THE BRISTOL LOCAL PLAN
SUSTAINABILITY APPRAISAL

Contents

Foreword

What is this report?

This report is an independent assessment of how environmental and socio-economic considerations are dealt with in the current Bristol Local Plan (Adopted 1997). It provides a critical commentary on the Plan setting out where it works well and where it could be improved.

Why has it been produced?

The Bristol Local Plan needs to be updated and this report was commissioned by the Strategic and Citywide Policy Team as part of this process. Its purpose is to inform debate on what changes may need to be made in preparing an updated Plan. The report was written by independent consultants, David Tyldesley and Associates. We have not changed or edited this report.

What should I do with it?

This report has been published in preparation for a programme of public consultation on possible changes to the Bristol Local Plan. What future we want for Bristol, and how we make it happen, is for the city - for you - to decide. We hope you will want to get involved in this debate.

1. Introduction to sustainability appraisal

1.1 Sustainability Appraisal is a process used to assess the environmental and socio-economic effects of plans or programmes. The origins of Appraisal derive from the development of Environmental Impact Assessment for specific projects, from the early 1970's onwards. From these it became increasingly apparent that the effects of whole programmes or plans need to be assessed, as well as individual projects. Consequently, from the early 1990's there has been an increasing use of Strategic Environmental Appraisals, especially in the UK and in relation to development plans. With impetus from the Governments revised approach to Sustainable Development [1], Strategic Environmental Appraisal has gradually widened its scope from just environmental issues to take on economic and social issues in a wider Sustainability Appraisal, reflecting the four key principles in the 1999 UK sustainable development strategy.

1.2 The basic purpose of a Sustainability Appraisal is to ensure that environmental and socio-economic considerations are dealt with comprehensively and consistently (but not necessarily in great detail) throughout the preparation of any plan or programme.

1.3 By highlighting the most significant effects of policies and proposals, at this strategic level, the Appraisal can help to:

a   avoid unnecessary environmental and socio-economic harm;

b   reduce the effects of environmental and socio-economic harm where it cannot be avoided (mitigation);

c   compensate for residual environmental and socio-economic effects that cannot be further reduced; and

d   identify positive environmental and socio-economic benefits that could be provided.

1.4 Rather than examining the detailed effects of every policy and proposal in a plan, the object of the appraisal is to see whether the plan is moving towards sustainable development or away from it.

1.5 Considering the environmental and socio-economic effects of plan policies and proposals has been part of the planning process for a very long time. It is not a new idea or a new practice. What is new and different about these Appraisals is that they provide a more rigorous and thorough review, following a procedure that is characterised by being open, comprehensive, organised, systematic and impartial, so reducing the likelihood of important effects being overlooked and providing a credible and transparent assessment of the effects of the plan. Appraisal enables a plans environmental and socio-economic implications to be more clearly understood and allows any negative effects to be highlighted and re-examined. It is an iterative process, often identifying potential adverse effects and setting in motion (or influencing in parallel) the review or adaptation of the plan to see whether these effects could be avoided or reduced.

2. Key elements and stages of a sustainability appraisal

2.1 An outline of the appraisal process adopted for this plan is shown in Figure 1. It should be emphasised that within the overall framework of good practice guidance there is significant flexibility to develop locally relevant adaptations to the method and, particularly, to develop aims, objectives and criteria that match the needs of the local plan. Existing guidance [2] is related mainly to SEA and following it too closely can lead to confusion. Apart from the lack of socio-economic aims and criteria, there is often no distinction between sustainability aims and resources.
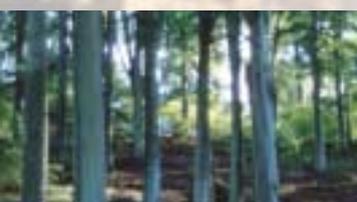
2.2   Appraisal is an iterative process, adapting to the needs of the plan making process and to the findings of earlier stages. Some steps need to be repeated when changes are made to the plan. The appraisal in this report is only the first step in an ongoing process which will last throughout the alteration of the plan.

FIGURE 1: THE APPRAISAL PROCESS

> ### Step 1 - Defining the Purpose and Scope of the Sustainability Appraisal
>
> *Setting out clearly what the appraisal is intended to achieve and its scope and when and how it will influence the plan making process*

> ### Step 2 - Sustainability Aims
>
> *Defining the environmental, socio-economic aims of sustainable development*

> ### Step 3 - Setting Sustainability Criteria
>
> *Defining the environmental and socio-economic goals that the development plan might be expected to achieve, and then setting specific criteria that will used to test the plan.*

> ### Step 4 - Checking the Strategy
>
> *Are the aims of the plans overall strategy compatible with the pursuit of sustainability?*

> ### Step 5 - Scoping the Policy Issues
>
> *Do the policies cover the full range of relevant issues? Where are the gaps, how may they be filled?*

> ### Step 6 - Appraising the effects of Policies
>
> *What are the environmental and socio-economic effects of each policy, when measured against the sustainability criteria, at an appropriate level of detail to test the plan?*

> ### Step 7 - Appraising the overall effects of Proposals
>
> *What will be the main effects of the plans locational strategy, principles or programme of proposals, when measured against the sustainability criteria, at an appropriate level of detail to test the plan?*

> ### Step 8 - Suggesting requirements for monitoring
>
> *How to keep track of the plans performance and changes that it may influence. Suggesting issues where monitoring may be focused, for example on areas of uncertainty or potential policy divergence.*

3. The Bristol Local Plan 1997

3.1 The current Bristol Local Plan was formally adopted by the Council in December 1997 [3]. It was the first city-wide plan for twenty years. It had started with a public consultation process in 1992 and was intended to cover the period to the year 2001. Thus, some parts of the plan were first drafted almost nine years ago. This may sound as though the plan must be a long way out of date, bearing in mind the changes in planning and government policy since then. However, this is not the case for two reasons.

3.2 Firstly, the plan changed many times as it went through the process of public scrutiny leading to adoption. At each stage it was adapted to better reflect the emerging issues and government policy. Secondly, the Bristol local plan has been widely acknowledged as one of the best local plans in terms of the way it tackled and addressed sustainable development issues. It was undoubtedly, a very innovative plan which contained a wider range of sustainable development policies, particularly those relating to the environment, than all but a handful of other local plans in the mid-1990's. It still holds its own with good practice standards and probably requires less adaptation to update it than many other plans of its age. However, the plan must be rolled forward, to conform with the new Structure Plan and to stay ahead of planning issues. If it is to effectively lead planning decisions in the city over the next few years, it must be altered to embrace new government policies, emerging planning and transportation issues and to remain a model of good practice which the City can be proud of.

4. Step 1 Defining the purpose and scope of the sustainability appraisal

4.1 One of several early steps in the process of review and alteration is to see how the existing plan performs in a sustainability appraisal applied at the best of today's standards. In some ways this is a rather unfair test because it criticises a plan for shortcomings, some of which may not have been recognisable at the time it was written and adopted. However, this test does help to identify gaps and weaknesses in the plan that can be filled or remedied in the alteration. It also helps to make sure that when the plan is placed on deposit it will be possible to demonstrate how the plan has changed and why. It will show that the plan has responded to the findings of the sustainability appraisal process to make it a better plan. It is the first of several appraisals that the plan will be subjected to as it progresses through the review and alteration processes.

