

# West of England Joint Spatial Plan

Consolidated Sustainability Appraisal  
Non-Technical Summary



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# **Sustainability Appraisal of the West of England Joint Spatial Plan**

## **Consolidated Sustainability Appraisal Report: Non-Technical Summary**

Compiled and prepared by LUC including input from the West of England Unitary Authorities and West of England Combined Authority  
November 2018

**Project Title:** Supplementary Sustainability Appraisal work for the West of England Joint Spatial Plan

**Client:** West of England Unitary Authorities

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November 2018

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# 1 Introduction

- 1.1 This Non-Technical Summary relates to the 'Consolidated' Sustainability Appraisal Report which has been prepared by LUC on behalf of the West of England Unitary Authorities as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the West of England Joint Spatial Plan (JSP). The four West of England Unitary Authorities are: Bristol City Council (BCC), Bath and North East Somerset Council (B&NES), North Somerset Council (NSC) and South Gloucestershire Council (SGC).

## Purpose of this SA Report

- 1.2 The Consolidated SA Report responds to points raised in the two letters sent by the Inspectors appointed to examine the JSP (ED01 and ED02) and the specific request that the Councils consider the need for further SA work in respect of the spatial strategy and employment.
- 1.3 In light of the Inspectors' points raised, the Consolidated SA Report seeks to draw together, and present in a consolidated form, the SA work that was previously carried out.
- 1.4 The Consolidated SA Report re-presents the elements of previous SA work undertaken that meet the requirements of the SEA Regulations, and provides additional information to demonstrate that the requirements of the SEA Regulations are met in full (see **Table 2.1**). In particular, the Consolidated SA Report provides a clear audit trail of the reasonable alternatives considered during development of the JSP, describes the likely significant effects of the JSP and the reasonable alternatives considered, and outlines the reasons for selecting or discounting those reasonable alternatives.
- 1.5 The Sustainability Appraisal Report and this Non-Technical Summary incorporate all of the work undertaken by LUC and the West of England Unitary Authorities.
- 1.6 This Non-Technical Summary relates to the Consolidated SA Report for the Publication version of the JSP, which was submitted for examination in April 2018.

## Outline of the West of England Joint Spatial Plan as submitted

- 1.7 The JSP is a formal Development Plan Document (DPD) being prepared by the four West of England (WoE) Unitary Authorities and will cover the period 2016-2036.
- 1.8 The JSP will provide the vision for the delivery of homes and jobs needed to address the housing and employment land requirements and spatial distribution strategy for the Wider Bristol and Bath housing market areas, (based on the findings of the Wider Bristol and Bath Strategic Housing Market Assessments (SHMAs)). The JSP contains seven policies supported by a Key Diagram which displays the broad areas for strategic housing, employment and infrastructure growth and the general extent of the Green Belt. The JSP identifies twelve Strategic Development Locations, but does not allocate sites. Site specific allocations and policy designations will be determined through each Unitary Authority's Local Plan, which will need to be in general conformity with the JSP and the strategic growth identified.
- 1.9 The Spatial Strategy set out in the JSP has been formulated to deliver the Objectively Assessed Need (OAN) of 97,800 new homes for the plan period 2016-2036. This comprises 85,000 dwellings for the Wider Bristol HMA and 12,800 dwellings for the Bath HMA. To enable flexibility, the JSP makes provision for an overall supply of 105,500 new homes for the plan period, of which around additional 24,500 should be affordable homes. The housing target supports the planned job growth of 82,500 jobs for the period 2016-2036.

## Vision and Strategic Priorities

- 1.10 The Vision for the West of England JSP responds to critical issues identified for the area in the Issues and Options document, and the WoE Local Enterprise Partnership Strategic Economic Plan economic vision for the sub-region to 2036. It also seeks to reflect its social and environmental aspirations.
- 1.11 The JSP also contains four Strategic Priorities which seek to respond to the critical issues identified for the West of England. These relate to meeting the identified housing need, including affordable housing, pursuing inclusive economic growth, delivering a spatial strategy focussed on Bristol, Bath and Weston-super-Mare while aligning development with infrastructure, taking a place making approach and integrating green infrastructure and reducing greenhouse gas emissions, and protecting and enhancing the sub-region's natural, built and historic environment.

