Draft

Equality Impact Assessment

October 2017



## Equality Impact Assessment: Summary Statement

### Name of the plan being assessed:

West of England Joint Spatial Plan: Publication version (November 2017)

### Date of assessment

October 2017

### Lead contact details

Laura Ambler, Head of Housing and Planning, West of England Combined Authority and Local Enterprise Partnership

### Others involved in the assessment, including members of staff, the community, stakeholders or elected members

Michael Reep, Planning Policy Manager, North Somerset  
Simon de Beer, Bath and North East Somerset  
Sarah O'Driscoll, Strategic City Planning Manager, Bristol City Council  
Patrick Conroy, Strategic Planning Policy and Specialist Advice Manager, South Gloucestershire Council

### What are the intended aims of the Plan?

The local authorities of Bath and North East Somerset Council, Bristol City Council, North Somerset Council and South Gloucestershire Council are jointly preparing the Joint Spatial Plan (JSP). The JSP is a statutory Development Plan Document that will provide the strategic overarching development framework for the West of England to 2036.

### Who is intended to benefit from the Plan?

The communities living and working in and visiting the West of England

### Service head sign off

**Name:** Louise Fradd

**Date:** October 2017

## 1. Assessing relevance

Please assess the relevance of your plan on the following areas of equality. You should consider:

- Both positive and negative impacts
- Any barriers people may experience in accessing services
- How the plan is likely to affect the promotion of equality
- Knowledge of customer experiences to date
- It is not enough to state 'N/A' in this section, a more in-depth explanation is required to demonstrate if/how each area is relevant.

Equality area	Relevant? Yes/No	Reason
Race - Including Gypsies and Travellers	No	No. Policies relating to Gypsies and Travellers will be addressed in more detailed local plans.
Disability	Yes	Access to housing, jobs, infrastructure, services and facilities.
Sex	No	The JSP is a strategic land use plan and there is no relevance to this group.
Age - Old and young	Yes	Access to housing, jobs, infrastructure, services and facilities.
Religion and Belief	Yes	Access to services and facilities.
Sexual Orientation	No	The JSP is a strategic land use plan and there is no relevance to this group.
Gender Reassignment	No	The JSP is a strategic land use plan and there is no relevance to this group.
Marriage or Civil Partnership	No	The JSP is a strategic land use plan and there is no relevance to this group.
Pregnancy or women on Maternity Leave	Yes	Access to infrastructure, services and facilities.
Income and deprivation	Yes	Access to housing, jobs, infrastructure, services and facilities.
<b>Other areas, if relevant consider:</b> - Carers - Socio-economic disadvantage - Parents - Location - People living in rural areas - Ex-offenders - Service or Ex-service personnel and their	Yes	The plan seeks to address factors affecting socio-economic disadvantage. The plan identifies housing needs and sets the context for the delivery of affordable housing and the creation of a mix of housing types and tenures to be implemented through more detailed local plans. This will include meeting the needs of different groups such as the elderly or vulnerable, and needs in different parts of the plan area.

families		
----------	--	--

The remainder of your assessment should focus only on the areas that you have answered 'yes' to in the table above.

## 2. Information and Evidence

Under the Equality Act 2010 we are required to carry out an 'analysis of the effects on equality' of all of our policies. To enable this analysis it is important that each area has relevant equality information. This can be national, local or service specific information.

### a. Which equality areas do you routinely monitor?

The collection of equality information across our services is essential to enable us to understand the effect of our policies on equality groups. Please indicate the information collected in this policy area:

Age	Yes	Carers	Yes	Disability	Yes
Location	Yes	Marriage or Civil Partnership	Yes	Parents	Yes
Pregnancy/Maternity Leave	No	Race	Yes	Religion or belief	Yes
Sex	Yes	Sexual Orientation	No	Socio Economic	Yes
Gender reassignment	No	Other area, please specify:			

Page 414

### b. What data, research and other evidence or information is available which is relevant to this EqIA?

If relevant you can include: quantitative/qualitative research, national reports, results from recent consultations, information from stakeholders, findings of recent inspections etc.

The main data source used is the 2011 Census.
---

### c. What further data or information do you need to gather during the course of the policy development?

None in respect of the Joint Spatial Plan. Further information will be gathered as more detailed policies and proposals are developed through local plans and other more detailed policy documents.
---

### 3. Engagement

When completing an EqlA you should be mindful of the obligation to publish the results of its engagement activity. It is a statutory requirement and therefore a core element of the EqlA. Engagement may be one-off or repeated over a longer period of time. It may be formal or informal. It may be focused on a specific issue or on service delivery or workforce issues. This section can reference previous engagement activity or any work done specifically during the policy development.

#### a. Have those affected by this policy been consulted?

Briefly describe what you did, with whom, when and where. You should list the methods of consultation used. Please outline a brief summary of the responses gained and links to relevant documents, as well as any actions.

The Joint Spatial Plan Issues and Options was consulted upon between 9<sup>th</sup> November 2015 and 29<sup>th</sup> January 2016. A consultation draft of the Joint Spatial Plan Towards the Emerging Spatial Strategy was consulted on between 7 November and 19 December 2016. The responses to this consultation can be view at: [www.jointplanningwofe.org.uk](http://www.jointplanningwofe.org.uk)

Page 415

### 4. Conclusions and mitigating action

Please review the information you have identified or collected through this assessment and indicate if any differential impacts exist. Importantly you should also consider what changes or actions you need to take to mitigate any negative impacts that have been identified.

#### a. What does the information you have gathered through monitoring and engagement tell you?

The Joint Spatial Plan will have an overall positive impact on the groups considered through the identification of overall housing needs, including affordable housing, the identification of employment opportunities and strategic infrastructure including transport.

#### b. What course of action will you take as a result of this EqlA?

When considering your actions please be mindful of the council's general duties under the Equality Act 2010.

- To eliminate unlawful discrimination, harassment, victimisation
- Advance equality of opportunity between persons who share a protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and persons who do not

The information in this section should focus on practical actions that can be taken to improve the outcomes for equality groups.

The Joint Spatial Plan is considered to have an overall positive impact on the groups considered. It will set the overall strategic framework for the delivery of more specific actions that can be taken to improve the outcomes for equality groups.

**c. Final assessment of impact**

Following this assessment please assess the likely level of impact of the policy/or proposals in the Plan on the equality groups included within this assessment.

High		Medium		Low	X
------	--	--------	--	-----	---

**5. Monitoring**

To demonstrate achievements and to avoid challenge you need to identify what mechanisms are in place to review actual impacts or to monitor progress against the actions set within this assessment. Please indicate how you will monitor the results of this assessment.

Please tick as appropriate

Page 416

Action	Yes/No	If yes, date:
Review of this EqIA	Yes	Five year review of the JSP in 2023.
Incorporated into project reviews/reports	Yes	Production of individual UA local plans from 2017/2018 onwards.
Service/Team plan reviews	No	
Analysis of customer feedback	No	
Citizens Panel	No	
Staff survey	No	
Inspection reports	No	
Regular reports to Corporate Management Team	No	
Regular reports to elected members	No	
Other, please specify:		

**6. Publishing this assessment**

In order to demonstrate transparency in our policy development this assessment should be made available to the public and stakeholders through the most appropriate means. For example through the website, a section within the policy document, and through committee reports.





## Procurement and partnerships

### Consideration of external contractor obligations and partnership working

Is the work associated with this policy due to be carried out wholly or partly by contractors? If yes, you need to include equality considerations into the contract.

Specifically you should set out how you will make sure that any partner you work with complies with the Equality Act 2010, the integral public sector duties and how you will monitor this. A reminder of the public sector duties:

- To eliminate unlawful discrimination, harassment, victimisation
- Advance equality of opportunity between persons who share a protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and persons who do not

The Equality Act 2010 also states:

*A person who is not a public authority but who exercises public functions must, in the exercise of those functions have due regard to the public sector duties'.*

You will need to think about:

- pre-qualification and approval of preferred suppliers
- tendering and specifications
- awards process
- contract clauses
- monitoring and performance measures

Please set out what steps you will take to build into all stages of the procurement process the requirement to consider equality.

N/A

## **CHAPTER 1: Introduction**

### **Background to the Equality Impact Assessment**

This report sets out the results of the Equality Impact Assessment (EqIA) of the West of England Joint Spatial Plan (JSP) Publication version November 2017.

The key challenges facing the West of England (WoE) are how to accommodate and deliver much needed new homes, jobs and infrastructure whilst protecting and enhancing its unique and high quality built and natural environment. It is this combination that will create viable, healthy and attractive places. This is key to the ongoing success of the West of England and which contributes to its appeal and its high quality of life.

The local authorities of Bath and North East Somerset Council, Bristol City Council, North Somerset Council and South Gloucestershire Council have joined forces to prepare the Joint Spatial Plan (JSP). The JSP is a strategic Development Plan Document that will provide the overarching development framework for to guide housing, employment and infrastructure requirements to 2036.

The purpose of the EqIA is to highlight the likely impact of the policies and proposals in the JSP on different community groups, and how the needs of such groups have been taken into account in relation to the development of the policies.

EqIAs are carried out as part of councils' Public Sector Equality Duty under the Equality Act 2010. The Act has harmonised and replaced previous anti-discrimination legislation and includes the introduction of 'protected characteristics' and new forms of discrimination. The process of undertaking an EqIA provides the evidence that councils have complied with the Public Sector Equality Duty under the Equality Act.

The Public Sector Equality Duty requires Councils to have due regard to the need to:

- eliminate discrimination;
- advance equality of opportunity;
- foster good relations between different people when carrying out their activities.

The Public Sector Equality Duty also requires Councils to consider the effect or impact of their policies and practices on people who share the following 'protected characteristics', also known as equalities communities:

- Age;
- Disability;
- Gender reassignment;
- Marriage and Civil Partnership;
- Pregnancy and maternity;
- Race;
- Religion and belief;
- Sex;
- Sexual Orientation.

### **West of England Joint Spatial Plan**

The JSP is a strategic planning document being prepared jointly by the four authorities in the West of England. It will identify the overall housing needs for the plan area, including affordable housing, the employment requirements and strategic infrastructure required 2016-2036. It will set out the spatial strategy and identify strategic development locations.

## The structure of this report

Following this Introduction, Chapter 2 sets out the approach that has been taken in preparing this report. This chapter outlines which key equality groups have been focused upon when considering the impacts that the objectives and policies within the Joint Spatial Plan may have.

Chapter 3 sets out the screening matrix of the objectives and policies within the Joint Spatial Plan to ascertain whether they are likely to have an adverse impact on any of the equality groups which are being considered.

Chapter 4 analyses the outcomes of the screening matrix and whether any of the policies need to be assessed further.

Chapter 5 sets out the consultation process involved in preparing the Joint Spatial Plan.

Within the final chapter (Chapter 6), recommendations have been made for monitoring the impacts of the JSP policies on different equality groups. This chapter also identifies lessons learnt from developing the JSP which should be carried forward when preparing other Development Plan Documents to ensure that unlawful discrimination is eliminated and equality is promoted.

## **CHAPTER 2: The Approach to the Equality Impact Assessment**

This EqIA follows guidance from the Improvement and Development Agency for Local Government (IDeA).

Consideration has also been given to guidance from the Planning Advisory Service (PAS), *Equality and Diversity: Improving planning outcomes for the whole of the community* (September 2008).

### **Initial Screening**

IDeA recommends that initial screening needs to take place for all policies, strategies, procedures and functions. This will determine whether or not it is necessary to carry out a full Equality Impact Assessment for this area of work with the key question being '*does the West of England Plan have the potential to cause adverse impact or discriminate against different groups in the community?*'

Due to the broad scope of the Joint Spatial Plan, there may be potential for it to cause adverse impact or discriminate against different groups in the community. It is therefore considered appropriate for an EqIA of the policies in the plan to be carried out.

### **Scoping and Defining**

IDeA recommend that different perspectives and experiences are used in undertaking the EqIA. The ideal is that those responsible for delivering the strategy are involved and others with technical expertise or with specialist knowledge are involved where appropriate.

This EqIA and report has therefore been led by officers from the planning policy teams who are responsible for preparing the JSP. The specialist knowledge of the Equality and Diversity Teams has also been utilised where appropriate.

### **Information Gathering**

#### **What information do you have that demonstrates this impact?**

It is necessary to identify sources of information which will be used to assist in the determination of whether the Joint Spatial Plan is likely to have an adverse impact or discriminate against different groups in the community. IDeA identifies that sources of information could include Census data and national and local statistics. Guidance from the PAS however, recognises that local authorities need to go beyond Census data as it does not capture recent demographic changes and sheds little light on the needs, experiences and aspirations of local groups in relation to the built environment.

In aiding the development of this report and undertaking of the assessment the following sources of information have therefore been used and are referred to where appropriate (see Appendix B for links to these sources of information):

- Census data (2011)
- National and Local Statistics
- Mosaic data
- West of England Strategic Green Infrastructure (GI) Framework
- Customer Insight: A portrait of diversity in North Somerset 2010
- Indices of Multiple Deprivation 2010
- West of England Gypsy and Traveller Accommodation assessment (2007)
- South Gloucestershire and city of Bristol Gypsy and Traveller Accommodation Assessment (2013)
- North Somerset Gypsy and Traveller Accommodation Consultation 2011

- North Somerset Sustainable Community Strategy 2008 – 2026
- South Gloucestershire Sustainable community Strategy (2016)
- South Gloucestershire Community Profiles
- Strategic Housing Market Assessments
- UA Strategic Flood Risk Assessments
- UA Annual Monitoring Reports including Employment Land Review/Survey, Housing and Retail.
- South Gloucestershire economic viability assessment affordable housing policy study (2013)
- Bristol City Council Ward Profiles 2017
- The Population of Bristol 2017
- Bristol's Quality of Life Survey 2016

Using the information gathered from the sources listed above, Table 1 provides some base-line information on the different groups focused upon in this assessment. These groups are identified in the Equality Act 2010. The groups and target areas include:

- Race
- Disability
- Sex
- Age
- Religion and belief
- Sexual orientation
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity

The following section of this report (Chapter 3) screens each of the Joint Spatial Plan policies against the groups identified in Table 1. If it is identified through the screening exercise that a policy may adversely impact upon a particular equality group a full assessment would be required. This has been considered in Chapter 4 of this report.