4.2 The purpose of the appraisal, therefore, is to help to inform the review and alteration process, to see what may need to be done to ensure that the altered plan performs well in a sustainability appraisal when its policies and proposals are more fully developed.

4.3 The scope of the Appraisal is the full range of sustainability issues, derived from all four of the government's key principles for sustainable development, not just environmental issues. The purpose and scope, therefore are entirely in accord with the expectations of national planning guidance in PPG 12, Development Plans (1999) [4].

5. Step 2 Setting sustainability aims

5.1 This step defines the environmental, social and economic aims of sustainable development in a way that can be used in a development plan appraisal. This is a key starting point to the process which has been discussed with the Council and used to draw up appraisal criteria. The aims are based on a detailed analysis of the historical context and the principles involved in sustainable development which allows us to draw together a number of key aims that should be reflected in the plan, if it is to be based on all of the key principles of sustainable development. The aims are general and at this stage they are not adapted to ensure they are relevant to the Bristol Local Plan.

5.2 The aims that emerged from this process are set out below. Examples of the kinds of resources that the aims are intended to protect, sustain or enhance are also listed; together with some of the planning topics relevant to the aims. The list of examples is not intended to be exhaustive.

6. Step 3 Setting sustainability criteria

6.1 In order to apply rigorous and consistent tests for the plan's strategy, policies and proposals, a set of criteria are drawn up which cover the whole range of the sustainability aims. Several aims may be relevant to one criterion and several criteria may be relevant to one aim. At this stage the criteria are adapted to suit the purpose of the Appraisal and the locality. It is not possible to undertake an appraisal which tests every conceivable aspect of every aim. The criteria also have to be realistic in terms of what a development plan can actually achieve. There is no point testing a plan with criteria that a plan cannot influence because it is dominated by market forces or other regulatory controls. This would be hugely demanding of

Sustainability Aims

Aim 1
Improving social and economic equity and opportunity for everyone and reducing social exclusion.

Resources:
Housing, residential areas, community facilities, jobs.

Planning Topics:
Housing, community, employment.

Aim 2
Providing a clean, healthy, safe and visually attractive environment for everyone.

Resources:
Urban and rural environments, service infrastructure, hospitals and other health facilities, defence establishments.

Planning Topics:
Amenity, design, lighting, crime, noise, contaminated land, flooding, unstable land, transport, housing, services, health and defence.

Aim 3
Improving accessibility of homes, jobs, services, facilities and the environment for everyone.

Resources:
Shops, town and neighbourhood centres, schools, health facilities, public transport, paths, bridleways, cycleways, greenways, sports facilities, allotments, public open space, tourist facilities and accommodation.

Planning Topics:
Shopping, transport, urban design, sport, recreation, tourism, open space, access.

Aim 4
Reversing decline and maintaining high and stable levels of sustainable economic growth.

Resources:
Industrial and commercial sites and infrastructure, transport infrastructure including ports, railways, roads, airfields and their interchanges, telecommunications, warehouse, storage and distribution facilities, research and development facilities.

Planning topics:
Employment, industry, commerce, retail, transport, telecommunications.

Aim 5

Reducing unemployment and maintaining high and stable levels of employment.

Resources:
Employment sites and opportunities, schools, colleges, universities, public transport.

Planning Topics:
Employment, education, transport, mixed uses

Aim 6

Environmental protection including minimisation of pollution and waste.

Resources:
Air, water, sea, land, soil.

Planning Topics:
Energy consumption, travel, green transport plans, pollution, waste, contaminated land.

Aim 7

Respecting urban morphology, settlement pattern, land form and natural systems and processes, containing the effects of change within environmental capacity and adopting the precautionary principle.

Resources:
Geology, geomorphology, natural systems and processes, urban fabric and infrastructure.

Planning Topics:
Natural environmental systems and management including river catchment management, coastal planning, flooding, landscape, countryside, urban form structure and functions, green belt, green wedges and corridors, unstable land.

Aim 8
Conserving and enhancing, and where necessary restoring, the quality, quantity, character, distribution, distinctiveness and diversity of environmental, historical and cultural assets and stock.

Resources:
Landscape, open space, wildlife species and habitats, townscape and built environment, cultural, historical and archaeological sites and features.

Planning Topics:
Landscape and nature conservation, open space, built heritage, conservation of historic environment, archaeology, cultural identity and associations.

Aim 9

Managing the use and consumption of renewable resources within the limits of replenishment.

Resources:
Air, water, sea, soil and vegetation.

Planning Topics:
Renewable energy, forestry and woodland, agriculture.

Aim 10

Minimising the consumption of non-renewable resources, using renewable substitutes where possible and in all other ways using and consuming non-renewable resources wisely and efficiently.

Resources:
Construction minerals, energy minerals, countryside, open land, soil, biodiversity, historical and cultural assets.

Planning Topics:
Energy efficiency, transport, nature conservation, historic environment, urban renewal, regeneration, reuse of land and buildings, minerals.

resources, unwieldy and incomprehensible, may actually disguise problems rather than highlight them and is unnecessary. The consultants' experience in environmental and sustainability appraisal in England, Scotland, Wales and Ireland indicates that a carefully selected list of some 8 - 12 criteria ensure that the key elements likely to be influential in deciding whether the plan is moving towards or away from sustainable development are considered in the appraisal and shortcomings are revealed. It is actually counter-productive to include detailed, marginal, unpredictable, irrelevant or insignificant factors.

6.2 The criteria selected to test the Bristol Local Plan are specifically biased towards urban planning issues, to things that an urban local plan can and should be addressing and which are likely to be particularly testing in the Bristol circumstances.

6.3 The criteria are as follows:

Will the policy or proposal be likely significantly to:

1. Improve the quantity, range and quality of the housing stock or community facilities?

2. Enhance the appearance of urban and rural environments or make them cleaner, healthier or safer?

3. Improve accessibility of town and neighbourhood centres, schools, health facilities or sport and recreational facilities by walking, cycling or public transport?

4. Encourage sustainable economic growth by enhancing regional and local industrial, commercial, retail, warehousing, distribution and freight transport infrastructure and facilities?

5. Provide more and a wider range of accessible employment opportunities via mixed use developments, employment land allocations or better education and training opportunities?

6. Reduce waste and / or the risk of pollution of air, water, sea, land or soil?

7. Reduce the need to travel and / or journey lengths?

8. Fit well with Bristol's urban form and not increase the risk of flooding or land instability affecting development?

9. Conserve, enhance or restore the quality, quantity, character, distribution, distinctiveness and diversity of environmental, historical or cultural assets / resources?

10. Encourage appropriate forms of renewable energy, or to encourage the use or consumption of either renewable or non-renewable resources in a more sustainable way?

7. Step 4 Checking the strategy

7.1 The object of this step is to test whether the aims of the plans overall strategy are compatible with the pursuit of sustainability? If they are not, it makes it much less likely that the plan will be moving generally in the direction of sustainable development.