## Policies

- 1.12 **Policy 1** sets out the housing to be provided within the West of England over the plan period (at least 105,500 new homes), and how much is to be distributed between the four authorities.
- 1.13 **Policy 2** sets out the spatial strategy, which shows that the housing requirement will be achieved through:
- Delivery of existing Local Plan commitments (61,500 dwellings).
  - Maximising the sustainable development of previously developed land and other appropriate opportunities within existing urban areas – 'urban living' (16,200 dwellings).
  - Enabling non-strategic sustainable development at locations identified and brought forward through local plans to meet the UA housing and employment requirements – 'non-strategic growth' (3,400 dwellings).
  - Small site windfall development (6,800 dwellings) with locations to be identified in UA Local Plans.
  - Allocation in Local Plans of 12 Strategic Development Locations (17,600 dwellings).
- 1.14 **Policy 3** sets the affordable housing target for the West of England up to 2036 at 24,500 net new affordable dwellings to include a range of tenure and unit types.
- 1.15 **Policy 4** supports the delivery of 82,500 additional jobs in the West of England between 2016 and 2036. Development is to be allowed at the key strategic employment locations to ensure the continued economic growth of the West of England. New employment land may be identified at the SDLs and the amount of land to be allocated will respond to the amount of residential development proposed and the existing community in the area.
- 1.16 **Policy 5** sets out the place shaping principles for the West of England which should guide development in terms of the delivery of high quality and sustainable places. The principles are to be used to prepare the SDL's concept frameworks as well as future master planning in local plans, and to support existing communities to bring about sustainable urban living and regeneration led development.
- 1.17 **Policy 6** sets out the strategic infrastructure requirements for the plan period including transport, flood management and green infrastructure. Strategic transport infrastructure identified on the Key Diagram of the JSP is to be delivered during the period 2016 to 2036 with priority to be given to schemes which support the delivery of the JSP's spatial strategy. Provisions which would promote an integrated corridor-based approach to transport improvements, sustainable and active travel choices are to be supported.
- 1.18 **Policy 7** states that the following 12 SDLs are to be delivered over 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.

- 1.19 The guiding principles common to all the strategic development locations are set out in Policy 5 and detailed location-specific requirements are set out in Policies 7.1 - 7.12 (one for each SDL).

## 2 Sustainability Appraisal

- 2.1 The West of England Unitary Authorities are required by law to carry out a Sustainability Appraisal and Strategic Environmental Assessment (SEA) of the JSP. The Government recommends that these two legal requirements are met through one integrated process, referred to as Sustainability Appraisal.
- 2.2 The purpose of SA is to promote sustainable development through the better integration of sustainability considerations into the preparation and adoption of plans. It should be viewed as an integral part of good plan making, involving ongoing iterations to identify and report on the likely social, economic and environmental effects of the plan and the extent to which sustainable development is expected to be achieved through its implementation.
- 2.3 The SA has been undertaken in stages alongside the preparation of the Local Plan in order to provide sustainability guidance as the plan is developed. SA must be carried out in accordance with Government guidance and (as an integrated SA and SEA process is being undertaken) must meet the requirements of the European Strategic Environmental Assessment Directive.
- 2.4 **Table 2.1** below signposts how the requirements of the SEA Regulations have been met within the SA work undertaken to date (presented in the full Consolidated SA Report and this Non-Technical Summary).