**Table 1: Baseline data for each equality group**

<b>Equality Group</b>	<b>West of England Summary</b>
<b>Race</b>	The proportion of people from black and other minority ethnic groups in the West of England at the 2011 Census was 9.1% which is below the England and Wales figures of 14%. The proportion within the four districts varies significantly from Bristol 16.0%, B&NES 5.4%, South Gloucestershire 5.0% and North Somerset 2.7%. The proportion of Gypsy or Irish Travellers was 0.1%, the same as for England and Wales.
<b>Disability</b>	The 2011 Census identified 16.8% of people in the West of England whose day-to-day activities are limited, lower than the England and Wales average of 17.9%. In North Somerset, 19.1% of its population has day-to-day activities which are limited, reflecting the older age profile of the population.
<b>Sex</b>	ONS Mid-2016 Population Estimates show that within the West of England there were slightly more females (50.4%) than males (49.6%). This reflects the figures for England and Wales of 50.6% females and 49.4% males.
<b>Age</b>	The population of the West of England mid-2016 was 1,131,300 comprised of Bristol 454,200, B&NES 187,800, South Gloucestershire 277,600 and North Somerset 211,700. 18% of the population are children (aged 0-15), 64% of working age (aged 16-64) and 17% older people (aged 65 and over), these proportions are very similar to the England and Wales averages. The four local authorities have similar proportions of children. Bristol has the highest proportion of working age population at 68% and North Somerset the lowest at 58%. Bristol has the lowest proportion of older people at 13% and North Somerset the highest at 23%.
<b>Religion and Belief</b>	The 2011 Census identified that in the West of England 54.2% of people identified as Christian (59.3% in England and Wales). The second largest religion was Muslim at 2.5% - this is lower than the England and Wales average of 4.8%, although in Bristol 5.1% of people identified as Muslim and so higher than the national average. 41.5% of people had no religion/religion not stated, a much higher proportion than the England and Wales average 32.3%.
<b>Sexual Orientation</b>	There are no local estimates of the proportion of the population by sexual orientation.
<b>Gender reassignment</b>	There are no local estimates relating to gender reassignment.
<b>Marriage and civil partnership</b>	The 2011 Census showed that 44.7% of people were married (46.6% in England and Wales) and 0.2% in a registered same-sex civil partnership (0.2% in England and Wales). The proportion of people either married or in a registered same-sex civil partnership varies between the four districts - Bristol 36.6%, B&NES 45.9%, South Gloucestershire 52.0% and North Somerset 52.5%.
<b>Pregnancy and maternity</b>	ONS data for 2016 recorded 1,799 live births in B&NES, 6,400 in Bristol, 2188 in North Somerset and 3,090 in South Gloucestershire.
<b>Income and deprivation</b>	The 2015 English Indices of Deprivation shows that there were a total of 97 Lower Layer Super Output Areas (LSOA11s) in the West of England area falling within the most deprived 20% of areas in England – 77 areas in Bristol, 14 areas in North Somerset, 5 areas in B&NES and one area in South Gloucestershire. In the West of England 13% of the population are income deprived – ranging from 17% in Bristol, 12% in North Somerset and 9% in both B&NES and South Gloucestershire.

### **CHAPTER 3: Screening the Joint Spatial Plan**

#### **What is the potential impact on diverse groups?**

The Joint Spatial Plan contains, 7 policies including 12 specific sub policies for the Strategic Development Locations across the region. To understand the specific impact of the Joint Spatial Plan it is necessary to examine the individual policies.

Table 2 outlines the key characteristics of each priority and policy within the Joint Spatial Plan and considers whether there is the potential for the policy to have an impact on each of the groups identified in Chapter 2.

The key below identifies the symbols used to summarise the impact on a group it is considered each policy will have.

<b>Symbol</b>	<b>Likely Impact</b>
+	Positive
0	Neutral
-	Negative
N/I	Not Identifiable



**Table 2: Initial Screening Matrix**

Plan Priorities and Policies	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
<b>Policy 1: The Housing Requirement</b> Provision will be made for the delivery of a minimum of 105,500 additional dwellings across the West of England 2016-2036.	N/I	+	N/I	+	N/I	N/I	N/I	N/I	N/I	+	High level housing requirement will have a positive impact in terms of additional provision over the plan period.
<b>Policy 2: The Affordable Housing Target</b> The Affordable Housing Target for the West of England for 2016-2036 is 24,500 net new affordable dwellings. Delivery of affordable housing, in a range of tenure and unit types, is a significant priority in all residential development.	N/I	+	N/I	+	N/I	N/I	N/I	N/I	N/I	+	Affordable housing target will have a positive impact on future delivery.
<b>Policy 3: The Employment Land Requirement</b>	N/I	+	N/I	N/I	N/I	N/I	N/I	N/I	N/I	+	Overall strategic employment requirement will support job creation and have a positive impact.

Page 425

Plan Priorities and Policies	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
The Joint Spatial Plan (JSP) supports the delivery of 82,500 additional jobs in the West of England between 2016 and 2036. The Plan seeks to enable access to employment opportunities for all through the spatial distribution of development.											
<b>Policy 4: Place shaping Principles</b> All new development must contribute towards the delivery of high quality and sustainable places. Key principles should be used to inform the development and delivery of high quality and sustainable places	N/I	+	N/I	+	+	N/I	N/I	N/I	N/I	+	By creating more attractive, sustainable places, the place shaping principles will have a positive impact.
<b>Policy 5: The Spatial Strategy</b>	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	+	The spatial strategy enables the creation of more sustainable and accessible places which will have a positive impact.
<b>Policy 6: Strategic</b>	N/I	+	N/I	+	N/I	N/I	N/I	N/I	N/I	+	The delivery of key strategic infrastructure in step with

Plan Priorities and Policies	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
<b>Infrastructure Requirements.</b> Strategic infrastructure will be required to support the effective implementation of the Joint Spatial Plan Spatial Strategy.											new development will have a positive impact.
<b>Policy 7: Strategic Development Locations Site Requirements</b>	N/I	+	N/I	+	N/I	N/I	N/I	N/I	N/I	+	The new strategic development locations will have a positive impact through the creation of sustainable communities.
<b>Policy 7.1: North Keynsham</b>	N/I	+	N/I	+	+	N/I	N/I	N/I	+	+	Improved public transport options such as metrobus and rail improvements will benefit disabled people, people without access to a car, older and younger people and parents, and people on low incomes. When developments take place with public transport it is important to ensure that sensory loss issues are considered as well as physical disabilities. Access to information such as large print/audio timetables is also important.  The requirement for affordable housing will benefit lower income groups including young people who are currently priced out of the housing market.  Zero carbon and energy positive solutions for the

Plan Priorities and Policies	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
											<p>development will benefit all groups, but in particular those on a low income.</p> <p>The provision of a network of green infrastructure which will provide flood risk management, wildlife, landscape and heritage enhancement and protection, which will have overall health benefits for all groups.</p>
<b>Policy 7.2: Whitchurch</b>	N/I	+	N/I	+	+	N/I	N/I	N/I	+	+	<p>Improved public transport options such as metrobus will benefit disabled people, people without access to a car, older and younger people and parents, and people on low incomes. When developments take place with public transport it is important to ensure that sensory loss issues are considered as well as physical disabilities. Access to information such as large print/audio timetables is also important.</p> <p>The requirement for affordable housing will benefit lower income groups including young people who are currently priced out of the housing market.</p> <p>Zero carbon and energy positive solutions for the development will benefit all groups, but in particular those on a low income.</p>

Plan Priorities and Policies	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
											The provision of a network of green infrastructure which will provide flood risk management, wildlife, landscape and heritage enhancement and protection, which will have overall health benefits for all groups.
Policy 7.3: Land at Bath Road, Brislington	N/I	+	N/I	+	+	N/I	N/I	N/I	+	+	<p>Improved public transport options such as metrobus and rail improvements will benefit disabled people, people without access to a car, older and younger people and parents, and people on low incomes. When developments take place with public transport it is important to ensure that sensory loss issues are considered as well as physical disabilities. Access to information such as large print/audio timetables is also important.</p> <p>The requirement for affordable housing will benefit lower income groups including young people who are currently priced out of the housing market.</p> <p>Zero carbon and energy positive solutions for the development will benefit all groups, but in particular those on a low income.</p>

Plan Priorities and Policies	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
											The provision of a network of green infrastructure which will provide flood risk management, wildlife, landscape and heritage enhancement and protection, which will have overall health benefits for all groups.
<b>Policy 7.4: Backwell</b>	N/I	+	N/I	+	+	N/I	N/I	N/I	+	+	<p>Improved public transport options such as metrobus and rail improvements will benefit disabled people, people without access to a car, older and younger people and parents, and people on low incomes. When developments take place with public transport it is important to ensure that sensory loss issues are considered as well as physical disabilities. Access to information such as large print/audio timetables is also important.</p> <p>The requirement for affordable housing will benefit lower income groups including young people who are currently priced out of the housing market.</p>
<b>Policy 7.5: Banwell Garden Village</b>	N/I	+	N/I	+	+	N/I	N/I	N/I	+	+	<p>Improved public transport options will benefit disabled people, people without access to a car, older and younger people and parents, and people on low incomes. When developments take place with public transport it is important to ensure that sensory loss issues are considered as well as physical disabilities. Access to information such as large print timetables is also</p>

Plan Priorities and Policies	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
											<p>important.</p> <p>The requirement for affordable housing will benefit lower income groups including young people who are currently priced out of the housing market.</p> <p>The new garden village will have a network of green infrastructure which will provide access to open space through the provision of footpaths and cycle routes which will have overall health benefits for all groups.</p> <p>Provision of employment land will increase access to the job market benefiting low income groups.</p> <p>Creation of a new local centre with a range of retail, job opportunities, services and facilities will increase the ability of certain groups to access services and facilities.</p>
<b>Policy 7.6: Churchill Garden Village</b>	N/I	+	N/I	+	+	N/I	N/I	N/I	+	+	<p>The provision of increased transport options will benefit disabled people, people without access to a car, older and younger people and parents, and people on low incomes. When developments take place with public transport it is important to ensure that sensory loss issues are considered as well as physical disabilities. Access to information such as large print/audio timetables is also important.</p>

Plan Priorities and Policies	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
											<p>The requirement for affordable housing will benefit lower income groups including young people who are currently priced out of the housing market.</p> <p>The new garden village will have a network of green infrastructure which will provide access to open space through the provision of footpaths and cycle routes which will have overall health benefits for all groups.</p> <p>Provision of employment land will increase access to the job market benefiting low income groups.</p> <p>Creation of a new local centre with a range of retail, job opportunities, services and facilities will increase the ability of certain groups to access services and facilities.</p>
<b>Policy 7.7: Nailsea</b>	N/I	+	N/I	+	+	N/I	N/I	N/i	+	+	<p>Improved public transport options such as metrobus and rail improvements will benefit disabled people, people without access to a car, older and younger people and parents, and people on low incomes. When developments take place with public transport it is important to ensure that sensory loss issues are considered as well as physical disabilities. Access to information such as large print/audio timetables is also important.</p> <p>The requirement for affordable housing will benefit lower income groups including young people who are currently</p>



Plan Priorities and Policies	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
											<p>priced out of the housing market.</p> <p>Provision of employment land will increase access to the job market benefiting low income groups.</p> <p>Creation of a new local centre with a range of retail, job opportunities, services and facilities will increase the ability of certain groups to access services and facilities.</p>
<b>Policy 7.8: Buckover Garden Village</b>	N/I	+	N/I	+	+	N/I	N/I	N/I	+	+	<p>The provision of a range of homes and requirement for affordable housing will benefit lower income groups including young people who are currently priced out of the housing market.</p> <p>The new garden village will have a network of green infrastructure which will provide access to open space, including for food production and to protect heritage and ecology, which will have overall health benefits for all groups.</p> <p>Creation of a new local centre with a range of retail, job opportunities, services and facilities, including schools and cultural facilities, will increase the ability of certain groups to access services and facilities.</p> <p>Provision of employment land will increase access to the job market benefiting low income groups.</p>

Plan Priorities and Policies	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
											<p>Zero carbon and energy positive solutions for the development will benefit all groups, but in particular those on a low income.</p> <p>Improved public transport options such as metrobus and rail improvements will benefit disabled people, people without access to a car, older and younger people and parents, and people on low incomes. The provision of footpaths and cycle routes will also have overall health benefits for all groups. When developments take place with public transport it is important to ensure that sensory loss issues are considered as well as physical disabilities. Access to information such as large print / audio timetables is also important.</p>
<b>Policy 7.9: Charfield</b>	N/I	+	N/I	+	+	N/I	N/I	N/I	+	+	<p>The provision of a range of homes and requirement for affordable housing will benefit lower income groups including young people who are currently priced out of the housing market.</p> <p>Provision of new and improved infrastructure e.g. sewerage network, retail and community facilities, including education establishments will increase the ability of certain groups to access services and facilities.</p> <p>Improved road network, public transport options and rail improvements will benefit disabled people, people</p>

Plan Priorities and Policies	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
											<p>without access to a car, older and younger people and parents, and people on low incomes. The provision of footpaths and cycle routes will also have overall health benefits for all groups. When developments take place with public transport it is important to ensure that sensory loss issues are considered as well as physical disabilities. Access to information such as large print / audio timetables is also important.</p> <p>The provision of a network of green infrastructure which will provide flood risk management, wildlife, landscape and heritage enhancement and protection, which will have overall health benefits for all groups.</p>
<b>Policy 7.10: Coalpit Heath</b>	N/I	+	N/I	+	+	N/I	N/I	N/I	N/I	+	<p>The proposed new neighbourhood will provide homes, including affordable housing and will benefit lower income groups including young people who are currently priced out of the housing market.</p> <p>Provision of employment land will increase access to the job market benefiting low income groups.</p> <p>Improved public transport options such as metrobus, rail and road improvements, including park and ride facilities, will benefit disabled people, people without access to a car, older and younger people and parents, and people on low incomes. The provision of cycle routes will also have overall health benefits for all groups. When</p>

Plan Priorities and Policies	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
											<p>developments take place with public transport it is important to ensure that sensory loss issues are considered as well as physical disabilities. Access to information such as large print / audio timetables is also important.</p> <p>The provision of a network of green infrastructure will reinforce the green belt boundary, improve aesthetics and access to the countryside and protect the setting of heritage assets, which will have overall health benefits for all groups.</p>
<b>Policy 7.11: Thornbury</b>	N/I	+	N/I	+	+	N/I	N/I	N/I	N/I	+	<p>The proposed new homes, including affordable housing, will benefit lower income groups including young people who are currently priced out of the housing market. Provision of employment land will increase access to the job market benefiting low income groups.</p> <p>Provision of new retail and community facilities, including open space will increase the ability of certain groups to access services and facilities and improve health for all groups.</p> <p>The provision of a network of green infrastructure will protect the setting of local assets and rural character, assist in flood management and access to the countryside, which will have overall health benefits for all groups.</p>

Plan Priorities and Policies	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
											Improved public transport options such as metrobus and rail and road improvements, including park and ride facilities, improvements will benefit disabled people, people without access to a car, older and younger people and parents, and people on low incomes. The provision of footpaths and cycle routes will also have overall health benefits for all groups. When developments take place with public transport it is important to ensure that sensory loss issues are considered as well as physical disabilities. Access to information such as large print / audio timetables is also important.
<b>Policy 7.12: Yate</b>	N/I	+	N/I	+	+	N/I	N/I	N/I	N/I	+	<p>The proposed new neighbourhood will provide a range of new homes, including affordable housing and will benefit lower income groups including young people who are currently priced out of the housing market.</p> <p>Provision of a significant amount of employment land will increase access to the job market benefiting low income groups.</p> <p>Improved public transport options such as metrobus and rail and road improvements, including park and ride facilities, improvements will benefit disabled people, people without access to a car, older and younger people and parents, and people on low incomes. The provision</p>

Plan Priorities and Policies	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
											<p>of footpaths and cycle routes will also have overall health benefits for all groups. When developments take place with public transport it is important to ensure that sensory loss issues are considered as well as physical disabilities. Access to information such as large print / audio timetables is also important.</p> <p>The provision of a network of green infrastructure and protection through new designations will reinforce the green belt boundary, protect landscape quality and improve aesthetics and access to the countryside, which will have overall health benefits for all groups.</p>

## **CHAPTER 4: An Assessment of the Joint Spatial Plan Policies**

The screening of the Joint Spatial Plan policies in Chapter 3 has identified that the majority of the policies within the Plan are likely to have a positive impact on the defined equality groups, however, most of the impacts are not identifiable as they are strategic policies focused on the built environment and land use planning. The groups that benefit most from the policies are the disabled, younger and older people, low income groups and families, while those with a religion or belief or pregnancy/maternity may also benefit. The policies tend to favour these groups due to the demographic make-up of the region (as set out in Table 1) and the evidence base which supports the need to address the requirements of these groups. The main impacts for these groups are summarised as follows:

### **Race:**

- No significant negative or positive benefits.