7.2 The strategy of the Plan is set out clearly in paragraph 1.4.8, it is referred to as the "key policy objectives". The Plan's strategy is summarised in Figure 2 below and compared with the sustainability aims and criteria.

7.3 Generally, it will be seen from Figure 2 that the Plan's strategy remains broadly compatible with the aims of sustainability and the appraisal criteria. Each key objective is relevant to at least one aim and one criterion. Each aim and each criterion has at least one key objective. They cover social, economic and environmental issues succinctly and quite comprehensively. The weakest links are in respect of the lack of explicit reference to the following components of the aims and criteria, though it is accepted that some are implicit or were intended:

Appraisal of the Plan's overall objectives / strategy

Key objective	Sustainability Aims	Criteria
Vitality / viability of Bristol	1, 4, 5, 8	1, 4, 5, 9
Economic development and regeneration	4, 5	4, 5, 7
Access to jobs	1, 3, 5	3, 5, 7
Benefitting from new national infrastructure	4	4, 5
Reduce congestion, improve road safety	2, 6, 10	2, 6, 7 & 10
Manage environment and quality of life	1, 2, 6, 7, 8	2, 6, 8 & 9
Protect green space, amenity / wildlife	2, 3, 8	2, 3, 9 & 10
Protect and promote shopping centres	3, 10	3 & 4
Promote leisure, sport, art and tourism	3,	1 & 3
Meet housing needs / SP target	1, 3	1

- social exclusion, equal opportunity and access for all;

- clean and healthy environments safer from crime as well as road accidents;

- access to the countryside and the role of the Community Forest;

- better integration of land use planning and transport issues;

- minimisation of pollution, reducing and managing waste;

- urban form, settlement pattern, the effects of natural systems such as coastal processes and flooding;

- the capacity of the environment, limits of acceptable change and the precautionary principle;

- archaeological and cultural resources and assets;

- renewable and non-renewable resources.

7.4 We do not think that the ten objectives should be abandoned. Rather, with relatively small changes, they can be adapted to:

a be more explicit in respect of things they were probably always intended to cover (eg archaeology, access to the countryside, natural systems etc);

b embrace the newer ideas and priorities of social exclusion, equity, environmental capacity and the precautionary principle; and

c enhance the role of the local plan in integrating land use planning and transport issues.

In our view the key policy objectives will then continue to provide a good working strategic framework for the Plan's alteration.

7.5 The importance of these key objectives to the whole plan, and to the process of alteration, is such that we think they should be highlighted and presented in a prominent way, rather than immersed in the early explanatory text of the plan.

8. Step 5 Scoping the policy issues

8.1 This step seeks to check whether the policies cover the full range of relevant issues and, if there are gaps, how they may be filled. The technique is based on a detailed analysis of all national planning guidance, in England, Scotland and Wales, together with an analysis of the content of hundreds of development plans throughout Britain to identify the fullest possible and latest range of planning policy issues that may be tackled by a local plan.

8.2 It is highly unlikely that any one plan will ever include all of the policy issues in the scoping list for various reasons. Firstly, individual planning authorities are unlikely to have the resources to undertake the compilation of the list.

Secondly, some issues are bound to be less relevant to some areas and some plans do not have the remit to include some policy topics. For example, we have not identified gaps relating to waste and minerals planning as the 1997 Plan was prohibited by law from including them.

8.3 The checklist includes over 400 policy issues and aspects of policy (excluding minerals and waste) so it is not reproduced here. The paragraphs below indicate the gaps identified in the scoping process. Self-evidently some of these gaps are more significant than others. There is a limit to the extent of change that the alteration of the plan can achieve. Thus, after looking at the general policy approach and framework in paragraphs 8.4 to 8.9 below, we have drawn up two lists of policy gaps. The first is those which we consider to be the more important issues to address in the alteration. The second list is of policy issues that are less important in the context of the alteration of the plan and / or some of which are more marginal to the land use planning process and therefore to inclusion in the plan.

General policy approach and framework

8.4 Generally, the plan is very strong on protecting employment and residential land / buildings in various categories. However, the aims of sustainable development can sometimes be better achieved with a more flexible approach, allowing, in defined circumstances, more changes of use between industry and other employment uses and between them and residential uses to sustain an overall stock, provide greater incentive for urban regeneration, reduce travel and increase mixed use developments where appropriate.

8.5 Overall, the Plan has a strong foundation of protectionist and permissive policy approaches, but this leads to a rather defensive style of policy writing. This is an important element of a Local Plan, but to achieve the wider objectives of positive planning and sustainable development, and the Plan's key objectives, polices could be more promotional and encouraging so creating incentive and attracting innovation. Rather than always approaching policy subjects with a statement of what will be protected and the criteria (often hurdles) that development must overcome, there is more scope for the use of words such as choice, innovation, enterprise and vision, stimulating employment and encouraging investment, at least in the explanatory text. Examples include policies relating to small businesses, town and neighbourhood centres, greenways, contaminated land, renewable energy, outdoor advertising, archaeology and the reuse of buildings etc.

8.6 Whilst the Plan's objectives include economic growth and reinforcing vitality and viability there is no policy explicitly providing choice and competition and encouraging new enterprise or innovation.

8.7 There is scope for increasing the policy framework and references to equal opportunities, including addressing deficiencies in provision for certain groups in society and to access for all.

8.8 There could be a clearer structure to the shopping and city centre policies reflecting the sequential approach to locating new development proposals.

8.9 Overall there needs to be a much stronger cross referencing between policies in the Plan and the now impressive suite of PANs published by the Council, which appear to us to be formal Supplementary Planning Guidance (SPG).

Additional policy topics for priority consideration

8.10 The plan could include new or extended policies to cover the following issues.

1. Explicit reference to and integration with the strategies in the Local Transport Plan.

2. Developing port, harbour and wharf facilities and transport interchange with other modes.

3. How and when the Council will require the provision of green travel plans for new developments and where the council will use conditions and planning obligations to deliver more sustainable transport solutions.

4. Providing a more flexible framework for car parking standards, including setting maximum levels of parking for some housing and employment / business development.

5. The promotion of transport choice and public transport use, potentially reducing the levels of parking in areas where good accessibility is achieved.

6. Promoting and allocating land for parking that is shared by different users to achieve the most efficient use of the space.

7. Requiring stronger links between housing development and the provision / improvement of public transport.

8. Setting out when it may be advisable to release employment land for housing, where this would better fit the plan's objectives and sustainability aims and any relevant development control criteria / SPG.

9. Promoting mixed use developments in appropriate locations throughout the city.

10. The density of new housing development, particularly:

   a requiring higher densities in and around existing centres and on public transport nodes and corridors;

   b setting minimum densities for all development; and

   c setting density ranges for all residential areas, respecting their character but providing for appropriate infill and redevelopment.

11. Identifying house types currently under-provided and encouraging new build or conversion to remedy the imbalance and to encourage urban villages and stronger, more balanced urban communities.

12. Biodiversity conservation specifically related to:

   a integrating policies in the local Nature Conservation Strategy;

   b contributing to the achievement of targets in the local Biodiversity Action Plan;

   c explicit reference to encouraging the management of features of the landscape of major importance for wild flora and fauna (statutory requirement of Regulation 37 of the Habitats Regulations 1994).