**Table 2.1 Requirements of the SEA Regulations and where these have been addressed in this SA Report**

SEA Regulation Requirements	Covered in the SA report and Non-Technical Summary?
Preparation of 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 (Reg. 12). The information to be given is (Schedule 2):	
1) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 3 in the Consolidated SA Report and summarised in Chapter 3 of this Non-Technical Summary.
2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Chapter 3 (Table 3.3) and Appendix 3 in the Consolidated SA Report and summarised in Chapter 3 of this Non-Technical Summary.
3) The environmental characteristics of areas likely to be significantly affected;	Chapter 3 (Table 3.3) and Appendix 3 in the Consolidated SA Report and summarised in Chapter 3 of this Non-Technical Summary.
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 Directives 79/409/EEC and 92/43/EEC;	Chapter 3 (Table 3.3) and Appendix 3 in the Consolidated SA Report and summarised in Chapter 3 of this Non-Technical Summary.
5) The environmental protection, objectives, established at international, Community or national 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;	Chapter 3 and Appendix 2 in the Consolidated SA Report and summarised in Chapter 3 of this Non-Technical Summary.

SEA Regulation Requirements	Covered in the SA report and Non-Technical Summary?
6) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 5 and Appendix 7 in the Consolidated SA Report and summarised in Chapters 6 and 7 of this Non-Technical Summary.
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;	Chapter 5 and Appendix 7 in the Consolidated SA Report and summarised in Chapter 7 of this Non-Technical Summary.
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;	Chapter 2, Chapter 4 and Appendix 5 in the Consolidated SA Report and summarised in Chapter 5 of this Non-Technical Summary.
9) a description of measures envisaged concerning monitoring in accordance with Reg. 17;	Chapter 6 in the Consolidated SA Report and summarised in Chapter 7 of this Non-Technical Summary.
10) a non-technical summary of the information provided under the above headings.	This is the Non-Technical Summary of the SA Report for the Publication version of the JSP.
The report shall include 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 (Reg. 12(3))	Addressed throughout the Consolidated SA Report and this Non-Technical Summary.
<p><b>Consultation:</b></p> <ul style="list-style-type: none"> <li>authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5))</li> </ul>	Consultation on the SA Scoping Report was undertaken between June and July 2015.
<ul style="list-style-type: none"> <li>authorities with environmental responsibility and the public, shall be given an opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13)</li> </ul>	<p>Consultation on the Issues &amp; Options for the JSP and SA Report took place in November 2015; for the Towards the Emerging Spatial Strategy and SA Report in November 2016 and on the Publication version of the JSP and SA Report in November 2017.</p> <p>Further consultation on the Consolidated SA Report as well as this Non-Technical Summary document is taking place between November 2018-January 2019.</p>

SEA Regulation Requirements	Covered in the SA report and Non-Technical Summary?
<ul style="list-style-type: none"> <li>other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).</li> </ul>	N/A
<b>Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)</b>	
<p><b>Provision of information on the decision:</b> When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>the plan or programme as adopted</li> <li>a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the consultation opinions expressed and the results of consultations entered into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>the measures decided concerning monitoring</li> </ul>	To be addressed after the Joint Spatial Plan is adopted in a separate SEA/SA Adoption Statement. However, the “reasons for choosing the JSP as submitted in light of the other reasonable alternatives dealt with” is set out in Chapter 4 and Appendix 5.
<p><b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Reg. 17)</p>	To be addressed after the Joint Spatial Plan is adopted, but Chapter 6 in the Consolidated SA Report and Chapter 7 of this Non-Technical Summary set out the likely significant effects identified in the SA and the proposed monitoring measures to be used.
<p><b>Quality assurance:</b> environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.</p>	The Consolidated SA report and this Non-Technical Summary have been produced in line with current guidance and good practice for SEA/SA and this table demonstrates where the requirements of the SEA Regulations have been met.

2.5 The approach that has been taken to the SA of the West of England JSP to date is described below.

## SA Stage A: Scoping

2.6 The SA process began in June 2015 with the production of a draft Scoping Report for the JSP. The Scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The Scoping Report presented the outputs of the following tasks:

- Policies, plans and programmes of relevance to the JSP were identified so that account could be taken of relationships between the JSP and other policies, plans, programmes and sustainability objectives. This review was based on the review that was undertaken for the latest Development Plan SAs produced by each authority and was updated to take into account new policies, plans and programmes.
- Baseline information was collected on environmental, social and economic issues in the West of England. This baseline information provides the basis for predicting and monitoring the likely effects of options for policies and Strategic Development Locations and helps to identify alternative ways of dealing with any adverse effects identified.