### **Disability:**

#### **Positive impacts**

- Locating the majority of development towards areas where there are already a range of services and facilities or potential to establish will assist those with poor transport accessibility.
- Supporting development designed to adapt to the changing needs of its occupants.
- Ensuring the effects on health are considered in new developments and that sites are made available for new or improved health care provision.

### **Sex:**

- No significant negative or positive benefits.

### **Age:**

#### **Positive impacts**

- Locating the majority of development towards areas where there are already a range of services and facilities or potential to establish new will assist those with poor transport accessibility.
- Providing a mix of housing types and tenures including affordable housing will benefit a range of groups, particularly younger people who are currently priced out of the housing market and those who wish to downsize.
- Ensuring the effects on health are considered in new developments and that sites are made available for new or improved health care provision.

### **Religion and Belief:**

- No significant negative or positive benefits. The new development areas may have an impact where they incorporate places of worship or other facilities.

### **Sexual Orientation:**

- No significant negative or positive benefits.

### **Gender Reassignment:**

- No significant negative or positive benefits.

### **Marriage and Civil Partnership:**

- No significant negative or positive benefits.

### **Pregnancy and Maternity:**

- No significant negative or positive benefits. Transport policies may have a marginal effect in increasing travel options for women without a car. Access to new or improved health care provision may benefit this group.

**Low income and deprivation:**

Positive impacts

- Locating the majority of development towards areas where there are already a range of services and facilities or potential to establish new will assist those with poor transport accessibility.
- Providing more sites for employment development creating more jobs within the region.
- Providing more affordable housing which will benefit those on low incomes.
- Ensuring that affordable and market housing are better integrated in order to prevent actual or perceived segregation.

All groups will benefit from the Joint Spatial Plan policies through the provision of a broader mix of housing, more jobs, access to green infrastructure, including open space, walking and cycling routes and improved access to services and facilities. No negative impacts have been identified and no further assessment is considered necessary at this stage.



## **CHAPTER 5: Consultation**

### **Have those affected by the Joint Spatial Plan been consulted?**

The Joint Spatial Plan was consulted upon between 9<sup>th</sup> November 2015 and 29<sup>th</sup> January 2016. A consultation draft of the Joint Spatial Plan was consulted on between 7 November and 19 December 2016. The responses to these consultations can be view at: [www.jointplanningwofe.org.uk](http://www.jointplanningwofe.org.uk). The Publication version will be subject to consultation between 22 November 2017 and 10 January 2018.

### **Drawing on Plans, Strategies and Other Background Evidence**

The Joint Spatial Plan draws on information contained within policies and strategies across the four authorities and is informed by a range of evidence sources proportionate to its role as a strategic planning document. Equality Impact Assessments will be undertaken by the authorities as the strategic requirements and principles are translated into more detailed policies and proposals through local plans.

## **CHAPTER 6: Summary**

### **What are the key messages that you need to communicate about the impact of the Joint Spatial Plan policies?**

This EqIA has examined whether the Joint Spatial Plan policies will or are likely to cause adverse impact or discriminated against different groups in the community. The assessment has revealed that the policies in the plan are likely to have a beneficial impact on the equality groups within the region. There are other policies which may appear to favour and target certain groups however, justification for this emanates from the West of England's evidence base, the consultation undertaken and the framework provided by Government guidance. As identified as part of this EqIA process, these policies aim to take positive action in targeting and meeting local needs and creating a 'level playing field' in the access to services. Indeed, the overall Plan will contribute directly and indirectly to the delivery and accessibility of new homes, schools, employment opportunities and infrastructure facilities. All groups will benefit through the provision of more housing, more jobs and improved access to services and facilities.

### **What course of action could we take to mitigate the impact identified? Is the course of action justifiable?**

Based on the judgements made it is not considered that any measures are required to mitigate against any impact a policy may have. No negative impacts have been identified and no further assessment is considered necessary at this stage.

Further EqIAs may be required where this assessment has not been able, at this stage, to identify impacts because the proposals are at a relatively high level. This is the case with many of the Strategic Development Locations, where design issues and the precise distribution of uses remain to be resolved. These assessments are likely to be carried out through Local Plans.

### **Are there plans to monitor the impact of the Joint Spatial Plan policies?**

Information on monitoring of the JSP is expected to be reported through joint or individual UA Annual Monitoring Reports. Each authority will:

- undertake a consistent and jointly agreed process of monitoring which will identify changes in stock, the contributions of different sources of supply, changes in housing requirements, and the provision of necessary infrastructure and services; and
- in considering the release of sites for housing through local plans, take account of progress in implementing the JSP proposals across the plan area as a whole, including its neighbouring authorities.

## **APPENDIX A: Consultation Response**

A report of engagement and main issues raised has been prepared to accompany the Publication Draft (October 2017). This summarises the responses to consultation raised during the plan preparation process and how the Council's responded to the issues raised.

Key issues related to the need to make adequate provision to address housing need, including sufficient affordable housing, to address the economic and employment needs and to deliver the strategic vision and priorities, particularly the proposed new strategic development locations. These issues all have an equalities dimension and these have been taken into account as the plan has progressed.

## **APPENDIX B: Documents which have been referred to in this assessment**

- Census data (2011)
- National and Local Statistics
- Mosaic data
- [West of England Strategic Green Infrastructure \(GI\) Framework -  
http://www.westofengland.org/media/216918/gi%20framework%20020611.pdf](http://www.westofengland.org/media/216918/gi%20framework%20020611.pdf)
- Customer Insight: A portrait of diversity in North Somerset 2010
- Indices of Multiple Deprivation 2010
- North Somerset Gypsy and Traveller Accommodation Consultation 2011
- The South Gloucestershire & City of Bristol Gypsy & Traveller Accommodation Assessment (GTAA) 2013 -  
<http://www.southglos.gov.uk/environment-and-planning/planning/planning-policy/planning-policy-monitoring-reports/local-development-framework/gypsies-and-travellers/>
- West of England Gypsy and Traveller Accommodation Assessment (2007) -  
<http://www.southglos.gov.uk/documents/pte070602.pdf>
- North Somerset Sustainable Community Strategy 2008 – 2026
- South Gloucestershire Sustainable Community Strategy (2016) -  
<http://www.southglos.gov.uk/documents/Sustainable-Community-Strategy-2016.pdf>
- South Gloucestershire Community Profiles -  
<https://consultations.southglos.gov.uk/qf2.tif/251202/6317509.1/pdf/-/EB13.pdf>
- Strategic Housing Market Assessments -  
<http://www.southglos.gov.uk/housing/low-cost-home-ownership/strategic-housing-market-assessment/>
- South Gloucestershire Authority Monitoring Reports (AMRs), including Employment Land Review/Survey, Housing and Retail -  
<http://www.southglos.gov.uk/environment-and-planning/planning/planning-policy/planning-policy-monitoring-reports/authoritys-monitoring-report/>
- South Gloucestershire Strategic Flood Risk Assessments -  
<http://www.southglos.gov.uk/environment-and-planning/planning/planning-policy/planning-policy-monitoring-reports/local-development-framework/flood-risk/>
- Economic viability assessment affordable housing policy study (2013) -  
<http://www.southglos.gov.uk/documents/pte100265.pdf>
- Bristol City Council Ward Profiles 2017  
<https://www.bristol.gov.uk/statistics-census-information/new-wards-data-profiles>
- The Population of Bristol 2017  
<https://www.bristol.gov.uk/documents/20182/33904/Population+of+Bristol+September+2017.pdf/53020277-05de-a153-2052-aa080338bb57>
- Bristol's Quality of Life Survey 2016  
<https://www.bristol.gov.uk/statistics-census-information/the-quality-of-life-in-bristol>



# Full Council

## 14<sup>th</sup> November 2017

<b>Report of:</b>	Human Resources Committee
<b>Title:</b>	The Council's Pay Policy Statement for the period 15 <sup>th</sup> November 2017 to 31 <sup>st</sup> March 2019
<b>Ward:</b>	N/A
<b>Councillor Presenting Report:</b>	Councillor Kye Dudd (Chair of HR Committee)
<b>Contact Telephone Number:</b>	(0117) 92 22000

### Recommendation

That full Council adopts the Pay Policy Statement.

### Summary

The Localism Act 2011 requires local authorities to agree and publish a pay policy statement annually before the start of the financial year to which the statement relates. Any amendments must also be approved by full Council.

### The significant issues in the report are:

- New broad pay ranges for Group Directors and Directors have been informed by independent advice and benchmarking data from Korn Ferry Hay Group (a market leader in pay data and reward strategy). The ranges aim to allow flexibility in pay and to bridge the gap between the public/not-for-profit and private sectors and so encourage candidates from a range of backgrounds to apply.
- Starting pay will be within 10% of the minimum of each range unless otherwise agreed by the Employment and Remuneration Committee (currently HR Committee). Salaries above the mid-point are reserved for roles where there is clear evidence that the market rate is significantly higher than the mid-point.
- The proposed management structure will deliver full-year savings of around £750k through reducing the number of jobs at chief officer/deputy chief officer levels.
- The Employment and Remuneration Committee will give further consideration to pay progression within each of the new ranges and the potential use of variable pay in time for the next Pay Policy Statement in early 2019.

## Policy

1. The Localism Act 2011 requires local authorities (the Full Council) to agree and publish a pay policy statement annually before the start of the financial year to which the statement relates. It is recommended to full Council by the HR Committee.
2. Any amendments to the pay policy statement are also recommended by the HR Committee for approval by full Council.
3. The Council's current Pay Policy Statement covers the period up to 31<sup>st</sup> March 2018.

## Consultation

4. **Internal**  
The Mayor.  
Affected jobholders and trade unions are being consulted as part of consultation on the proposed management structure.
5. **External**  
None required.

## Context

6. The Pay Policy Statement explains the Council pay policies for its highest and lowest-paid employees. It is written and published in line with the Localism Act 2011 and guidance issued by the Secretary of State.
7. In light of the recently-published proposals regarding the Council's management structure, the current spot salaries (for Strategic Directors and Service Directors) are proposed to be replaced by new broad pay ranges for Group Directors and Directors, which have been informed by independent advice and benchmarking data from Korn Ferry Hay Group. The ranges aim to allow flexibility in pay and to bridge the gap between the public/not-for-profit and private sectors and so encourage candidates from a range of backgrounds to apply.
8. For Group Directors, the minimum of the range (£135,000) is roughly in line with the current median of the public sector and not-for-profit market (£134,608) and the maximum of the range (£165,000) is more or less in line with the current median of the industrial and services market (broadly-speaking the private sector, excluding financial services) (£164,109).
9. For Directors (Level 2), the minimum of the range (£94,000) is below the current average of the public sector and not-for-profit market (£100,611) and the maximum of the range (£120,000) mirrors the current median of the industrial and services market (£120,000).
10. For Directors (Level 1), the minimum of the range (£85,000) is below the current median of the public sector and not-for-profit market (£87,312) and the maximum of the range (£105,000) is between the current median (£102,779) and average (£107,813) of the industrial and services market.

11. Starting pay will be within 10% of the minimum of each range unless otherwise agreed by the Employment and Remuneration Committee (currently HR Committee). Salaries above the mid-point are reserved for roles where there is clear evidence that the market rate is significantly higher than the mid-point.
12. The proposed management structure will deliver full-year savings of around £750k through reducing the number of jobs at chief officer/deputy chief officer levels.
13. The Employment and Remuneration Committee will give further consideration to pay progression within each of the new ranges and the potential use of variable pay in time for the next Pay Policy Statement in early 2019.

### **Proposal**

14. That full Council adopts the Pay Policy Statement.

### **Other Options Considered**

15. None.

### **Risk Assessment**

16. Failure to pay in line with market rates is likely to hamper the Council's ability to recruit and retain effective leaders and managers.

### **Public Sector Equality Duties**

- 17a) Before making a decision, section 149 Equality Act 2010 requires that each decision-maker considers the need to promote equality for persons with the following "protected characteristics": age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation. Each decision-maker must, therefore, have due regard to the need to:
  - i) Eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Equality Act 2010.
  - ii) Advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to --
    - remove or minimise disadvantage suffered by persons who share a relevant protected characteristic;
    - take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of people who do not share it (in relation to disabled people, this includes, in particular, steps to take account of disabled persons' disabilities);

- encourage persons who share a protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
  - iii) Foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to –
    - tackle prejudice; and
    - promote understanding.
- 17b) An Equality Impact Assessment has not been completed because the Council’s senior management is currently subject to review and the jobholders to whom the new pay ranges will apply is unknown pending a selection process.

## **Legal and Resource Implications**

### **Legal**

*“This report fulfils the legal requirement placed on the Council by s.38(1) of the Localism Act 2011 to produce an annual pay policy statement.”*

Advice provided by Husinara Jones (Senior Practitioner (Solicitor)), 10<sup>th</sup> October 2017.

### **Financial**

#### **(a) Revenue**

*“Council is recommended to adopt the Pay Policy Statement as appended to this report. Key changes relate specifically to the replacement of existing Directors grades for a broader range of salaries deemed commensurate for the nature of each role type. Taken in conjunction with the proposed changes to the management structure, as outlined in paragraph 12 of the report, they are estimated to deliver savings of some £750k, contributing towards savings of some £1.6m over the two years 2017-2019, as set out in the 2017/18 budget report agreed by Full Council in February 2017.”*

#### **(b) Capital**

*“None”*

Advice provided by Chris Holme (Interim Head of Corporate Finance), 30<sup>th</sup> October 2017.

### **Land**

Not applicable.

### **Personnel**

*“The personnel implications are covered in the report.”*

Advice provided by John Walsh (Interim Service Director HR & Workforce), 30<sup>th</sup> October 2017.

## **Appendices:**

A – Draft Pay Policy Statement

## **LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

### **Background Papers:**

None.