13. Areas of deficiency in public open space and how development may help to remedy them.

14. Identifying specific public open space (if any) that may be suitable for development and related criteria.

15. The requirement of the community for more sports pitches, playing fields and recreational open space.

16. The Community Forest, including how development may contribute to its achievement and that the Forest designation does not relax the green belt policies.

17. A statement that any permission for permanent development in the green belt would only be granted following a green belt review in a plan review or alteration.

Other policy topics that may be considered

8.11 In this or a subsequent change to the plan, consideration could be given to include new or extended policies to cover the following topics, where they are considered appropriate to land use planning matters.

1. Securing the release of privately owned "brownfield" land suitable for re-use / redevelopment.

2. Encouraging and managing the evening economy in the city centre.

3. Promoting cycle parking and storage facilities.

4. Relating to the encouragement of appropriate home-working in residential properties where this may require a planning permission.

5. Providing more incentive for housing in the city centre, but not at the expense of commercial floorspace.

6. Energy efficiency, to the extent that the plan may influence this, within the scope of government guidance.

7. Considering the potential for renewable energy projects appropriate to the area, such as those relating to solar energy, landfill gases or biomass (eg coppiced woodland) production.

8. Adopting the landscape character approach to landscape policies seeking to sustain the distinctiveness of all local landscape character types in new development.

9. Environmental Impact Assessment and non statutory environmental, traffic and capacity appraisals.

10. Identification of locations of potentially unstable land on the Proposals Map or at least diagrammatically in the explanatory text.

11. Percent for art and art in public spaces, to the extent that the plan may influence these, within the scope of government guidance.

12. An explicit commitment to stewardship of the historic environment and positive promotion of the re-use of historic buildings.

13. Setting criteria for the review of Conservation Area boundaries, identifying any further possible Conservation Areas and relating to the control of advertisements in Conservation Areas.

14. Protecting and enhancing views into and out of Conservation Areas and of Historic Parks and Gardens.

15. Protecting wider historic townscapes and locally important buildings or groups of buildings.

16. The need for, protection, rationalisation and promotion of allotments.

17. Public rights of way.

18. The potential of urban fringe sites for recreational use.

19. Indoor sports facilities including swimming pools, courts, gymnasia etc

20. A suitable location for noisy sports where conflict may be minimised.

21. Enhancement of despoiled stretches of coast line and imaginative reuse of disused or redundant coastal land (if any).

22. Identifying noise sensitive developments and quiet recreational areas and how planning conditions and obligations may be used where noisy and noise sensitive developments may be difficult to separate.

23. Protecting the best and most versatile agricultural land, though it is accepted there may be none in the City's area and the small amount of agricultural land is green belt.

24. Extending the policy base for telecommunications including where the planning authority may intervene in the control of permitted development; how the issue of potential interference will be considered.

25. Adaptation of flood risk and unstable land policies (ME9 and ME13) to start with the policy priority of preventing development in such areas, avoiding risk or unsustainable works before going on to require remedial or mitigation works where development is allowed.

26. Tourism accommodation, protection of tourism assets, leisure / recreational facilities for tourists that may also benefit residents, and integration with historic environment and traffic management. The tourism policy is weak and narrow in scope and does not reflect the explanatory text that precedes it.

8.12 It will be seen from the list that many of the gaps relate to matters which have tended to come to the fore since the last opportunity to introduce new topics into the Bristol Local Plan. In any scoping exercise in 1996 / 97, for example, in our view the Plan would have performed well.

9. Step 6 Appraising the effects of policies

9.1 This step seeks to assess the environmental, and socio-economic effects of each policy, measured against the sustainability criteria, at an appropriate level of detail to test the plan in light of the sustainability aims. There are over 140 policies in the Local Plan. The full appraisal matrix is reproduced in the Policy Appraisal Matrix at the back of this document. The following paragraphs provide an overview of each chapter of the Plan in terms of the policy context. This needs to be read in conjunction with the scoping gaps in section 8 above to give the full picture of the outcome of the policy appraisal.

Management of the Environment

9.2 As would be expected, this chapter performs very well against Aims 2, 6 and 8 and Criteria 2 and 6 and to a lesser extent Criterion 9. It has largely neutral or slightly beneficial effects for criteria 1, 3, 5 and 7. This was an innovative lead chapter for the Local Plan when drafted and has stood the test of time quite well in that it still broadly reflects government policy and good practice. However, this ought to be the chapter that performs really well against Aim 7 and Criterion 8, and yet there is significant potential for conflict and some areas of uncertainty.

9.3 There are some areas of policy divergence particularly in relation to the deterrent effect of policy ME3 on industries that rely on inherently hazardous substances and the development of Avonmouth in light of sustainable development objectives for coastal areas. Policies ME9 and ME13 ought perhaps to adopt a more precautionary approach and firstly avoid areas of potential flood risk or land instability before requiring measures to be provided that may be unsustainable.

9.4 This would seem to be the chapter in which the concepts of environmental carrying capacity and the precautionary principle would readily find a home.

9.5 Minor changes in wording are recommended for policies ME1, ME2, ME3, and ME7, see Appendix A. ME14 appears to be directed at telecommunications development and may as well be specific.

Natural Environment

9.6 The policies in this chapter, not surprisingly, are highly compatible with sustainability aims. They perform very well against criteria 8, 9 and 10 which would be expected; but also notably against social criteria 2 and 3. Some contribute to reducing pollution and travel. Policy NE11 has important inter-relationship with policies in chapters 2 and 4 and it remains one of the best examples of its kind in UK development plans. Policies NE1 and NE2 will be critical to retain as urban open space comes under increasing pressure.

9.7 There are, inevitably, tensions and uncertainties associated with the retention of the Inner Green Belt boundary. Whilst important for criteria 8, 9 and 10 the Green Belt can have the effect of increasing densities and pressures on open space in the city, reducing accessibility and increasing travel. It may make economic and employment growth more difficult to achieve in the City but, of course, it has many socio-economic and environmental benefits including those of sustaining urban form, access to the countryside, urban fringe management and urban regeneration.

9.8 Minor amendments to Policy NE5, the addition of a policy to more fully comply with the requirements of Regulation 37 of the Habitats Regulations 1994, and the incorporation of wider references to and adoption of the landscape character approach are recommended.

Built Environment

9.9 This chapter has a particularly detailed suite of policies relating to the design of and changes to the built environment, especially Conservation Areas and Listed Buildings. This no doubt reflects the national, indeed international significance of Bristol's built heritage. The policies are unlikely to have significant deterrent effects on economy or employment and perform well against social and environmental criteria.

9.10 We believe there is scope to rationalise and reduce the length and number of policies in this chapter. A policy relating to the suite of PANs, as formal SPG could be introduced, and some detail shifted to the SPGs which can then continue to develop the detail that is undoubtedly needed in a policy framework, but not necessarily in the Local Plan. We believe that the chapter may need to be expanded to accommodate some of the issues raised in the scoping in section 8 above. This would make the chapter very long. However, it could be split into "Design and the Built

Environment" and "The Historic Environment", moving policy NE9 to the Historic Environment chapter.