- A Sustainability Appraisal framework was presented, setting out the SA objectives against which options and subsequently policies would be appraised. The SA framework provides a way in which the sustainability impacts of implementing a plan can be described, analysed and compared. It comprises a series of sustainability themes and associated objectives that can be used to 'interrogate' options and draft policies during the plan-making process. These SA objectives define the long-term aspirations of the plan area with regard to social, economic and environmental considerations. During the SA, the performance of the plan options (and later, policies) are assessed against these SA objectives.

- 2.7 Public and stakeholder participation is an important part of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development. The Draft Scoping Report was subject to consultation between 15<sup>th</sup> June and 20<sup>th</sup> July 2015, later extended to 24<sup>th</sup> 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 then revised, responding to the comments received during the consultation, and was republished in November 2015. Appendix 1 in the Final Scoping Report listed the comments that were received during the Scoping consultation and described how each one had been addressed. The schedule of Scoping consultation responses and how each one had been addressed can now be found in Appendix 1 of the Consolidated SA Report.
- 2.8 Updated versions of the review of plans, policies and programmes and the baseline information are presented in Chapter 3 and Appendices 2 and 3 of the Consolidated SA Report.
- 2.9 **Table 2.2** overleaf presents the current SA framework for the JSP as shown in the Final Scoping Report (November 2015). The table also shows how all of the 'SEA topics'<sup>1</sup> have been covered by the SA objectives in the SA framework.

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<sup>1</sup> See requirement 6 of the SEA Regulations shown in **Table 2.1**. The SEA topics are: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between these factors.

**Table 2.2 SA framework for the West of England Joint Spatial Plan**

Themes	SA Objectives	Related SEA Topic(s)
Theme 1: Improve the health, safety and wellbeing of all	1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	Landscape Human Health Population
	1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	Air Human health Population
	1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	Material assets Population
Theme 2: Support communities that meet people's needs	2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	Material assets Population
	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	Material assets Population
	2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	Material assets Human health Population
	2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	Material assets Population
	2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	Material assets Population
	2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	Population
Theme 3: Develop a diverse and thriving economy that meets people's needs	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	Material assets Population
	3b. Achieve reasonable access to major employment areas <i>Major Employment sites:</i> - Enterprise Zones - Locally designated key employment areas	Material assets Population
Theme 4: Maintain and improve environmental quality and assets	4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings <i>Assets:</i> - Listed Buildings, - Conservation Areas, - Scheduled Ancient Monuments, - Registered Historic Parks and Gardens, - Unregistered Historic Parks and Gardens	Cultural heritage

Themes	SA Objectives	Related SEA Topic(s)
	<ul style="list-style-type: none"> <li>- Registered Battlefields,</li> <li>- Undesignated local assets (HER)</li> <li>- World Heritage Site</li> <li>- Protected Wreck Site</li> <li>- Locally listed structure</li> <li>- Town and village greens</li> <li>- Local Green Spaces</li> </ul>	
	<p>4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)</p> <p><i>National Sites and assets:</i></p> <ul style="list-style-type: none"> <li>- SSSI</li> <li>- National Nature Reserves</li> <li>- Local Nature Reserves</li> <li>- UK Priority Habitat</li> <li>- Local Sites</li> <li>- SNCI – All authorities</li> <li>- Wildlife Corridors – Bristol</li> <li>- Ecological Networks</li> </ul>	Biodiversity Fauna Flora Climatic factors Landscape Material assets
	<p>4c. Minimise impact on and where appropriate enhance valued landscapes</p> <p><i>National designations:</i></p> <ul style="list-style-type: none"> <li>- AONB</li> </ul>	Landscape
	4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	Soil
	4e. Minimise the loss of productive land, especially best and most versatile agricultural land	Soil
	4f. Minimise vulnerability to tidal / fluvial flooding (taking account of climate change), without increasing flood risk elsewhere	Human health Climatic factors Water
	4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere	Human health Climatic factors Water
	4h. Minimise harm to, and where possible improve, water quality and availability	Human health Water
Theme 5: Minimise consumption of natural resources	5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	Material assets Population Air Climatic factors
	5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	Climatic factors Material assets