**Bristol City Council****Pay Policy Statement  
for the period  
15<sup>th</sup> November 2017 to 31<sup>st</sup> March 2019****1. Introduction**

- a. It is essential that the Council attracts and keeps people with the right talents and commitment to lead and deliver great services to Bristol's citizens. At the same time the Council has to get the best value for the taxpayer.
- b. This Statement explains the Council pay policies for its highest and lowest-paid employees. It is written and published in line with the Localism Act 2011 (the Act) and guidance issued by the Secretary of State (the Guidance). It was approved by full Council on 14<sup>th</sup> November 2017.
- c. The Guidance is clear that decisions on pay policies should be made by councillors. The Council is committed to making sure that all councillors have a say on how pay decisions are made, especially about its highest-paid employees. To achieve this, the Statement is reviewed every year. The Mayor is consulted, and any proposals made are taken into account. The draft statement is considered by the Employment and Remuneration Committee and finally by full Council. Both meetings are open to the public.
- d. In line with the law (the Local Authorities (Elected Mayor and Mayor's Assistant) (England) Regulations 2002), the pay of the Mayor's Assistant is set as the Mayor thinks fit, within the financial resources available to the Council.
- e. As recommended by the Guidance, this Statement sets out clearly and separately its policies on each of the requirements listed in the relevant sections of the Act. The Guidance says that this is to help enable taxpayers to decide whether they are getting value for money in the way that public money is spent on local authority pay and reward.
- f. The Council is committed to equal pay for all its employees and to removing any bias in its pay systems related to age, disability, gender, race, religion or belief or on the grounds of being bisexual, gay, lesbian or transgender. Equal pay applies to all contractual terms and conditions as well as pay.
- g. The Council aspires to be a Living Wage Employer, as accredited by the Living Wage Foundation. The Council has paid its own employees no less than the Foundation Living Wage since 1<sup>st</sup> October 2014.

## **2. Development priority for 2017/19**

- a. The Council will work to reform its pay structure with the intention of implementing changes by 1<sup>st</sup> April 2019. The new pay structure will take the Foundation Living Wage as its starting point and will replace Bristol Grades 1 to 15. Proposals will be subject to equality impact assessment and will be negotiated with the trade unions.

## **3. Pay of the Council's highest-paid employees**

- a. The Council's highest-paid employees are currently Strategic Directors and Service Directors. The annual salary of Strategic Directors is £136,000. For Service Directors it is either £94,601 or £98,213.
- b. It has been proposed to replace the Strategic Director and Service Director jobs with new jobs of Group Directors and Directors. These new roles will be graded using the Hay methodology and the salaries informed by market (Public Sector & Not-For-Profit and Industrial & Service) data supplied by Korn Ferry Hay Group. For the period covered by this Statement the salary for Group Director roles will range from £135,000 to £165,000 with a mid-point of £150,000. The salary for Director (Level 2) roles will range from £94,000 to £120,000 with a mid-point of £107,000. The salary for Director (Level 1) roles will range from £85,000 to £105,000 with a mid-point of £95,000.

## **4. Pay of the Council's lowest-paid employees**

- a. The Council's lowest-paid employees are those who are paid the Foundation Living Wage. The Council has adopted this definition because it has decided that none of its employees should be paid less than the Foundation Living Wage. The Foundation Living Wage is currently £8.45 per hour, which equates to a minimum salary of £16,303 (based on a full-time week of 37 hours). The rate of the Foundation Living Wage is refreshed each November, and the Council applies the new rate from the following 1<sup>st</sup> April.
- b. Apprentices in their first year are paid £5 per hour. Apprentices in their second year are paid £5 per hour until they are 18 years old and then at the National Living Wage for their age. Apprentices in their third year are paid the Foundation Living Wage. An additional allowance of £25 per week is paid to apprentices who have left local authority care, and this is paid throughout their apprenticeship for as long as they live in independent accommodation.
- c. Interns, student placements and trainees are normally paid the Foundation Living Wage.

## **5. Relationship between the pay of the Council's highest and lowest-paid employees**

- a. Will Hutton's 2011 Review of Fair Pay in the Public Sector recommended that all public service organisations publish their top to median pay ratio to allow the public to hold them to account. The Government's terms of reference for the Hutton review suggested that no public sector manager should earn more than 20 times the lowest paid person in the organisation.

- b. The change in these ratios at the Council over recent years is shown in the following table:

<b>Date</b>	<b>Top to median pay ratio</b>	<b>Top to lowest salary ratio</b>
31 <sup>st</sup> March 2012	-	15.6:1
31 <sup>st</sup> March 2013	-	12.35:1
31 <sup>st</sup> March 2014	6.68:1	12.87:1
31 <sup>st</sup> March 2015	6.29:1	11.85:1
31 <sup>st</sup> December 2015	6.75:1	11.33:1
31 <sup>st</sup> December 2016	6.23:1	10.05:1

- c. For the period covered by this Statement the Council's top earner will be on a salary of up to £165,000 and the lowest-paid person will be on a salary of at least £16,303 (this amount will increase in line with the Foundation Living Wage on 1<sup>st</sup> April 2018 to £16,881). This means that the Council's top to lowest salary ratio will be less than 10.12:1 and 9.77:1 with effect 1<sup>st</sup> April 2018.

## **6. Pay of Group Directors and Directors when they start**

- a. Pay will be within 10% of the minimum of the range unless otherwise agreed by the Employment and Remuneration Committee. Payment above the mid-point is reserved for roles where there is clear evidence that the market rate is significantly higher than the mid-point.
- b. The Guidance says that full Council should have the opportunity to vote before salary packages totalling £100,000 or more are offered for new appointments. Through its Constitution full Council delegates this to the Employment and Remuneration Committee.

## **7. Increases and additions to pay for Group Directors and Directors**

- a. The pay of Group Directors and Directors will be reviewed each year through this Pay Policy Statement. The Council will be mindful of pay awards agreed by the Joint Negotiating Committee for Chief Executives of Local Authorities and the Joint Negotiating Committee for Chief Officers of Local Authorities. There will be no change to the ranges quoted in paragraph 3b above before 1<sup>st</sup> April 2019.

## **8. Performance-related pay for Group Directors and Directors**

- a. There is no performance-related pay for Group Directors and Directors.

## **9. Bonuses for Group Directors and Directors**

- a. There are no bonuses for Group Directors and Directors.

## **10. Pay of Group Directors and Directors when they leave**

- a. When a Group Director or Director leaves they will be paid in line with what they are entitled to under their contract of employment (their notice period is three months) and the Council's policies.

- b. The Guidance says that full Council should have the opportunity to vote before severance packages costing £100,000 or more are paid to employees leaving the Council. The Government intends to go further than this and cap the cost of an employee leaving a job in the public sector at £95,000. The Council is advised that this is likely to be implemented at some point in 2018. Councils may be given the authority to approve severance packages that cost more than £95,000 by a vote of full Council, but guidance on this has not yet been published. Until this change happens, the Council's current policy will continue, which is that the dismissal and/or compensation for loss of office of Group Directors and Directors is determined by the Employment and Remuneration Committee (except for the Head of Paid Service, Chief Finance Officer and Monitoring Officer, where this is a matter for full Council).
- c. The Government also intends to change the law so that someone who takes a severance package in the public sector can only work in the public sector again in the following 12 months if they pay back part of their severance payment. The Council is advised that this is also likely to be implemented at some point in early 2018. Until this change happens the Council's current policy will continue, which is that employees who leave due to voluntary severance will not be re-employed by the Council in a paid job or engaged directly or through a company on an "off-payroll" basis for 12 months after they leave. (Off-payroll means a person who is paid via a company rather than through the payroll as an employee). Employees who leave due to compulsory redundancy are free to apply for re-employment with the Council at any point after they've left.

#### **11. Paying Group Directors and Directors "off-payroll"**

- a. In line with IR35 the Council deducts and pays income tax and National Insurance contributions to HMRC in respect of payments made on or after 6<sup>th</sup> April 2017 to people engaged through personal service companies.

#### **12. Returning Officer fees**

- a. The Council's Returning Officer for elections and referenda is appointed by full Council. Fees are paid for these duties. They vary depending on the type of poll and are published prior to each election. Fees for most polls (including national elections and referenda) are set and paid by the Government (rather than the Council).

#### **13. More information about the pay of Group Director and Directors**

- a. The Council is committed to being open about its policies on pay. Approved pay policy statements are published on the Council's website at [www.bristol.gov.uk/council-spending-performance/senior-officers-pay](http://www.bristol.gov.uk/council-spending-performance/senior-officers-pay). Other information that the Council has to publish under the Local Government Transparency Code 2015 is available via that webpage.



# Full Council

## 14<sup>th</sup> November 2017

<b>Report of:</b>	Selection Committee
<b>Title:</b>	Designation of Head of Paid Service
<b>Ward:</b>	n/a
<b>Councillor Presenting Report:</b>	Cllr Kye Dudd (Chair of Selection Committee)
<b>Contact Telephone Number:</b>	(0117) 92 22000

### Recommendation

That the Head of Paid Service designation be rotated on an interim basis between the current Strategic Directors on a 3 month cycle until a permanent designation is made.

### Summary

The report seeks the agreement of the Full Council to the rotational arrangement proposed.

### The significant issues in the report are:

- The law requires that the appointment or dismissal of the Head of Paid Service be made by a meeting of the full Council. This includes interim arrangements
- There is no additional remuneration for the role of Head of Paid Service.
- The Head of Paid Service has 3 distinct roles:
  - Decision-maker in relation to posts below deputy chief officer (and responsible officer for the grant and supervision of exemptions from political restriction)
  - Principal advisor to the Council on staffing matters (except in respect of own pay and conditions of service)
  - Consider whether they should issue a formal "Section 4" report to the Council for its consideration regarding the proposals of the Head of Paid Service on how the Council's functions should be co-ordinated, the number and grades of staff required, and how those staff should be organised, appointed and managed.



---

## Policy

1. The Selection Committee is responsible for recommending the appointment of the Head of Paid Service to the Full Council.

## Consultation

2. **Internal**  
The “Executive Objections Procedure” (Annex 1 to the Officer Employment Rules within the Council’s Constitution) is underway.
3. **External**  
Not applicable.

## Context

4. The Council is required to appoint a Head of Paid Service.
5. The Head of Paid Service has 3 distinct roles:
  - 5.1. Decision-maker in relation to posts below deputy chief officer (and responsible officer for the grant and supervision of exemptions from political restriction)
  - 5.2. Principal advisor to the Council on staffing matters (except in respect of own pay and conditions of service)
  - 5.3. Consider whether they should issue a formal “Section 4” report to the Council for its consideration regarding the proposals of the Head of Paid Service on how the Council’s functions should be co-ordinated, the number and grades of staff required, and how those staff should be organised, appointed and managed.
6. There is no additional remuneration for the role of Head of Paid Service.
7. Under proposals published on 11<sup>th</sup> October 2017, all current substantive chief officers and deputy chief officers are subject to a review/re-design of the Council’s management structure.
8. Announcements will be made before the designated person changes so that Full Council will always be clear about who is the Head of Paid Service at any given time

## Proposal

**That the Head of Paid Service designation be rotated on an interim basis between the current Strategic Directors on a 3 month cycle until a permanent designation is made. See above**

## Other Options Considered

9. None.

---

## Risk Assessment

10. The risk of not appointing a Head of Paid Service is that the Council will be in breach of a statutory requirement and that decisions regarding the appointment, management and organisation of staff below deputy chief officer will not be taken.

## Public Sector Equality Duties

- 11a) Before making a decision, section 149 Equality Act 2010 requires that each decision-maker considers the need to promote equality for persons with the following “protected characteristics”: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation. Each decision-maker must, therefore, have due regard to the need to:
- i) Eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Equality Act 2010.
  - ii) Advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to --
    - remove or minimise disadvantage suffered by persons who share a relevant protected characteristic;
    - take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of people who do not share it (in relation to disabled people, this includes, in particular, steps to take account of disabled persons' disabilities);
    - encourage persons who share a protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
  - iii) Foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to –
    - tackle prejudice; and
    - promote understanding.
- 11b) An equality impact assessment has not been undertaken in relation to this proposal because it concerns an individual.

## Legal and Resource Implications

### Legal

*“The Local Authorities (Standing Orders) (England) Regulations 2001 set out the procedure a local authority must follow when appointing its head of paid service. These are mirrored in the Council’s constitution. This report ensures the Council meet its legal requirement to appoint a*

---

*Head of Paid Service.”*

Advice provided by Husinara Jones (Lawyer (Employment)), 25<sup>th</sup> October 2017.

**Financial**

**(a) Revenue**

*“There are no financial implications of this report as there is no change to current pay awarded as a result of this designation.”*

**(b) Capital**

Not applicable.

Advice provided by Kevin Lock (Finance Business Partner), 25<sup>th</sup> October 2017.

**Land**

Not applicable.

**Personnel**

*“The personnel implications of this appointment are set out in the report.”*

Advice provided by Mark Williams (HR Business Partner), 25<sup>th</sup> October 2017.

**Appendices:**

None.

**LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

**Background Papers:**

None.



## Full Council 14 November 2017



**Report of:** Shahzia Daya, Service Director – Legal & Democratic Services

**Title:** **Licensing Committee – membership changes**

**Ward:** Citywide

### Recommendation

**That Full Council notes the resignation of Councillor Nicola Beech from the Licensing Committee and approves the appointment of Councillor Steve Pearce to the committee.**

### Summary

The Licensing Committee is established under Section 6 of the Licensing Act 2003 and is a standing committee. Any vacancies on the committee must be filled by the Full Council. This task is non-delegable, i.e. only Full Council can decide who will serve on the committee.



### **Background and proposal**

1. The Council must have a licensing committee of between 10-15 members. As one of the largest licensing authorities in the country, Bristol has established a 15 member committee (14 members are currently appointed with one vacancy). Members serve on the committee until they either resign or are removed by the Full Council.
2. Councillor Nicola Beech has indicated that she wishes to resign from the committee.
3. Councillor Steve Pearce has indicated that he is willing to be appointed to the committee.
4. The Full Council is accordingly asked to **note the resignation of Councillor Nicola Beech from the Licensing Committee, and to approve the appointment of Councillor Steve Pearce to the committee.**



# Full Council

14 November 2017

<b>Report of:</b>	Service Director: Finance
<b>Title:</b>	Treasury Management Annual Report 2016/17
<b>Ward:</b>	City Wide
<b>Member Presenting Report:</b>	Deputy Mayor – Finance, Governance and Performance

## Recommendation

Council note the Annual Treasury Management Report for 2016/17, as detailed in Appendix A.

## Summary

The Council is required to produce an annual treasury management review of activities and the actual treasury indicators in accordance with Local Government regulations.

## The significant issues in the report are:

- The Council has complied with treasury management legislative and regulatory requirements during the period and all transactions were in accordance with the approved Treasury Management Strategy.
- The 2016–2019 Treasury Strategy identified a medium term borrowing requirement of £150m to support the existing and future Capital Programme. The Council's agreed policy is to defer borrowing while it has significant levels of cash balances (£70m at March 2017). The authority, as planned, borrowed £19.2m from the PWLB on the 31st March 2017 at a preferential rate for the Bristol Temple Meads East Regeneration, reducing the interest rate risk and liquidity risk exposed to the authority.
- The Council's long term debt at the 31 March 2017 was £434m with an average annual interest rate of 4.81%. Investments were £70m at the 31 March 2017 with an average annual interest rate of 0.57%.

---

## Policy

There are no policy implications as a direct result of this report.

## Consultation

### 1. Internal

Audit Committee, Strategic & Service Directors, and Deputy Mayor – Finance, Governance & Performance.