Movement

9.11 This chapter is likely to see significant changes owing to the increased profile of integrated transport issues into local plans and their relationship with Local Transport Plans. Some policies could be deleted if a scheme has now been completed or abandoned. Other policies could be transferred to SPG, eg. the detailed policies on parking and other forms of provision.

9.12 This will be advantageous because several new policies will need to be introduced to cover the gaps identified in the scoping stage. Site or line-specific proposals are not appraised here as some may be completed, some now perhaps abandoned and all are likely to be reviewed. Generally this chapter needs to be closely examined for its compatibility with the new expectations of government policy and whether any changes to the plan's overall strategy may be needed. This is important because, if the scale of change is large, an alteration may not be appropriate and fuller Local Plan Review may be needed.

9.13 The Schedule to Policies M1, M14 and M15 should transfer well to SPG.

Economy

9.14 The objectives of this Chapter are highly compatible with sustainability aims but to some extent the narrower cover of issues in the policies that follow demonstrate how difficult it can be for planning policies to fully reflect all aspects of sustainable development. On the whole the policies represent a reasonable balance between potentially conflicting sustainability aims.

9.15 Policies EC8, EC9 and EC10 could have deterrent effects in some economic and employment sectors. It may be better to positively plan for locations to accommodate open site users and to be more specific about uses or sites

where the conflict resolution attempted in Policy EC8 may be needed.

9.16 It may also be necessary to introduce greater flexibility into the policies seeking to fossilise industrial etc sites. The reality may be that industry will never fill these sites again on a like-for-like use class basis so protection for any employment use would be more realistic. To force service employment out to greenfield sites or away from the city and have derelict, vacant or under used factories would defeat the sustainability aims. Similarly, the predict and provide approach may struggle to keep abreast of changing employment patterns and a more flexible plan-monitor-adapt policy framework would now make a better fit with sustainability aims.

Shopping

9.17 Overall the shopping policies remain consistent with both government policy guidance and sustainability aims. However, the retailing world is changing in ways that could not be foreseen only a few years ago and some policies seeking to retain a status quo for shopping centre/frontages may be difficult to sustain against market pressures. It may be better to anticipate and build in the need for more flexibility without abandoning or weakening the fundamental principles underlying these policies.

Housing

9.18 This Chapter is the one that would most obviously benefit from an urban capacity study. The current predict and provide approach puts pressure on open space and many social and environmental assets. Without a clear indication of the capacity of the city to accommodate development the housing provision strategy cannot satisfy the tests of sustainable development. Whilst overall the policies are likely to help to meet sustainability criteria relating to social issues, they raise considerable uncertainties on environmental issues.

They are heavily reliant on cross compliance with other policies and there is an inherent incompatibility and possibly a fundamental policy conflict between housing provision and environmental (and possibly transport related) criteria and issues.

9.19 The Chapter has no policies relating to mixed use developments (even though, commendably, the Schedule to H3 at Parts 2 and 3 allocate such sites).

9.20 Affordable housing policy and policy H6 need to be redrafted in light of changing government policies and good practice.

Community Services

9.21 The most notable issues in the policy framework for Community Services are

a the obvious difficulties the Council must have in implementing CSI with the onus to prove what may, in practice, be impossible (demonstrable need for community facilities etc).

b the degree of policy convergence between the promotion of locations in CS2 and other policies, eg. promoting the neighbourhood centres. Prima facie there is a lost opportunity for each to strengthen the other policy objective. There is scope for some rationalisation of policies, eg. CS4, CS6, CS7, CS8, CS10-12 and CS14, and making provision more flexible with greater emphasis on access for all.

Leisure

9.22 Again, not surprisingly, the policies in this Chapter are highly compatible with the social criteria and most help to reduce travel. Some will contribute to the environmental qualities of specific localities.

9.23 The lack of commitment to deliver the Greenways network other than through developer contributions is disappointing because of the extremely high return these provide for sustainability at little cost. Within the scope of government guidance, a more promotional policy for public art in

new developments would be more consistent with sustainable development principles. Promotion of tourism at some locations is always likely to generate some additional car-borne journeys but these are likely to be outweighed by sustainable tourism benefits.

City Centre

9.24 Generally this suite of policies performs well across the scope of sustainability aims with no significant areas of policy divergence. Policy CC2 is to be encouraged so long as it is clearly understood that it is facilitating a mix of uses within predominantly commercial areas. Thus it could encourage residential uses above shops which helps to maximise the use of city centre building space and infrastructure and generates a more vibrant city at night. The policy should not be read as encouraging purely residential developments in the commercial areas of the city centre, which it does not, although there is some evidence that the policy may have been misinterpreted in this way.

10. Step 7 Appraising the overall effects of proposals

10.1 The purpose of this step is to assess the main effects of the plans locational strategy, principles or programme of proposals, measured against the sustainability criteria. This step has more limited value in the appraisal of a plan that has now been adopted for over three years. Many of the Plan's allocations and proposals will have been implemented or committed, for example, through the grant of planning permissions. Consequently, the appraisal at this stage is limited to a broad review of the overall locational and spatial strategy of the plan in respect of urban form and the green belt and the key objective of developing the potential of the three areas of Avonmouth, the city centre and South Bristol.

10.2 In our view, the priority awarded to the city centre is highly compatible with the aims of sustainable development and the sustainability criteria. This part of the spatial strategy should be continued.

10.3 Whilst the nature of the changes proposed in South Bristol are less clear, there are compelling socio economic reasons for the plan's strategy to encourage the regeneration of this quite large area of the city. However, in view of the limited resources and the size of the area, the Plan could identify priority action areas or in some other way more clearly flesh out the objectives and programme to better facilitate monitoring of this part of the strategy.

10.4 Continued development at Avonmouth is important from an economic point of view. There is already a large and growing investment in infrastructure of a regional scale. However, the Plan is less clear about the environmental implications of this element of the strategy. There are obvious potential conflicts with some important issues including sustainable coastal development and management, flood defence, natural coastal processes, biodiversity and landscape character. The appraisal process may need to focus on these potentially important aspects of policy divergence to avoid environmental harm wherever possible, to reduce or mitigate harm where conflict is inevitable and to ensure that all opportunities are taken to enhance the environmental assets and otherwise pursue environmental objectives.

10.5 There is one point of concern in respect of the overall allocations in the plan. This is the apparent lack of take up of the residential allocations. We understand that most of the housing sites allocated on the Proposals Map have not been implemented. This is a most unusual feature of a modern local plan, yet the City has fulfilled its Structure Plan targets, for the plan period to date, almost entirely through

non-allocated sites that have come forward - called "windfall" sites. It is beyond the scope of this Appraisal to undertake an analysis of each allocation to try to identify why it has not been implemented. There could be many reasons.

10.6   The important point here is that if there are fundamental obstacles to development of these sites they need to be reviewed, deleted, re-programmed or action put in place to help overcome the obstacles. In the absence of more information about urban capacity it would not be appropriate for the plan to adopt a revised strategy relying heavily on windfall sites in the future, they may not materialise and by their very nature they are unpredictable.