## SA Stage B: Developing and refining options and assessing effects

- 2.10 Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.
- 2.11 Regulation 12 (2) of the SEA Regulations requires that:  
"The (environmental or SA) report must 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."
- 2.12 Any alternatives considered for the plan need to be 'reasonable'. Alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site options that are unavailable or undeliverable.
- 2.13 It should be noted that the SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability, ability to address local issues and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan. The West of England Unitary Authorities have used the SA of the JSP alongside other relevant information as part of the decision making processes. The SEA Regulations require an Adoption Statement (post-adoption of the JSP) to show how the SA findings have been taken into account, but the plan-makers are not required to make all their decisions based on the SA alone.
- 2.14 Chapter 4 of the Consolidated SA report provides an outline of the alternatives considered for the JSP throughout its preparation, reasons for selecting preferred alternatives and discounting others and describes the SA findings for the reasonable alternative options considered for the JSP. The reasonable alternatives considered at each stage are also summarised further ahead in this Non-Technical Summary under the heading 'Consideration of reasonable alternatives for the JSP'.

## SA Stage C: Preparing the Sustainability Appraisal report

- 2.15 The Consolidated SA Report and this Non-Technical Summary describe the process that has been undertaken in carrying out the SA of the West of England JSP. They set out the findings of the appraisal of reasonable alternatives that have informed the Vision, Strategic Objectives, Policies and Strategic Development Locations presented in the JSP, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects).

## SA Stage D: Consultation on the West of England Joint Spatial Plan and SA Reports

- 2.16 The Consolidated SA Report and this Non-Technical Summary are being published for consultation between November and January 2019. Responses will be collated and passed to the Inspectors examining the JSP. Depending on the outcomes of the consultation and the conclusions of the SA, further changes to the JSP may be proposed during the Examination in Public hearings. There will then be a further round of consultation on the Proposed Modifications to the JSP, accompanied by an updated SA Report (or Addendum, depending on the scale and nature of the modifications proposed).

## SA Stage E: Monitoring implementation of the JSP

- 2.17 Recommendations for monitoring the likely significant social, environmental and economic effects of implementing the West of England JSP are presented in Chapter 6 of the Consolidated SA Report and are described further ahead in this Non-Technical Summary.

## 3 Policy Context

### Relationship with other relevant plans and programmes and relevant environmental protection objectives

- 3.1 The JSP is not prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage. It must also conform to environmental protection legislation and contribute to achieving the sustainability objectives established at the international and national levels.
- 3.2 A review has been undertaken of the other plans, policies and programmes that are relevant to the JSP. This was originally presented in the SA Scoping Report and has subsequently been reviewed and updated at later iterations of the SA Report. The Consolidated SA Report presents this complete review in Appendix 2.
- 3.3 There are a wide range of EU Directives (including the 'SEA' Directive) relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy and therefore need to be considered within Local Plans. The most significant development in terms of the national policy context for the JSP was the publication of the National Planning Policy Framework (NPPF) (2012) which replaced the suite of Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs). The JSP must be in conformity with the NPPF.
- 3.4 While the government published a revised National Planning Policy Framework in July 2018, the JSP was submitted for examination in April 2018 and will be examined against the 2012 version. Therefore, the 2012 NPPF is the document which is of most relevance when considering the national planning context for the JSP. Both the 2012 NPPF and the 2018 NPPF include a requirement for sustainability appraisals of local plans to be undertaken and to meet the requirements of the SEA Directive.
- 3.5 The 2012 NPPF sets out information about the purposes of local plan-making (paragraphs 150-157), stating that:
- "Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development."*
- 3.6 The NPPF also requires Local Plans to be 'aspirational but realistic'. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.
- 3.7 The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
- the homes and jobs needed in the area;
  - the provision of retail, leisure and other commercial development;
  - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - the provision of health, security, community and cultural infrastructure and other local facilities; and
  - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