### 2. External

Capita – the Council’s external treasury management advisors

## Context

1. The Council’s treasury management activity is underpinned by CIPFA’s Code of Practice on Treasury Management (the Code), which requires local authorities to produce annually Prudential Indicators and a Treasury Management Strategy Statement on the likely financing and investment activity. The Code also requires reports to full Council mid-year and after the year end. The 2016/17 outturn report is set out as Appendix A.
2. The Code also requires the Council to nominate one of its Committees to have responsibility for scrutiny of its treasury management strategy, policy and activity. Council has delegated that responsibility to the Overview and Scrutiny Management Board and Audit Committee. Overall responsibility for treasury management remains with the Council. No treasury management activity is without risk; the effective identification and management of risk are integral to the Council’s treasury management objectives.
3. Treasury management is defined as:  
  
“The management of the local authority’s investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.”.

---

## Proposal

Council note the Annual Treasury Management Report for 2016/17, as detailed in Appendix A.

## Other Options Considered

Not applicable

## Risk Assessment

The principal risks associated with treasury management are:

Risk	Mitigation
Loss of investments as a result of failure of counterparties	Limiting the types of investment instruments used, setting lending criteria for counterparties, and limiting the extent of exposure to individual counterparties
Increase in the net financing costs of the authority due to borrowing at high rates of interest / lending at low rates of interest	Planning and undertaking borrowing and lending in light of assessments of future interest rate movements, and by undertaking most long term borrowing at fixed rates of interest (to reduce the volatility of capital financing costs)

## Public Sector Equality Duties

None necessary for this report

## Legal and Resource Implications

### Legal

The Council is under a duty to manage its resources prudently and therefore due consideration must always be given to its borrowing and lending strategy. A wide range of local authority financial activities, including borrowing, lending, financial management, and the approval of types of investment vehicle are governed by legislation and various regulations. The Council is obliged to comply with these.

---

**(Legal advice provided by Shahzia Daya - Service Director: Legal and Democratic Services)**

**Financial**

**(a) Revenues**

The financing costs arising from planned borrowing are provided for in the revenue budget and medium term financial plan. Any additional operating costs arising from capital investment must be contained within the revenue budget of the relevant department.

**(b) Capital**

Not Applicable

**(Financial advice provided by Jon Clayton – Principal Accountant)**

**Land**

Not applicable

**Personnel**

Not Applicable

**Appendices:**

Appendix A – Treasury Management Annual Report 2016/17

**LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

**Background Papers:**

None

### Treasury Management Annual Report 2016/17

#### Purpose of the report:

1. Under the CIPFA Code of Practice on Treasury Management (the Code) the Section 151 Officer is required to produce an outturn report on activities in the year to account for how the Strategy set at the start of the year has been implemented. This report meets the requirements of both the Code and the CIPFA Prudential Code for Capital Finance in Local Authorities (the Prudential Code).

#### Background

2. The Council's treasury management activity is underpinned by CIPFA's Code of Practice on Treasury Management (the Code), which requires local authorities to produce annually Prudential Indicators and a Treasury Management Strategy Statement on the likely financing and investment activity. The Code also requires reports to full Council mid-year and after the year end.
3. The Code also requires the Council to nominate one of its Committees to have responsibility for scrutiny of its treasury management strategy, policy and activity. Council has delegated this responsibility to the Overview and Scrutiny Management Board and Audit Committee. Overall responsibility for treasury management remains with the Council. No treasury management activity is without risk; the effective identification and management of risk are integral to the Council's treasury management objectives.
4. Treasury management is defined as:

*"The management of the local authority's investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."*

#### The Economy and Interest Rates for 2016/17

5. The two major landmark events that had a significant influence on financial markets in the 2016/17 were the UK EU referendum on 23 June and the election of President Trump in the USA presidential elections on 9 November.

The first event had an immediate impact in terms of market expectations of when the first increase in Bank Rate would happen, pushing it back from quarter 3 2018 to quarter 4 2019. At its 4 August meeting, the Monetary Policy Committee (MPC) cut the Bank Rate from 0.50% to 0.25% and the Bank of England's Inflation Report produced forecasts warning of a major shock to economic activity in the UK, which would cause economic growth to fall almost to zero in the second half of 2016. The MPC also warned that it would be considering cutting Bank Rate again towards the end of 2016 in order to support growth. In addition, it restarted quantitative easing, and introduced the "Term Funding Scheme" whereby cheap financing was made available to banks.

In the second half of 2016, the UK economy confounded the Bank's pessimistic forecasts of August. After a disappointing quarter 1 of only +0.2% GDP growth, the three subsequent quarters of 2016 increasing to produce an annual growth of +1.8%, which was nearly the fastest rate of growth of any of the G7 countries.

This meant that the MPC did not cut Bank Rate again after August. Since then, inflation has risen due to the effects of the sharp devaluation of sterling after the referendum. By the end of March 2017, sterling was 17% down against the dollar but had not fallen as far against the euro.

In February 2017, the latest CPI inflation figure had risen to 2.3%, above the MPC's inflation target of 2%. However, the MPC's view was that it would discount near term supply side driven inflation, (i.e. not raise Bank Rate), caused by sterling's devaluation, despite forecasting that inflation would reach nearly 3% during 2017 and 2018. This outlook, however, is dependent on domestically generated inflation, (i.e. wage inflation), continuing to remain subdued despite the fact that unemployment is at historically very low levels and is on a downward trend. Market expectations for the first increase in Bank Rate moved forward to quarter 3 2018 in response to increasing concerns around inflation.

6. USA. Quarterly growth in the US has been very volatile during 2016 but a strong performance since mid-2016, and rising inflation, prompted the Federal Reserve into raising rates in December 2016 and March 2017. The US is the first major western country to start on a progressive rise in rates. Overall growth in 2016 was 1.6%.
7. EU. The EU is furthest away from an upswing in rates; the European Central Bank (ECB) has cut rates into negative territory, provided large tranches of "cheap" financing and carrying out major quantitative easing purchases of debt during the year to boost growth and to get inflation up from near zero towards its target of 2%. These purchases have resulted in depressed bond yields in the EU, but, towards the end of 2016, yields rose, probably due at least in part to rising political concerns around the positive prospects for populist parties and impending general elections in 2017 in the Netherlands, France and Germany. The action taken by the ECB has resulted in economic growth improving in the eurozone to an overall figure of 1.7% for 2016, with Germany achieving a rate of 1.9% as the fastest growing G7 country.
8. President Trump's election and promise of fiscal stimulus, which are likely to increase growth and inflationary pressures in the US, have resulted in US Treasury yields rising sharply. Gilt yields in the UK have been caught between these two influences and the result is that the gap in yield between US treasuries and UK gilts has widened during 2016/17 due to market perceptions that the UK is still likely to be two years behind the US in starting on an upward trend in rates despite four years of strong growth.
9. China and emerging market countries. At the start of 2016, there were considerable fears that China's economic growth could be heading towards a hard landing, which could destabilise some emerging market countries particularly exposed to a Chinese economic slowdown and / or to the effects of a major reduction in revenue from low oil prices. These fears have largely subsided and oil prices have partially recovered so, overall, world growth prospects have improved during the year.



10. Equity markets. The result of the referendum, and the consequent devaluation of sterling, boosted the shares of many FTSE 100 companies which had major earnings which were not denominated in sterling. The overall trend since then has been upwards and received further momentum after Donald Trump was elected President as he had promised a major fiscal stimulus to boost the US economy and growth rate.

### Treasury position as at 31 March 2017

11. The table below indicates the balance of borrowing and investments at the beginning and end of the year:

	31 March 2016		31 March 2017	
	£m	Rate %	£m	Rate %
Long Term Debt (fixed rates) - PWLB	292	5.09	311	5.09
Long Term Debt (fixed rates) – LOBOS	120	4.07	100	4.14
Long Term Debt (fixed rates) – Market	3	6.88	23	4.24
Short Term Borrowing	2	0.55	-	-
<b>Total borrowing</b>	<b>417</b>	<b>4.81</b>	<b>434</b>	<b>4.81</b>
Investments	146	0.63	70	0.57
<b>Net Borrowing Position</b>	<b>271</b>		<b>364</b>	

12. In June 2016, Barclays Bank removed their options inherent within two LOBO loans amounting to £20m at no cost to the authority. These loans are now classed as market loans with their rates remaining fixed until maturity reducing the interest rate / re-financing risk of the authority.

13. The total borrowing excludes accrued interest of £5m (£5m at 31/3/16) and the outstanding finance on PFI and service contracts of £146m at 31 March 2017 (£152m at 31/3/16).

14. During the year, the authority as planned, borrowed £19.2m from the PWLB on the 31st March 2017 at a preferential rate for the Bristol Temple Meads East Regeneration (Arena) scheme reducing the interest rate risk and liquidity risk exposed to the authority.

15. The authority also has long term service investments costing £18.45m primarily relating to the equity investments in Bristol Holdings Company (£15.95m) and the Bristol Port Company (£2.5m). In addition the authority recently invested £5m in a long term treasury investment in a property fund to support Homelessness.

16. The Net debt has increased by £93m from £271m to £364m primarily due to;

- Funding of the capital programme financed by borrowing (£67m)
- Application / use of Reserves (£41m)
- Other changes to working capital / provisions +£15m

### Long Term Borrowing – Strategy and outturn

17. The 2016–2019 Treasury Strategy (approved 16th February 2016) identified a medium term

borrowing requirement of £150m to support the existing and future Capital Programme with the debt servicing costs predominately met from revenue savings from capital investment and the economic development fund. The £150m was planned to be borrowed equally in 2016/17 (£75m) and 2017/18 (£75m).

18. The Council's Strategy is also to defer borrowing while it has significant levels of cash balances (£70m at March 2017 and £146m at March 2016). Deferring borrowing will reduce the "net" revenue interest cost of the Authority as well as reducing the Councils exposure to counter party risk for its investments. The Council recognises that utilising investments in lieu of borrowing clearly has a finite duration and that future borrowing will be required to support capital expenditure (see 2016/17 Treasury Management Strategy approved by Council 16<sup>th</sup> February 2016).

[https://democracy.bristol.gov.uk/Data/Full%20Council/201602161400/Agenda/0216\\_5.pdf](https://democracy.bristol.gov.uk/Data/Full%20Council/201602161400/Agenda/0216_5.pdf)

19. Borrowing activity in year was in accordance with the Strategy approved at the beginning of the year:

- **Borrowing** – The authority, as planned, borrowed £19.2m from the PWLB on the 31st March 2017 at a preferential rate for the Bristol Temple Meads East Regeneration (Arena) scheme reducing the interest rate risk and liquidity risk exposed to the authority. No further borrowing was undertaken, as the authority maintained higher levels of investments than originally anticipated for a variety of reasons including the time taken to progress capital schemes where the source of financing is external borrowing.
- **Rescheduling** – No debt rescheduling activity was undertaken in 2016/17. As set out in the Treasury Mid-Year report the total life cycle cost of rescheduling loans on a discounted cash-flow basis has been reviewed with no loans providing a positive cash-flow benefit to the authority. This would in part be due to large early repayment penalties that the authority will incur, circa £261m penalty to repay the PWLB loans (£311m) early as at 31<sup>st</sup> March 2017.
- **Repayment** – A short term loan (£2m for 1 day) was repaid on the 1<sup>st</sup> April 2016.

### **Annual Investment Strategy and Outturn**

20. After the EU referendum, Bank Rate was cut from 0.5% to 0.25% on 4 August and remained at that level for the rest of the year. Market expectations as to the timing of the start of monetary tightening started the year at quarter 3 2018, but then moved back to around the end of 2019 in early August before finishing the year back at quarter 3 2018.
21. Deposit rates continued into the start of 2016/17 at previous depressed levels falling during the first two quarters and fell even further after the 4 August MPC meeting resulted in a large tranche of cheap financing being made available to the banking sector by the Bank of England. Rates made a weak recovery towards the end of 2016 but then fell to back at the end of the year.
22. Security of capital remained the Council's main investment objective. This was maintained by following the Council's policy for assessing institutions to which the council might lend. This

policy sets out the approach for choosing investment counterparties, and is based on credit ratings provided by the three main credit rating agencies supplemented by additional market data (such as rating outlooks, credit default swaps, bank share prices etc.).

23. Investments held by the Council - the Council maintained an average balance of £146m (£245m 2015/16) of internally managed funds. The internally managed funds received an average return of 0.57% (0.63% 2015/16). The comparable performance indicator is the average 7-day LIBID rate, which was 0.20%.

### **Compliance with Treasury Limits and Treasury Related Prudential Indicators**

24. The Council can confirm that:

- All treasury related transactions were undertaken by authorised officers and within the limits and parameters approved by the Council;
- All investments were to counterparties on the approved lending list
- The Council operated within the Prudential Indicators within Appendix 1.

### **Performance Indicators set for 2016/17**

25. One of the key requirements in the Code is the formal introduction of performance measurement relating to investments, debt, and capital financing activities. Whilst investment performance criteria have been well developed and universally accepted, debt performance indicators continue to be a more problematic area with the traditional average portfolio rate of interest acting as the main guide. The Council's performance indicators were set out in the Annual Treasury Management Strategy.

26. The following performance indicators have been set:

- £19.2m long-term borrowing was undertaken in 2016/17 @ 2.21%. The target rate for the year is 25 year PWLB, the annual average for the year was 2.92%.
- Debt – Average rate movement year on year
- Pool rate in 2015/16: 4.81 %
- Pool rate in 2016/17: 4.81%
- Investments – Internal returns above the 7 day LIBID rate
- Average rate for the year 0.57% vs. annual average 7 day LIBID of 0.20%

### **Consultation and scrutiny input**

27. The report does not require any internal consultation to be undertaken. The report has been discussed with the Council's external treasury management advisers.

## Risk Assessment

28. The principal risks associated with treasury management are:

<b>Risk</b>	<b>Mitigation</b>
Loss of investments as a result of failure of counterparties	Limiting the types of investment instruments used, setting lending criteria for counterparties, and limiting the extent of exposure to individual counterparties
Increase in the net financing costs of the authority due to borrowing at high rates of interest / lending at low rates of interest	Planning and undertaking borrowing and lending in light of assessments of future interest rate movements, and by undertaking most long term borrowing at fixed rates of interest (to reduce the volatility of capital financing costs)

### Public sector equality duties:

29. There are no proposals in this report, which require either a statement as to the relevance of public sector equality duties or an Equalities Impact Assessment.

### Environmental checklist / eco impact assessment

30. There are no proposals in this report which have environmental impacts

### Legal and Resource Implications

31. Legal- the Council is under a duty to manage its resources prudently and therefore due consideration must always be given to its borrowing and lending strategy. A wide range of local authority financial activities, including borrowing, lending, financial management, and the approval of types of investment vehicle are governed by legislation and various regulations. The Council is obliged to comply with these.

Advice provided by Shahzia Daya (Service Director: Legal and Democratic Services)

### Financial

#### (a) Revenue

32. The financing costs arising from planned borrowing are provided for in the revenue budget and medium term financial plan.