10.7   The alteration process should try to establish the reasons why the housing allocation strategy appears not to be working, at least yet, and review what may need to be done to provide more certainty about meeting housing targets with an appropriate mix of house types and locations etc.

11. Step 8 Suggesting or setting requirements for monitoring

11.1   Monitoring is an essential part of the development planning process. Three of the main purposes of monitoring are:

1. To assess the performance of a plans policies: Have the policies been adhered to, are the sustainability aims of the policies being fulfilled and is the scope of the plans policies still relevant and adequate?

2. To assess the performance of the plans proposals: Are the effects of the Plans proposals as predicted in the appraisal?

3. To provide better information: To reduce the degree of uncertainty and to increase the accuracy and objectivity of professional judgements in future plan appraisals.

11.2   Planning authorities already monitor some aspects of development plans, eg. housing developments and employment, but, on their own, these will not be likely to be the best indicators of sustainable development. To be effective, monitoring should be based explicitly on specific indicators and targets that may help to inform the understanding of socio - economic and environmental change in the area and the inter-relationships of policies and cross compliance.

11.3   It is also important to appreciate that the local plan is only one contribution towards the City's drive to more sustainable development, albeit a very important one. it cannot achieve sustainable development alone. It is part of a suite of other planning policy frameworks ranging from national planning guidance, through Regional Planning Guidance, the Structure Plan and on to Supplementary Planning Guidance. There are also many other strategies and policy tools of the Council and its partners. All of these interact and help to support one another. Monitoring needs to be seen as part of a much wider picture where Local Plan monitoring is one aspect of a growing assemblage of monitoring activity.

11.4   Sustainability monitoring has not received a high priority anywhere, until very recently, so there is relatively little work to draw upon in considering the monitoring stage of the appraisal. However, it is very likely that only limited resources will be available for monitoring so priorities need to be identified which will help to:

•   Reduce uncertainty and

•   Sustain irreplaceable social, economic, environmental and cultural assets that if lost can never be replaced or recreated.

11.5   There is little point in expending scarce resources monitoring the effects of the policies which are reasonably certain and invariably beneficial. In practice, resources will only be available to monitor the priorities and potential

weaknesses or inconsistencies in the Local Plans implementation. Thus, the best aspects to monitor are those where the appraisal indicated either adverse or uncertain effects, or where there is little or no understanding of the effectiveness of a policy framework which is considered to be of particular importance.

11.6 The Local Plan commendably indicates how it is anticipated that each policy will be implemented. This is a good start to the monitoring process as it identified the likely sources of monitoring information. The Local Plan could cross reference relevant policies and proposals with possible indicators and targets, where applicable. Monitoring of these indicators, therefore, would show where specific targets are being met or missed and provide a guide as to how well the Plan is performing in terms of sustainability aims.

11.7 However, identifying indicators for monitoring the effectiveness of development plans has proved to be perhaps the most difficult of all the method steps in recent sustainability appraisal and strategic environmental appraisal research. Various attempts to define indicators have considered a wide range of possible indicators for monitoring the environment, but little work has been done in respect of wider socio-economic issues (5).

11.8 The difficulties have revolved around the need to identify indicators that meet appropriate criteria and selecting indicators relevant to the monitoring purpose and for which information is or could be made available. It should be left for local decision as to which indicators should be selected and what targets may be appropriate. However, the following list of criteria may be a useful starting point in drawing up the monitoring indicators and targets. We are grateful to the Stirling and Clackmannanshire Councils and Scottish Natural Heritage for allowing us to include this list which has been developed from work commissioned by them

Criteria for the Selection of Indicators

1 The indicator, or the information it is calculated from, should be readily available at reasonable cost.

2 The indicator must be about something measurable.

3 An indicator should be meaningful: it should measure or represent something believed to be important or significant in its own right.

4 The indicator should be resonant ie. cogent, appealing and compelling to the public and understandable.

5 There should only be a short time-lag between the state of affairs referred to and the indicator becoming available.

6 The indicator should be based on information which can be used to compare different geographical areas within and outwith the plan area.

7 The availability of the indicator information should be reliable over the whole plan period, the information should be manageable with analysis capable of drawing conclusions about the significance of changes, and although judgements are inevitable, they should be as objective as possible.

8 The indicator should be relevant and appropriate to the scale and purpose of the plan.

9 Indicators should concentrate monitoring on objectives, policies or proposals the effects of which are uncertain.

10 Indicators should monitor cross-compliance between objectives, policies and proposals which may potentially conflict - policy divergence within the plan.

Indicators may be:

a measures of the state of the environment, social conditions or the economy, or

b measures of pressures on the environment, social conditions or the economy, or

c   measures of the environments, societys or the economys responses to pressures for change.

Indicators need not be absolute measures of these conditions but should reflect directions of desirable or undesirable change, in our progress towards development that is more sustainable. Targets, limits or thresholds should be set in relation to each indicator which would act as warning lights indicating whether decisions or changes are moving towards or away from sustainable development. Indicators should directly reflect the environmental, social and economic tests used in a Sustainable Development / Sustainability Appraisal. (6)

12. Future appraisal work

12.1   As explained in section 1 above, sustainability appraisal, at its best, is an ongoing and iterative process. This appraisal of the adopted local plan is the first step in the appraisal of the plan's alteration. As a guide to future work we summarise below our recommendations and methods which could be adopted by the Council during the alteration of the plan.

12.2   The following initiatives would help to inform the next stage of the process:

a   An urban capacity study concentrating on housing, as referred to in PPG 3.

b   An appraisal of the Avonmouth policies and proposals, concentrating on the environmental implications of this element of the locational strategy, testing the allocations against all environmental policies and designations and making these implications more explicit in the altered plan.

c   An assessment of the South Bristol area to help to identify priority issues and areas so as to further refine this element of the locational strategy and to develop more explicit policies, proposals and programmes.

d   A site by site assessment to identify the reasons why the housing allocation strategy appears not to be working and a review of what may need to be done to bring forward the development of these sites, engaging representatives of housing developers and providers.

12.3   We recommend that the Council adopts and continues to use the sustainability aims set out at paragraph 5.2 above and the sustainability criteria set out at 6.3 above, which were used in this appraisal. It would be expected that these will evolve over time and can be modified and adapted, but it would aid consistency in the appraisal process if the basic elements of the 10 aims and 10 criteria were retained; at least until a major review of the plan.

12.4   We recommend that the plan's strategy is modified as suggested at paragraphs 7.3 - 7.4 above and the key objectives are given more prominence in the altered plan. The revised strategy should be subjected to an appraisal against the criteria but we would expect it to be even more highly compatible with the sustainability aims and criteria after modification. This appraisal should be available to the public when the alteration is placed on deposit.

12.5   We recommend that each new or modified policy, and each new or modified proposal, is subjected to a policy appraisal as set out in Appendix A below. This appraisal can be carried out in-house by the Council's planning officers and others with expertise in socio-economic and environmental issues. Each policy or proposal should be appraised by at least two people, one of whom should be the author or originator, the other should be someone with relevant expertise but no direct involvement in that policy or proposal. Policies and proposals should be amended as necessary in light of the findings of the appraisal and the appraisal should be available to the public when the alteration is placed on deposit.