Advice given by Jon Clayton (Principal Accountant)

#### (b) Capital

33. There is no direct capital investment implications contained within this report.

## **Land**

34. There are no direct implications for this report.

## **Personnel**

35. There are no direct implications for this report.

## **Appendices:**

Appendix 1: Treasury Management Annual Report 2016/17

## **LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

### **Background Papers:**

36. Treasury Management Strategy 2016/17

[https://democracy.bristol.gov.uk/Data/Full%20Council/201602161400/Agenda/0216\\_5.pdf](https://democracy.bristol.gov.uk/Data/Full%20Council/201602161400/Agenda/0216_5.pdf)

## **Appendix 1**

### **Annual Report on the Treasury Management Service 2016/17 (Incorporating Outturn Prudential Indicators)**

#### **Introduction**

1. This report summarises:

- The capital activity during the year
- What resources the Council applied to pay for this activity;
- The impact of this activity on the Council's underlying indebtedness (the Capital Financing Requirement);
- The reporting of the required prudential indicators;
- Overall treasury position identifying how the Council has borrowed in relation to this indebtedness, and the impact on investment balances;
- A summary of interest rate movements in the year;
- The detailed debt activity;
- The detailed investment activity;
- Local Issues

#### **The Council's Capital Expenditure and Financing 2016/17**

2. The Council undertakes capital expenditure to invest in the acquisition and enhancement of long-term assets. These activities may either be:

- Financed immediately through the application of capital or revenue resources (capital receipts, capital grants, revenue contributions etc.), which has no resultant impact on the Council's borrowing need; or
- If insufficient financing is available, or a decision is taken not to apply resources, the capital expenditure will give rise to a borrowing need.

3. The actual capital expenditure forms one of the required prudential indicators. The table below shows the actual capital expenditure and how this was financed.

	<b>2015/16 Actual £m</b>	<b>2016/17 Original Budget £m</b>	<b>2016/17 Final Budget £m</b>	<b>2016/17 Actual £m</b>
Non-HRA capital expenditure	157	134	157	147
HRA capital expenditure	43	56	56	49
<b>Total capital expenditure</b>	<b>200</b>	<b>190</b>	<b>213</b>	<b>196</b>
<b>Resourced by:</b>				
Capital receipts	18	29	24	15
Capital grants	76	38	63	62
HRA Self Financing	37	32	32	34
Prudential borrowing	39	81	81	67
Revenue	30	10	13	18
<b>Total Resources</b>	<b>200</b>	<b>190</b>	<b>213</b>	<b>196</b>

### **The Council's Overall Borrowing Need**

4. The Council's underlying need to borrow is called the Capital Financing Requirement (CFR). This figure is a gauge of the Council's debt position. It represents 2016/17 and prior years' net capital expenditure that has not yet been paid for by revenue or other resources.
5. Part of the Council's treasury activities is to address this borrowing need, either through borrowing from external bodies, or utilising temporary cash resources within the Council.
6. Reducing the CFR – Whilst under treasury management arrangements actual debt can be borrowed or repaid at any time within the confines of the annual treasury strategy, the Council is required to make an annual revenue charge to reduce the CFR – effectively a repayment of the Non-Housing Revenue Account (HRA) borrowing need. There is no statutory requirement to reduce the HRA CFR.
7. This statutory revenue charge is called the Minimum Revenue Provision - MRP. The total CFR can also be reduced by:
- the application of additional capital resources (such as unapplied capital receipts); or
  - charging more than the statutory revenue charge (MRP) each year through a Voluntary

Revenue Provision (VRP).

8. The Council's 2016/17 MRP Policy (as required by CLG Guidance) was originally approved on the 16<sup>th</sup> February 2016 and revised on the 13<sup>th</sup> December 2016 because the current MRP policy was created in 2007 and has been in place for 9 years.
9. A review of this policy was undertaken to ensure it remains prudent. This review resulted in a change to the MRP policy that will generate a medium-term revenue saving through the re-profiling of the provision. This saving has been made available to assist with mitigating the current revenue budgetary pressures along with providing a stable and deliverable financial position going forwards whilst ensuring the prudent management of the Council's finances generally.
10. The Council's CFR for the year is shown below, and represents a key prudential indicator. Accounting rule changes in previous years has meant that PFI schemes are now included on the balance sheet, which increases the Council's borrowing need, the CFR. No borrowing is actually required against these schemes as a borrowing facility is included in the contract.

<b>CFR</b>	<b>General Fund 31 March 2016 Actual £m</b>	<b>General Fund 31 March 2017 Actual £m</b>	<b>HRA 31 March 2016 Actual £m</b>	<b>HRA 31 March 2017 Actual £m</b>	<b>Total CFR 31 March 2017 Actual £m</b>
<b>Opening balance</b>	<b>470</b>	<b>489</b>	<b>245</b>	<b>245</b>	<b>734</b>
Add unfinanced capital expenditure (as above)	39	67	-	-	67
Less MRP/VRP	(11)	(8)	-	-	(8)
Less PFI & finance lease repayments	(9)	(5)	-	-	(6)
<b>Closing balance</b>	<b>489</b>	<b>543</b>	<b>245</b>	<b>245</b>	<b>787</b>

**Treasury Position at 31 March 2017**

11. Whilst the Council's gauge of its underlying need to borrow is the CFR, Finance can manage the Council's actual borrowing position by either:
  - Borrowing to the CFR; or
  - Choosing to utilise some temporary internal cash flow funds in lieu of borrowing or
  - Borrowing for future increases in the CFR (borrowing in advance of need).



12. The figures in this report are based on the principal amounts borrowed and invested and so may differ from those in the final accounts by items such as accrued interest.

	31 March 2016		31 March 2017	
	Principal £m	Average Rate %	Principal £m	Average Rate %
Fixed Interest Rate Debt	417	4.81	434	4.81
Variable Interest Rate Debt	-	-	-	-
PFI / Service Contracts	152	-	146	-
<b>Total Debt</b>	<b>569</b>	<b>4.81</b>	<b>580</b>	<b>4.81</b>
Debt administered of behalf of Unitary Authorities <small>(Ex Avon Debt)</small>	(48)	-	(46)	-
<b>Revised Debt</b>	<b>521</b>	<b>4.81</b>	<b>534</b>	<b>4.81</b>
Capital Financing Requirement	734		787	
Over/(Under) borrowing	(213)		(253)	
<b>Investment position</b>				
Investments (Fixed & Call)	146	0.63	70	0.57
<b>Net borrowing position (excl leasing arrangements)</b>	<b>271</b>	<b>-</b>	<b>364</b>	<b>-</b>

13. The fixed Interest rate debt is apportioned between the General Fund and HRA as set out in the table below.

Fixed Interest Rate Debt	31 March 2016		31 March 2017	
	£m		£m	
	Principal £m	Average Rate%	Principal £m	Average Rate%
General Fund	177	4.98	196	4.98
HRA	240	4.69	240	4.69
Total	417	4.81	434	4.81

14. The maturity structure of the debt portfolio (excluding accrued interest) was as follows:

	Approved Min Limit%	Approved Max Limit%	31 March 2016		31 March 2017	
			Actual £m	%	Actual £m	%
Under 12 Months	0	20	2	0.5	3	0.7
1 to 2 years	0	20	3	0.7	-	-
2 to 5 years	0	40	-	-	-	-
5 to 10 years	0	40	20	4.8	20	4.6
10 years and over	25	100	392	94.0	411	94.7
<b>Total</b>			<b>417</b>	<b>100</b>	<b>434</b>	<b>100</b>

15. The Council hold £100m of LOBOS with maturities averaging 50 years. Inherent within these

loan instruments are options (averaging an option every 4 years) that could give rise to the debt being repaid early. These loans are regularly reviewed with the current and expected structure of interest rates. The risk of the lenders exercising their options is currently low for the short to medium term. Therefore, the maturity of these loans in above table is based on their maturity date, 10 years and over.

16. The Council will continually review these loans in accordance with economic forecasts and will update the maturity structure of the debt portfolio accordingly and assess the future re-financing risks exposed to the authority and report any changes within future monitoring reports.
17. The authority's borrowing strategy is to delay borrowing and use its existing resources to support the Capital Programme to reduce its exposure to counterparty risk and the net interest cost of the authority. The authority, as planned, borrowed £19.2m from the PWLB on the 31st March 2017 at a preferential rate for the Bristol Temple Meads East Regeneration (Arena) scheme reducing the interest rate risk and liquidity risk exposed to the authority. No further borrowing was undertaken, as the authority maintained higher levels of investments than originally anticipated for a variety of reasons including the time taken to progress capital schemes where the source of financing was external borrowing.

#### **Prudential Indicators and Compliance Issues**

18. Some of the prudential indicators provide either an overview or specific limits on treasury activity. These are shown below:
19. **Net Borrowing and the CFR** - In order to ensure that borrowing levels are prudent over the medium term the Council's external borrowing, net of investments, must only be for a capital purpose. The table below highlights the Council's net borrowing position against the CFR. The Council has complied with this prudential indicator.

	<b>31 March 2016 Actual £m</b>	<b>31 March 2017 Actual £m</b>
Net borrowing position	271	363
CFR (excluding PFI)	582	641

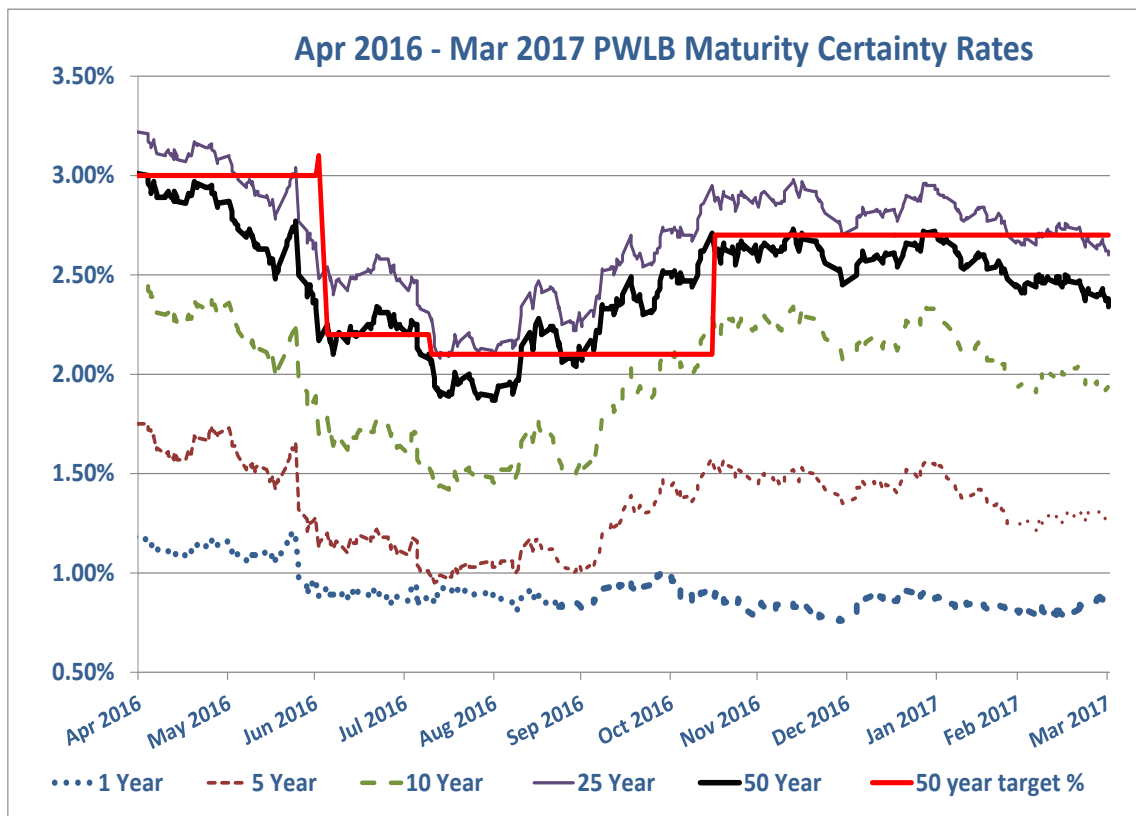
20. **The Authorised Limit** - The Authorised Limit is the "Affordable Borrowing Limit" required by Section 3 of the Local Government Act 2003. Once agreed the authorised limit cannot be breached. The Council does not have the power to borrow above this level. The table below demonstrates that during 2016/17 the Council has maintained gross borrowing within its Authorised Limit.
21. **The Operational Boundary** – The Operational Boundary is the expected borrowing position of the Council during the year. Periods where the actual position is either below or over the Boundary is acceptable subject to the Authorised Limit not being breached.
22. **Actual financing costs as a proportion of net revenue stream** - This indicator identifies the cost of capital (borrowing and other long term obligation costs net of investment income)

against the net revenue stream.

	<b>2016/17 £m</b>
Authorised Limit	799
Operational Boundary	589
Average gross borrowing position (including PFI)	579
Financing costs as a proportion of net revenue stream:	
General Fund	7.69%
HRA	8.66%

### Borrowing Rates in 2016/17

23. PWLB borrowing rates - the graph below shows how PWLB certainty rates have fluctuated throughout the year. PWLB rates fell from April to June and then further following the referendum and Bank Rate cut, before staging a partial recovery through to December and then falling slightly through to the end of March.

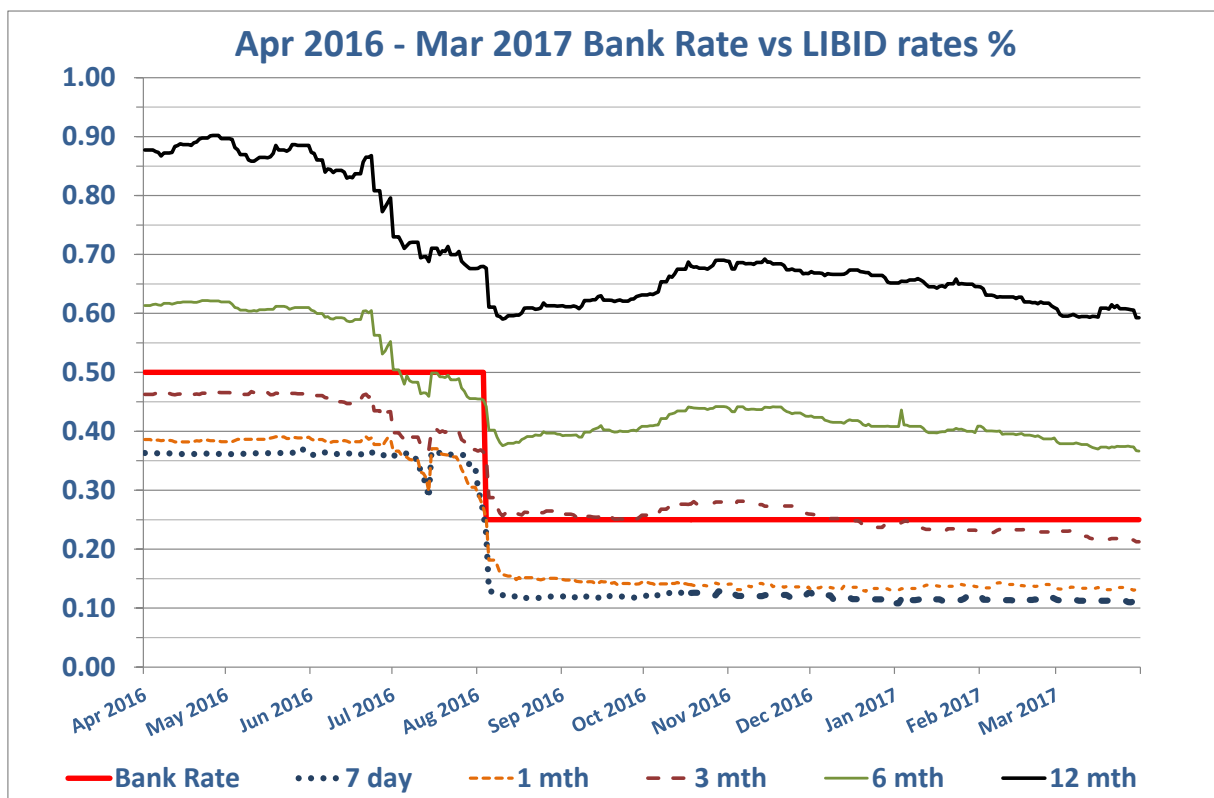


24. **Summary of Debt Transactions** – One new loan for £19.2 was drawn from the PWLB on the 31<sup>st</sup> March 2017 for a period of 46 years at a rate of 2.21% to fund capital expenditure for the Bristol Temple Meads East Regeneration (Arena) project.

25. The average rate of interest for long term borrowing for the year was 4.81%.

**Investment Rates in 2016/17**

26. After the EU referendum, Bank Rate was cut from 0.5% to 0.25% on 4 August and remained at that level for the rest of the year. Market expectations as to the timing of the start of monetary tightening started the year at quarter 3 2018, but then moved back to around the end of 2019 in early August before finishing the year back at quarter 3 2018. Deposit rates continued into the start of 2016/17 at previous depressed levels but then fell during the first two quarters and fell even further after the 4 August MPC meeting resulted in a large tranche of cheap financing being made available to the banking sector by the Bank of England. Rates made a weak recovery towards the end of 2016 but then fell to further lows in March 2017



27. The Council’s investment policy is governed by CLG guidance, which has been implemented in the annual investment strategy approved by the Council on 16<sup>th</sup> February 2016. This policy sets out the approach for choosing investment counterparties, and is based on credit ratings provided by the three main credit rating agencies supplemented by additional market data (such as rating outlooks, credit default swaps, bank share prices etc.). The investment activity during the year conformed to the approved strategy, and the Council had no liquidity difficulties.

## Local Issues

28. **Ethical Investment Policy**- The “Ethical Investment Policy” was approved by Cabinet on 15th December 2011 (updated February 2015). There are no breaches to report.

## Regulatory Framework, Risk and Performance

29. The Council’s treasury management activities are regulated by a variety of professional codes and statutes and guidance:

- The Local Government Act 2003 (the Act), which provides the powers to borrow and invest as well as providing controls and limits on this activity;
- The Act permits the Secretary of State to set limits either on the Council or nationally on all local authorities restricting the amount of borrowing which may be undertaken (although no restrictions have been made);
- Statutory Instrument (SI) 3146 2003, as amended, develops the controls and powers within the Act;
- The SI requires the Council to undertake any borrowing activity with regard to the CIPFA Prudential Code for Capital Finance in Local Authorities;
- The SI also requires the Council to operate the overall treasury function with regard to the CIPFA Code of Practice for Treasury Management in the Public Services;
- Under the Act the CLG has issued Investment Guidance to structure and regulate the Council’s investment activities.
- Under section 238(2) of the Local Government and Public Involvement in Health Act 2007 the Secretary of State has taken powers to issue guidance on accounting practices. Guidance on Minimum Revenue Provision was issued under this section on 8<sup>th</sup> November 2007.

30. The Council has complied with all of the above relevant statutory and regulatory requirements which require the Council to identify and, where possible, quantify the levels of risk associated with its treasury management activities. In particular its adoption and implementation of both the Prudential Code and the Code of Practice for Treasury Management means both that its capital expenditure is prudent, affordable and sustainable, and its treasury practices demonstrate a low risk approach.

31. The Council has ensured that the principles of security, liquidity and yield have been adhered to within the treasury operation. This implies that the safeguarding of the principal investment with a suitable counterparty remains the Council’s highest priority followed by liquidity (i.e. ease of access to the principal amount deposited) and yield (i.e. return) on investment.



# Full Council

14 November 2017

**Report of:** Shahzia Daya, Service Director – Legal & Democratic Services

**Title:** **Information report – Decisions taken under special urgency provisions**

**Ward:** Citywide

## RECOMMENDATION

Full Council is asked to note the use of special urgency provisions (APR 16) in relation to decisions that have been taken by Cabinet in respect of :

- Local Growth Fund Bid – 7 March 2017 Cabinet
- Dunmail Housing Scheme – 16 May 2017 Cabinet
- Parkview offices lease change – 26 June 2017 Cabinet
- Leasing out of offices at 100 Temple Street for Department of Work & Pension (DWP) – 19 September Cabinet
- Street Lighting Contract extension – 19 September Cabinet



## Background / information

1. Statute and the Council's constitution provide that notification of decisions that are intended to be taken by the Executive must be published 28 days before the decision is taken, and that the papers in relation to that decision must be published not less than 5 working days before the decision to be taken
2. There are however exceptions in law and the constitution to these timescales so that shorter notice can be given in certain circumstances.
3. The constitution provides (**Access to Information rules APR15**), that if a matter which is likely to be a key decision has not been included in the forward plan ( to give 28 days' notice), the decision may still be taken if:
  - (a) the decision must be taken by such a date that it is impracticable to defer the decision until it has been included in the next forward plan and until the start of the first month to which the next forward plan relates;
  - (b) the proper officer has given notice to the chair and members of a relevant overview and scrutiny committee in writing, of the matter to which the decision is to be made;
  - (c) the proper officer has made copies of that notice available to the public at the offices of the council; and
  - (d) at least five clear working days have elapsed since the proper officer complied with (a) and (b).
4. If an urgent decision needs to be taken and 5 clear working days cannot be given as set out in APR 15 above, APR 16 provides that in cases of special urgency a decision may still be taken if the decision taker obtains the agreement of the chair of a relevant overview and scrutiny committee that the taking of the decision cannot be reasonably deferred.
5. The constitution also requires that cases where special urgency provisions have been required will be reported to the Full Council for information.
6. This report informs Full Council of the following decisions taken under special urgency provisions:

### **Local Growth Fund Bid – 7 March 2017 Cabinet**

Approval for Bristol City Council to submit a bid to the Local Enterprise Partnership's 'Local Growth Fund' for £2.6m (2017-2018) on behalf of the West of England Authorities, to provide continued funding to implement sustainable travel projects. Bristol's share of this bid is for £1.07m.

### **Dunmail Housing Scheme – 16 May 2017 Cabinet**

1. Agreed that the Council provides a rental guarantee, not exceeding £500k over the life of the lease, to secure investment to develop 40 Private Rent Sector homes as set out in Appendix A of the report.

2. Agreed that the Council seeks a share in any financial or equivalent returns, where these are achieved, and delegates to the Strategic Director Place and the Service Director Finance to agree the terms of an arrangement.

**Parkview offices lease change – 26 June 2017 Cabinet**

1. Agreed to the surrender of the Council's current sub-lease of office accommodation at Parkview Office Campus and re-grant of a new lease capable of early termination by the Council.
2. The Strategic Director – Resources be authorised to approve the terms of the surrender and re-grant subject to briefing the Cabinet Member for Property.
3. The Strategic Director – Resources be authorised to approve arrangements for relocation of all staff currently working from Parkview to other office locations of the Council and clearance of the leased areas at Parkview.

**Leasing out of offices at 100 Temple Street for Department of Work & Pension (DWP) – 19 September Cabinet**

Approved the additional spend on the works to accommodate the occupation of the ground and first floor Temple Street.

**Street Lighting Contract extension – 19 September Cabinet**

1. Approved the extension of existing contract to July 2018.
  2. Approved procurement of a new Street Lighting Maintenance and Installation Contract for three years (July 2018 – July 2021).
  3. Agreed to support the development of the street lighting asset register to enable procurement of a performance 'Output' contract in 2021.
  4. Approved delegated authority to the Strategic Director, Neighbourhoods to determine the procurement approach and in consultation with the Portfolio holder and S151 Officer, to award the contract and to conclude all necessary documentation to give effect to the above.
- 
7. This report is presented for Full Council's information, as required by the constitution.



# Full Council

14 November 2017



**Report of:** Shahzia Daya, Service Director – Legal & Democratic Services

**Title:** Information report - Exception to call-in procedure

**Ward:** Citywide

## RECOMMENDATION

**Full Council is asked to note an exception to the call-in procedure that has been made since the last report in March 2017 in respect of the following decision taken by the Mayor at Cabinet:**

- **Decision taken at Cabinet on 27 July 2017**  
**Subject: Current West of England Partnership Waste Contract - exempt Report**



## **Background / information**

1. The principle of call-in of executive decisions is firmly embedded within the Council's constitution (Overview and Scrutiny procedure rules).
2. In general, subject to the prescribed constitutional criteria being met, and the relevant procedure being followed, all executive decisions taken by the Mayor at Cabinet are potentially subject to the call-in procedure.
3. The constitution does provide (under Overview and Scrutiny procedure rule 17j) (OSR17j), however, for the call-in procedure not to apply in circumstances where an urgent decision needs to be taken by the executive, and where any delay likely to be caused by the call-in process would seriously prejudice the Council's or the public's interests. In these circumstances, the Head of Paid Service and the Monitoring Officer must agree, in consultation with the Mayor, taking into account all relevant circumstances, that it is reasonable for the call-in procedure to not apply.
4. The constitution also requires that such exceptions to the call-in procedure are reported to the Full Council for information.
5. This report informs Full Council of one exception made to the call-in procedure since the last report to Full Council, as follows:

### **Current West of England Partnership Waste Contract**

The report was not published and the decision was considered in private by the Cabinet by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 under Category 3 :- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

The recommendations were approved as set out in the report.

With regard to the above decisions, as per OSR17j, the Head of Paid Service and Monitoring Officer, in consultation with the Mayor, were satisfied that any delay likely to be caused by a call-in process would seriously prejudice the Council's or the public's interests.

6. This report is presented for Full Council's information, as required by the constitution.

# Full Council

14 November 2017



**Report of:** Shahzia Daya, Service Director – Legal & Democratic Services

**Title:** **Information report – Report of Ombudsman decisions in respect of the Council 2016-17**

**Ward:** Citywide

## RECOMMENDATION

**Full Council is asked to note the complaints upheld by the Ombudsman in respect of the Council in the year ending 31 March 2017.**



---

## Background / information

1. This report is presented in line with the duty to report to the Full Council where findings of maladministration or fault have been made by the Ombudsman, summarising the findings made.
2. The Ombudsman has sent to the Council all findings made in the year ending the 31<sup>st</sup> March 2017. No public reports have been made in respect of the Council in that time. However, the requirement applies to all Ombudsman complaint decisions, not just those that result in a public report.
3. In respect of cases where routine mistakes and service failures have been made, and the authority has agreed to remedy the complaint by implementing the recommendations made following an investigation, the Ombudsman is of the view that the duty to report is satisfactorily discharged if the Monitoring Officer makes a periodic report to the Council summarising the findings on all upheld complaints over a specific period of time.
4. Appendix 1 sets out a summary of the findings made and remedies agreed.
5. The information was presented to the Audit Committee on the 21<sup>st</sup> September, where it was agreed that a report should be presented to Full Council, together if possible with comparator information from core cities.
6. Appendix 2 sets out the information requested by the Audit Committee and also includes information in respect of the Council's neighbouring authorities.
7. This report is presented for Full Council's information, as required by the statute and the Ombudsman's guidance

## **APPENDIX 1 - Report of all Upheld Local Government Ombudsman (LGO) complaints in 2016/2017**

---

Bristol City Council (LGO REF: 15 013 665)

Statement: Upheld

### **Special Educational needs**

11-Apr-2016

**Summary:** The Ombudsman found fault on Ms K's complaint that the Council failed for 14 months to provide her son with the speech and language therapy set out in his statement of special educational needs. The Council offered to pay the value of the one hour a fortnight therapy he lost of £1,560 for his future education, £250 to Ms K for the benefit of her son in recognition of the impact of the loss, £200 to her for the distress caused, a written apology, and to take steps to ensure the failure is not repeated. This offer remedies the avoidable injustice caused.

**Details:** <http://www.lgo.org.uk/decisions/education/special-educational-needs/15-013-665>

---

Bristol City Council (15 014 965)

Statement Upheld

### **Safeguarding**

03-May-2016

**Summary:** The Council failed to adequately assess, plan, monitor and review Mrs E's care during her stay at the Care Centre. The Council's records are poor. On balance, I conclude that Mrs E did not receive the care she was entitled to expect. I recommend the Council apologise to Mrs E's son, Mr E. This was done.

<http://www.lgo.org.uk/decisions/adult-care-services/safeguarding/15-014-965>

---

Bristol City Council (15 010 103)

Statement: Upheld

### **Special Educational Needs**

17-May-2016

**Summary:** The Council delayed slightly in dealing with the recommendations of an annual review of Y's Statement of Special Educational Needs in December 2013. The Council took appropriate action to ensure that the provision detailed in Y's statement was in place following an appeal to Special Educational Needs Tribunal.

<http://www.lgo.org.uk/decisions/education/special-educational-needs/15-010-103>

---

Bristol City Council (15 019 669)

Statement: Upheld

### **Refuse and Recycling**

08-Jun-2016

**Summary:** The Council was at fault for failing to collect waste from Mr X's property. Its explanation and apology are suitable remedies. The Council has apologised to Mr X in response to his complaint about the way a member of staff spoke to him.

<http://www.lgo.org.uk/decisions/environment-and-regulation/refuse-and-recycling/15-019-669>

---

Bristol City Council (15 010 706)

Statement: Upheld

### **Safeguarding**

21-Jun-2016

**Summary:** The Council is at fault as it delayed in determining Mr Y's application for direct payments. As a result Miss X has suffered some uncertainty as she cannot know if the outcome for Mr Y would have been different. The Council agreed to remedy this injustice. There is no evidence of fault in how the Council investigated Miss X's complaints about the standard of care to Mr Y.

<http://www.lgo.org.uk/decisions/adult-care-services/safeguarding/15-010-706>

---

Bristol City Council (15 020 350)

Statement: Upheld

### **Traffic Management**

11-Jul-2016

**Summary:** Mr X complains the Council failed to recognise his unique situation as a member of the armed forces in dealing with his parking permit application. The Council recognises the proof of address that members of the armed forces provide and considered Mr X's request for visitor permits in line with its policy. This is not fault. The Council is at fault for the delay in issuing Mr X's parking permit. The Council has already provided a suitable remedy.

<http://www.lgo.org.uk/decisions/transport-and-highways/traffic-management/15-020-350>

---

Bristol City Council (15 009 639)

Statement: Upheld

### **Noise Pollution**

26-Jul-2016

**Summary:** Mr B says the Council mishandled his reports about noise nuisance and delayed replying to his complaint. The Ombudsman has found evidence of fault, upheld the complaint and completed the investigation because the Council agrees to apologise and learn from its errors. This was done.