12.6 Officers undertaking the appraisal should be conversant with the appraisal process as a whole and should have the facility of a training workshop before the appraisal is undertaken. The results of the appraisal could be reviewed by an independent consultant to verify the methods used and to check the general validity of the appraisal findings. If such independent review is undertaken, it should be made available to the public with the appraisal when the alteration is placed on deposit.

12.7 The Council could adopt the monitoring criteria in paragraph 11.8, with or without modification. A range of potential indicators and any associated targets could then be developed and discussed with a variety of interested parties, perhaps in a workshop, which would help to refine and select indicators that would chart the direction of change.

12.8 These indicators could then form the focus of future monitoring of the plan's performance in combination with the monitoring of housing, employment and other factors which is already undertaken.

Legend: Sustainability Criteria

HCF Improve the quantity, range and quality of the housing stock or community facilities.

EQS Enhance the appearance of urban and rural environments or make them cleaner, healthier or safer.

ACC Improve accessibility of town and neighbourhood centres, schools, health facilities or sport and recreational facilities by walking, cycling or public transport.

ECG Encourage sustainable economic growth by enhancing regional and local industrial, commercial, retail, warehousing, distribution and freight transport infrastructure and facilities.

EMP Provide more and a wider range of accessible employment opportunities via mixed use developments, employment land allocations or better education and training opportunities.

POL Reduce waste and / or the risk of pollution of air, water, sea, land or soil.

TRA Reduce the need to travel and / or journey lengths.

UNS Fit well with Bristol's urban form and not increase the risk of flooding or land instability affecting development.

EHC Conserve, enhance or restore the quality, quantity, character, distribution, distinctiveness and diversity of environmental, historical or cultural assets / resources.

RES Encourage appropriate forms of renewable energy, or to encourage the use or consumption of either renewable or non-renewable resources in a more sustainable way.

✔ Liklihood of significant beneficial effect(s)

(blank) cell is criterion not relevant or liklihood of no signicance or only neutral effect(s)

✘ liklihood of significant adverse effect(s) and / or liklihood of policy divergence with sustainability objectives in the Plan or liklihood of conflict with other sustainability aims

? Uncertain or unpredictable effect(s) and / or some potential for policy divergence with sustainability objectives in the Plan or potential for conflict with other sustainability aims. High reliance on cross compliance in the application of the objective or high reliance on assessment of specific proposal promoted by the policy the appraisal of which would come later in the process and is flagged up here as an issue.

Bristol Local Plan Sustainability Appraisal – Policy Appraisal Matrix

Ref	Topic	HCF	EQS	ACC	ECG	EMP	POL	TRA	UNS	EHC	RES	Comments
ME1	Renewable energy installations		?				✔		?	?	✔	Visual quality of all landscapes important
ME2	Location/design of developments		✔		?		✔					May deter some forms of industry
ME3	Hazardous substances		✔		✘	?	✔					Needs positive planning provision could deter
ME4	Impact of noise	✔	✔				✔			✔		
ME5	Protection of groundwater supplies		✔				✔				✔	
ME6	Contaminated land		✔				✔			✔	✔	
ME7	Water Industry Investment		✔				✔			?	✔	Narrow visual interest, landscape character
ME8	Coastal Area		✔		?	?	✔		✘	?	✘	See text of report
ME9	Contaminated Land		✔		?	?	✔		✘	?	✘	See text of report compliance with NE5??
ME10	Dev adjacent to rivers watercourses		✔				✔		✔	✔		
ME11	Recycling						✔				✔	
ME12	Avoidance of Dereliction		?				?				✔	Poor wording doesn't achieve aim
ME13	Development on Unstable Land		✔						?			Not shown on a plan. Should avoid first
ME14	Public Utilities		✔							✔		Update and expand to meet PPG
NE1	Open Space		✔						✔	✔	✔	Key policy needs urban capacity study to back up
NE2	Landscape Features		✔						✔	✔		Needs character approach see PPG7
NE3	Trees and Woodlands inc the CF		✔				✔		✔	✔	✔	No ref to Community Forest in policy
NE4	Watercourses and Wetlands		✔				✔		✔	✔	✔	Could be in ME chapter good env policy
NE5	SNCIs								✔	✔	✔	Upgrade III – SSSI national policy confusion as to city/county sites
NE6	The Wildlife Network								✔	✔	✔	Absence Reg 37 policy
NE7	Local Nature Reserves			✔						✔		Are they designated – do they meet EN standard
NE8	Protected Species								✔	✔	✔	
NE9	Historic Landscapes								✔	✔	✔	
NE10	Landscape Restoration						✔		✔	?	✔	Serious risk of promoting enabling development
NE11	Natural Environment Consideration		✔						✔	✔	✔	Good policy when does it apply ?
NE12	Open Space Creation		✔	✔				✔	✔	✔	✔	Key policy – urban capacity pressure Enhancement on OS
NE13	Green Belt Boundary	?	?	?	?	?		✘	✔	?	✔	Usual green belt tensions
NE14	Green Belt Development Control		✔						✔	✔	✔	
B1	Design Criteria and Development	✔	✔	✔			✔			✔		Odd seem out or context – character approach

Bristol Local Plan Sustainability Appraisal – Policy Appraisal Matrix

Ref	Topic	HCF	EQS	ACC	ECG	EMP	POL	TRA	UNS	EHC	RES	Comments
B2	Local Context		✓						✓	✓		Good suite of policies but could be rationalised. Need stronger cross ref to SPG, extend SPG and transfer detail from LP
B3	Accessibility		✓	✓				✓				
B4	Safety and Security		✓	✓								
B5	Layout and Form		✓						✓	✓	✓	
B6	Building Exteriors and Elevations		✓							✓		
B7	Landscape and Environment Works		✓							✓		
B8	Dev Criteria for New Housing	✓	✓				✓			✓	✓	
B9	House Extensions and Alterations		✓							✓		
B10	Shopfront Guidelines			✓						✓		
B11	Advertisements: Illuminated Signs									✓		
B12	Advertisements: Hoardings									✓		
B13	CAs and LBldgs: General Principles									✓	✓	B13 needs careful examination Could split B13 - B22 into a separate Chapter, reduce duplication/repetition
B15	Streets and Open Space		✓							✓	✓	look at scope for transfer to SPG and add NE9 and NE10 to form a Historic
B16	New Buildings									✓	✓	Environment chapter as per the PPG
B17	Extensions to Buildings									✓	✓	
B18	Alterations to Traditional Buildings									✓	✓	
B19	Listed Buildings : Alterations									✓	✓	
B20	LBldgs: Urgent repairs demolition									✓	✓	
B21	Demolition: LBldgs and CAs									✓	✓	
B22	Sites of Archaeological Significance									✓	✓	
M1	Transport Dev Control Criteria		✓	✓				✓		✓	✓	Looks good but test is how did planners use it
M2	Development in Traffic Free Areas		✓	✓						✓		
M3	Public Transport for large devs			✓			✓	✓				
M4	Public Transport: Park and Ride		?	✓			✓	✓		?		Local environment criterion needed
M5	Park and Ride: Avonmouth site		?	✓			✓	✓		✗	?	What about SNCI? Is it implemented?
M6	Bus and Coach Station Marlborough Street			✓			✓	✓				I and II appear to use to conflict with each other
M7	Alternative Coach Station		?	✓			✓	✓		?		