<http://www.lgo.org.uk/decisions/environment-and-regulation/noise/15-009-639>

---

Bristol City Council (15 019 668)

Statement: Upheld

**Other**

27-Jul-2016

**Summary:** The Council has resolved Mr B's complaint by agreeing to make a payment to him to cover rent arrears incurred by his former tenant and by apologising for its failure to respond to his complaint.

<http://www.lgo.org.uk/decisions/housing/other/15-019-668>

---

Bristol City Council (16 000 415)

Statement: Upheld

**Housing Allocations**

01-Aug-2016

**Summary:** The Ombudsman found fault on Ms B's complaint that the Council failed to include her sister on her application for housing. The Council to fail to include her sister. It delayed dealing with her application and complaints. The Council apologised to Ms B and agreed to pay her £200 for the time she was put pursuing her complaint. It confirmed Ms B would not have successfully bid for advertised properties from the date she was told her sister had to apply separately to the date of a policy change.

<http://www.lgo.org.uk/decisions/housing/allocations/16-000-415>

---

Bristol City Council (16 001 607)

Statement: Upheld

**Other**

10-Aug-2016

**Summary:** The Council failed to properly explain play area design choices when deciding on installing a play area. This lead to confusion but that did not affect the final decision on the design. An apology was given.

<http://www.lgo.org.uk/decisions/other-categories/other/16-001-607>

---

Bristol City Council (16 002 324)

Statement: Upheld

### **Private Housing**

25-Aug-2016

**Summary:** Ms A complains the Council's offer of £500 compensation for the problems she experienced in getting her external wall insulation installed is inadequate given the delay, poor service and stress caused to her. There was fault by the Council which caused Ms A injustice but as the Council's offer to reduce Ms A's bill by £500 is a fair and satisfactory way of resolving the complaint the Ombudsman will not pursue it any further.

<http://www.lgo.org.uk/decisions/housing/private-housing/16-002-324>

---

Bristol City Council (15 016 063)

Statement: Upheld

### **Council Tax**

30-Aug-2016

**Summary:** Ms A complains about the Council's confused handling of her council tax account which has led to her being charged enforcement costs. While Ms A's own delay in responding to Council queries has contributed to the confusion, there has been fault by the Council which it has now agreed to remedy by removing all enforcement costs charged to Ms A since June 2015.

<http://www.lgo.org.uk/decisions/benefits-and-tax/council-tax/15-016-063>

---

Bristol City Council (16 003 626)

Statement:

Upheld

### **Homelessness**

16-Sep-2016

**Summary:** When dealing with a homelessness application and offering temporary accommodation the Council acted without fault except for a lack of clarity over storage costs and it failed to consider a complaint without delay. An apology was given.

<http://www.lgo.org.uk/decisions/housing/homelessness/16-003-626>

Bristol City Council (16 000 833)

Statement Upheld

### **Council Tax**



26-Sep-2016

**Summary:** The Council failed to refund the correct amount to Mrs X when she won a council tax appeal. It failed to identify it had made an error despite Mrs X questioning the matter repeatedly after the appeal for some years. The Council agreed to make the appropriate refund and to pay Mrs X an extra £500 to recognise the time trouble and distress the matter caused.

<http://www.lgo.org.uk/decisions/benefits-and-tax/council-tax/16-000-833>

---

Bristol City Council (16 001 863)

Statement: Upheld

### **Council Tax**

19-Oct-2016

**Summary:** When managing a council tax account the Council acted without fault in passing the debt to enforcement agents. It acted with fault, however, in failing to bring back the debt from enforcement agents once they reported new information about a tenancy and arranging for payment.

<http://www.lgo.org.uk/decisions/benefits-and-tax/council-tax/16-001-863>

---

Bristol City Council (16 001 936)

Statement: Upheld

### **Child Protection**

11-Jan-2017

**Summary:** There was fault in the way the Council investigated allegations of historic abuse. There was no fault in the Council's decision not to interview the Guardian in its investigation of the complaint. The Council has agreed a remedy.

<http://www.lgo.org.uk/decisions/children-s-care-services/child-protection/16-001-936>

---

Bristol City Council (16 002 222)

Statement: Upheld

### **Traffic Management**

20-Jan-2017

**Summary:** There is no fault in how the Council has dealt with a parking scheme on the street where Miss X lives or its decision to refuse Miss X's request for further restrictions. There is fault in how it has handled Miss X's complaint.

<http://www.lgo.org.uk/decisions/transport-and-highways/traffic-management/16-002-222>

---

Bristol City Council (16 004 861)

Statement: Upheld

**Assessment and Care plan**

06-Feb-2017

**Summary:** There was fault by the Council in not taking action when the other local authority failed to reply substantively to requests for an assessment of Mr X's social care needs. The Council should pay Mr X £125 in recognition of the uncertainty that the fault caused and Mrs B £1,180.66 to remedy the loss of respite provision.

<http://www.lgo.org.uk/decisions/adult-care-services/assessment-and-care-plan/16-004-861>

---

Bristol City Council (16 009 358)

Statement: Upheld

**Refuse and Recycling**

09-Mar-2017

**Summary:** The Council did not provide a reasonable garden waste collection service and did not investigate why this happened or take action to stop it happening again. The complainant has not had a reasonable service for a year. The Council will apologise to the complainant, provide the service free for a year and pay her £150 for the trouble it has put her to. It will also make a proper plan to provide a reasonable service to the complainant in future.

<http://www.lgo.org.uk/decisions/environment-and-regulation/refuse-and-recycling/16-009-358>

---

Bristol City Council (16 010 886)

Statement: Upheld

**Licensing**

10-Mar-2017

**Summary:** When the Council introduced a discretionary property licensing scheme it did not have a bespoke appeal procedure until a month after the scheme went live. Therefore the complainant's

late application appeal had several routes open to it causing confusion. However, the Council has reviewed and upheld the appeal remedying the complaint.

<http://www.lgo.org.uk/decisions/environment-and-regulation/licensing/16-010-886>

---

Bristol City Council (16 008 734)

Statement: Upheld

**Council Tax**

21-Mar-2017

**Summary:** The Council is at fault for not fully explaining when it will transfer credits from one council tax account to another. The Council has now agreed to provide that explanation. In other respects, the Council has dealt properly with the council tax accounts for the property Mr X lives in.

<http://www.lgo.org.uk/decisions/benefits-and-tax/council-tax/16-008-734>

### Complaints and Enquiries Decided (by Outcome) 2016-17

Authority Name	Invalid or Incomplete	Advice Given	Referred Back for Local Resolution	Closed after Initial Enquiries	Not Upheld	Upheld	Uphold Rate (%)	Total	Complaints Remedied by LGO	Complaints Remedied by Authority
Bath and North East Somerset Council	4	0	17	13	14	9	39	57	6	0
Bristol City Council	6	13	56	43	17	22	56	157	17	3
Birmingham City Council	18	31	210	105	38	63	62	465	44	5
Gloucester City Council	1	0	3	7	1	1	50	13	0	0
Gloucestershire County Council	6	0	24	20	10	10	50	70	8	0
Leeds City Council	6	10	47	78	21	30	59	192	19	3
Liverpool City Council	9	1	70	52	18	24	57	174	19	2
Manchester City Council	6	1	56	47	10	5	33	125	4	0
Newcastle upon Tyne City Council	5	6	22	19	3	8	73	63	4	1
North Somerset Council	4	1	25	35	11	10	48	86	7	1
Nottingham City Council	5	2	40	28	15	8	35	98	7	0
Sheffield City Council	4	5	67	60	21	20	49	177	15	3
Somerset County Council	5	2	30	14	3	11	79	65	10	0
South Gloucestershire Council	1	1	21	10	3	3	50	39	1	1
Totals	80	73	688	531	185	224	740	1781	161	19



# Full Council

14 November 2017

**Report of:** Internal Audit

**Title:** Valuation Process Review – Sale of Port Freehold  
(For Information – report referred to Full Council for information by the Audit Committee)

**Ward:** n/a

**Member Presenting Report:** Cllr Jos Clark – Chair of Audit Committee

## Recommendation

To note the findings of the Internal Audit report “Valuation Process Review – Sale of Port Freehold.”

## Summary

A summary of the review , as reported to the Audit Committee in September 2017, is provided for information for members.

## The significant issues in the report are:

1. Both valuations undertaken were in line with the Royal Institute of Chartered Surveyors (RICS) Red Book Guidance.
2. Both valuations undertaken took account of the elements that would be expected in the case of a ‘special purchase’ as in the additional worth to the Tenant should they own the freehold, and, as such, the valuations were considered appropriate.
3. As the valuations took into consideration the ‘special purchaser’ status of the Tenant and the offer of £10m was 38% higher than the top valuation, Ministerial Approval was not required or sought.



## **Policy**

1. N/A

## **Consultation**

2. **Internal**  
SLT including S151 Officer, Cabinet Member for Governance, Resources and Finance.
3. **External**  
N/A

## **Context**

4. A concerned member of the electorate requested an independent review of the decision making process in respect of the sale of the freehold of the Port of Bristol.
5. In summary, the concerns raised were that the valuation process was not robust leading to the decision making process being flawed and that collectively the sale was illegal.
6. A summary of the findings is attached in Appendix A.

## **Proposal**

7. The report is provided for information.

## **Other Options Considered**

8. None

## **Risk Assessment**

9. The work of Internal Audit minimises the risk of failures in the Council's internal control, risk management and governance arrangements, reduces fraud and other losses and increases the potential for prevention and detection of such issues. Areas of significant risk are detailed in the report.

## **Public Sector Equality Duties**

- 10a) Before making a decision, section 149 Equality Act 2010 requires that each decision-maker considers the need to promote equality for persons with the following "protected characteristics": age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation. Each decision-maker must, therefore, have due regard to the need to:
  - i) Eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Equality Act 2010.

- ii) Advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to --
  - remove or minimise disadvantage suffered by persons who share a relevant protected characteristic;
  - take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of people who do not share it (in relation to disabled people, this includes, in particular, steps to take account of disabled persons' disabilities);
  - encourage persons who share a protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- iii) Foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to –
  - tackle prejudice; and
  - promote understanding.

10b) No Equality Impact anticipated from this report.

#### **Legal and Resource Implications**

**Legal**

**N/A**

**Financial**

**(a) Revenue**

**N/A**

**(b) Capital**

**N/A**

**Land**

**N/A**

**Personnel**

**N/A**

#### **Appendices:**

Appendix A – Summary of “Valuation Process Review – Sale of Port Freehold.”

#### **LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

##### **Background Papers:**

**Cabinet** - 03/03/15 (Item 6)

**Extraordinary Full Council** - 02/06/15 (item 4)

**Cabinet** - 16/06/15 (item 3)

## Appendix A

### Summary of Valuation Process Review – Sale of Port Freehold

#### Background

The Tenant had held the leasehold on the land situated at the Port of Bristol (POB) since 1991, prior to which the POB was fully owned and operated by Bristol City Council (BCC). The leases that were sold to the Tenant were for 150 years at a peppercorn rent, and as such the income to the Council was not material.

Since the leasehold purchase, the Tenant had periodically expressed an interest in purchasing the freehold for the land on which the port is situated, in order to expand its business and open the POB up to larger ships/containers. Additionally, in the report to Cabinet in 2014, the stated benefits of a sale also included that the further expansion of the POB would bring additional prosperity to the Bristol region as a whole and not just to the Tenant and the POB.

In March 2012, the Tenant put forward an offer of £3.85m for the freehold, which was subsequently declined. Prior to the rejection, however, a valuation was commissioned by the Council's Property Division, with the 'Terms of Engagement' and subsequent Valuation report having been sent to the (then) Service Director of Finance/S151 Officer.

The valuation was provided based on both the 'Market Value' and the 'Worth' of the asset to a particular tenant, including considering the value the tenant may realise in the future should they gain the freehold.

Following the above offer from the Tenant not being accepted, a further offer was made in March 2014, after discussions between the Tenant and BCC which commenced in December 2013. The revised offer was for £10m.

As the previous valuation was commissioned two years previously, it was considered prudent to commission a further external valuation, initially from the valuer who provided the original valuation, but due to delays and the proposed level of liability, the Service Director: Property determined not to proceed, but to engage another valuer instead. The terms of the engagement required the valuer to value the POB on a 'Market Value' basis; however their final evaluation was based on the 'Marriage Value'. The cost of the valuation was £15,000.

#### Scope

A concerned member of the electorate requested an independent review of the decision making process in respect of the sale of the freehold of the Port of Bristol.

In summary, the concerns raised were that the valuation process was not robust leading to the decision making process being flawed and that collectively the sale was illegal.

#### Summary of Findings and Conclusions

##### Valuation Procurement Exercise for 2<sup>nd</sup> Valuation:

Procurement Regulations require that when the estimated cost of a contract is £15,000 or less one written quotation should be obtained before proceeding, this process was not followed in the case of the engagement of the 2<sup>nd</sup> Valuation, due to time constraints.



## **Valuation Methodology and Determination of Best Consideration**

Both of the valuations were undertaken in line with the Royal Institute of Chartered Surveyors (RICS) -Red Book guidance, with both taking consideration of the benefits to the leaseholder should they obtain the freehold. It was the view of the Service Director: Property that this demonstrated that the valuers had taken account of the 'special purchaser' status of the Tenant. It is Internal Audit's view that the valuations took account of the elements that would be expected in the case of a 'special purchaser', as in the additional worth to the Tenant should they own the freehold, as such the valuations were considered appropriate.

Internal Audit was informed by the Service Director: Property that in the majority of asset sales, a 'Heads of Terms' is raised as part of the process, and while this document is not enforceable, it does provide a written record of what was agreed. A 'Heads of Terms' was not, however, raised for the sale of the POB, and as such there was no clear audit trail of the negotiation discussions and what was agreed.

## **Adherence to Legislative Requirements**

As the valuations commissioned for the POB had, in the view of the Service Director: Property, taken into consideration the 'special purchaser' status of the Tenant, and the offer of £10m was 38% higher than the top valuation, Ministerial Approval was not required or sought.

## **Good Practice Identified**

To ensure that the Council can demonstrate good governance in the sale of assets in the future and mitigate risks of reputational damage, the following good practice points were identified to be applied to any high value sale of Council Assets:

- Any offer received or solicited for Council assets should be formally recorded by way of a 'Heads of Terms', otherwise the Council is at risk of losing transparency in the sale transaction, as well as coming under scrutiny should the sale price be in dispute.
- Negotiations for significant financial transactions should be confirmed in writing, copying the correspondence to a second party in order to protect any one individual in terms of challenge, and to provide for backup in the event that the leading officer is not available.
- Formal records of negotiations should be maintained so there is a clear 'audit trail' of what has been discussed and agreed, who agreed it and when it was agreed. Documenting this process will allow the Council to demonstrate that best practice has been applied and that "best consideration' has been achieved. It will also aid the Council in the event of a challenge.
- Procurement regulations should always be followed, however where procurement regulations are not followed due to business need then the process followed and the reason for this should be documented and a waiver sought. Otherwise, the Council cannot demonstrate that it has achieved best value in the transaction.

The Good Practice identified will be followed up by Internal Audit in conjunction with the follow up to the Disposal of Assets review conducted in 2016/17.