Bristol Local Plan Sustainability Appraisal – Policy Appraisal Matrix

Ref	Topic	HCF	EQS	ACC	ECG	EMP	POL	TRA	UNS	EHC	RES	Comments
M8	Coach Facilities			✓				✓				
M9	Temple Meads			✓			✓	✓			✓	
M10	Rail Improvements			✓				✓		✓		Rather negative – encourage?
M11	Rail Stations			✓			✓	✓			✓	
M12	Protection of Ex-Rail Corridors		✓	✓			✓	✓		✓	✓	?? Site specific proposal
M13	LRT Safeguarded Routes											
M14	Parking: Commuter Parking			✓				✓				
M15	Parking: Commuted Payments			✓		✓	✓	✓				
M16	Cycling and Pedestrians			✓			✓				✓	Lack of specific proposals disappointing
M17	Traffic Management Avonmouth		?	?				?		?		Any other TM proposals. Policy doesn't reflect text
M18	Freight: Rail Freight Facilities				✓		✓				✓	
M19	New Roads Env/economic effects		?	?	?		?	?		?	?	Need to review dated, vague and uncertain
M20	Improvements to Primary Roads											?? Site specific proposal
M21	PR Network: Redcliffe Way									✓	✓	?? Site specific proposal
M22	Avonmouth/Severnside											?? Site specific proposal
M23	Minor Road Improvements											?? Site specific proposal
M24	Highway Imp/abandon lines											?? Site specific proposal
EC1	Growth: Environmental Considerations		✓	✓	✓		✓	✓		✓	✓	
EC2	Growth: Industry and Warehousing		?		✓	✓		?	?	?		Predict and provide rather than plan monitor adapt depends on X compliance
EC3	Growth: B1 Development		?		✓	✓		?	?	?		
EC4	Protect exg employ opportunities		✓		✓	✓		✓	?	?		Can lead to under use see text
EC5	Protect industrial sites/premises		✓		✓	✓		✓	?	?		See text
EC6	Small Businesses				✓	✓		✓				No encouraging, see text
EC7	Ind and Commercial Regeneration				✓	✓		✓		✓	✓	High compatibility with SD
EC8	Industrial Nuisance		✓		?	?	✓			✓		Deterrent/restraint no positive provision
EC9	Car Breakers and Open Site Users		?		?	?				?		No positive provision
EC10	Community benefit economic dev	✓			?	?						Is this appropriate, does it work?
S1	Protection of Shopping Facilities			✓	✓			✓				
S2	Existing Shopping Centre Hierarchy			✓	✓			✓				
S3	Opportunities for Expansion											?? Site specific proposal

Bristol Local Plan Sustainability Appraisal – Policy Appraisal Matrix

Ref	Topic	HCF	EQS	ACC	ECG	EMP	POL	TRA	UNS	EHC	RES	Comments
S4	Upgrading and Regeneration											?? Site specific proposal
S5	Frontages: Primary		✓		✓	✓						Uncertain what would qualify
S6	Frontages: Secondary		✓		✓	✓						
S7	Local Shops			✓		✓						
S8	Control of Food and Drink Uses		✓									
S9	Out of Centre Shopping		✓	✓		✓						
S10	Out of Centre: Non-Food Retail											?? Site specific proposal
S11	Markets and Car Boot Sales		✓			✓						
S12	Safeguarding Existing Market Sites			✓								
H1	Retention of Residential Accom	✓		✓				✓				
H2	Land allocated for Housing Dev	✓	?			?		?	?	?		Urban capacity/depends on X compliance see text
H3	Site identified for Development											?? Site specific proposals
H4	Backland Sites	✓	?			?				?		Need to revisit (iii) ??
H5	Accessible Housing		✓	✓								
H6	Community Benefit from Dev	✓	✓	✓								Now 25 not 40 units, does it work?
H7	Conv/Sub-Division of Exg Houses	✓	?							?		Vague – needs a PAN
H8	Upper Floors over Shops/Offices	✓	✓	✓						✓		
H9	Affordable Housing Local Needs	?	?	?		?				?		Vague, is it consistent with national policy?
H10	Bedsit, shared accomm and hostels	✓										
H11	Residential Care Nursing Homes	✓	✓							?		Character and amenity criterion?
H12	Gypsies/Travelling People	✓		✓								
H13	Travelling Showground People	✓										?? Site specific proposal
H14	Houseboats	✓								✓		
CS1	Community Service Land and Bldgs	✓										Odd wording, hard to implement?
CS2	Neighbourhood community facilities	✓		?				?				Are these all in community centres if not why not?
CS3	Comm centres, youth clubs libraries	✓										?? Site specific proposal
CS4	City Farms	✓										
CS5	Sites for New School Buildings											?? Site specific proposal
CS6	Expansion schools and colleges FE	✓	?	?		✓		?				Public transport as per HE
CS7	Higher Education Facilities	✓	✓	✓		✓		✓				

Bristol Local Plan Sustainability Appraisal – Policy Appraisal Matrix

Ref	Topic	HCF	EQS	ACC	ECG	EMP	POL	TRA	UNS	EHC	RES	Comments
CS8	Primary Health Care Facilities	✓	✓	?								Accessibility criterion?
CS9	New Hospital Facilities	✓										
CS10	Community Resource Centres	✓										
CS11	'Day-Care' Facilities	✓										
CS12	New Places of Worship	✓										
CS13	New Crematoria and Cemetery											?? Site specific proposal
CS14	Emergency Services	✓	✓									
L1	Protect play fields and rec grounds	✓	✓	✓				✓		✓		Key policy, but odd wording if unacceptable should refuse, link to NE1 + NE12 and capacity study
L2	Childrens Play/Amenity Space	✓		✓								
L3	Greenways Walking and Cycling		✓	✓				✓				Lack of commitment to provide
L4	Greenways: Additional Facilities	✓	✓	✓								
L5	Water Based Leisure/Rec Facilities											?? Site specific proposal
L6	Informal Rec and Leisure Citywide											?? Site specific proposal
L7	Sport Region/Citywide Facilities											?? Site specific proposal
L8	Sports Stadia	✓		✓								
L9	Sport: Criteria for New Facilities	✓		✓				✓				
L10	Arts and Entertainment: Public Art									✓		
L11	Tourism: Leisure Development					✓		?				Could generate more car trips
CC!	Major Regeneration Areas			✓	✓	✓			✓	✓		
CC1	Gateway Schemes			✓	✓	✓				✓		
CC2	Mixed Commercial Areas	✓		✓	✓	✓		✓				Step towards mixed use areas
CC3	Dev Opportunities Major Institutions											?? Site specific proposal
CC4	The University of Bristol	✓		✓		✓						
CC5	Hospital Services			✓		✓		✓				
CC6	Coach Parking		✓									
CC7	Pedestrian Links		✓	✓						✓		
CC8	Streets for People		✓							✓		
CC9	Water Frontages									✓		
CC10	Water Frontages			✓				✓				

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