### 3.8 In addition, Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

### Local plans, policies and programmes

- 3.9 The SDLs identified in the JSP will be brought forward as specific allocations through each West of England authority's new Local Plan. New site-specific allocations and policy designations in Local Plans will need to be in conformity with the JSP. Work has commenced on preparing the four Local Plans based on the current JSP proposals, although these will not be finalised until after examination and adoption of the JSP. The Local Plans of neighbouring authorities will deal with housing need identified within those authority boundaries, and through Duty to co-operate discussions, no unmet housing need from outside the West of England is being planned for within the JSP.
- 3.10 The West of England local authorities are currently in the process of developing a new Joint Local Transport Plan (JLTP4) for the area. This will cover the period to 2036 and will therefore align with the JSP. The JLTP4 is currently being prepared, with consultation anticipated to take place in January 2019.
- 3.11 The JLTP4 will develop a long-term transport policy framework that is consistent with the JSP. It will develop a long-term investment programme shaped by a set of objectives that build on the JLTP3 goals.

### Baseline Information

- 3.12 In line with the requirements of the SEA Regulations, consideration has been given to the current state of the environment in the West of England. Detailed baseline information for the plan area is presented in Appendix 3 of the Consolidated SA Report. As well as environmental issues, the baseline information includes a description of social and economic issues in the sub-region.
- 3.13 The baseline information contributed to the identification of a set of key sustainability issues for the plan area, which relates to the SA framework (i.e. the set of SA objectives) that were used to appraise the emerging JSP policies. The Consolidated SA Report presents the key sustainability issues and likely evolution of the environment separately at Chapter 3. **Table 3.1** below sets out the key sustainability issues for the West of England and, in line with the requirements of the SEA Regulations, a best estimate is also given in the final column of the likely evolution of the environment in the West of England if the JSP were not to be implemented.

**Table 3.1 Key sustainability issues for JSP area and likely evolution without the JSP**

Key sustainability issue	Likely Evolution without the Plan (West of England JSP)
<p>There are parts of the plan area which are not achieving national objectives in terms of <b>air quality</b>. This issue is of particular concern within the AQMAs which have been declared in three of the respective local authority areas.</p>	<p>Bristol City Council and B&amp;NES are in the process of preparing Clean Air/Air Quality Action Plans which aim to reduce concentrations of air pollutants and exposure to air pollution. These Action Plans should help to improve air quality within Bristol and B&amp;NES, and continue the recent downward trends in NO<sub>2</sub> concentrations. Without a more co-ordinated strategic approach to development and transport infrastructure (as contained in the JSP), existing levels of NO<sub>2</sub> and PM10 could be maintained or increase due to the additional growth required over the plan period, particularly in urban centres.</p> <p>However, in the absence of the JSP, there would still be the West of England Joint Local Transport Plan, informed by the Joint Transport Study which has been prepared alongside the JSP and is a major transport programme designed to provide an improved public transport system, relieve traffic congestion and lower emissions. It proposed a Transport Vision that will be taken into account during the forthcoming update of the Joint Local Transport Plan. Therefore, air quality is likely to still improve without implementation of the JSP.</p>
<p>While the plan area displays generally higher levels of life expectancy, the figure for Bristol is lower than the national average. Inequality in <b>health</b> is displayed in the more deprived parts of the plan area with levels of poor health more prevalent at these locations.</p>	<p>The JSP can ensure the built environment contributes to delivering health benefits, and supports healthy, inclusive and active communities. Without a co-ordinated strategic approach in place (as contained in the JSP) life expectancy and health in general is likely to stay the same but not improve, as the location and quality of new development may not deliver health benefits.</p>
<p>The level of <b>service deprivation</b> displayed in the rural parts of the plan area is relatively high.</p>	<p>Without a co-ordinated strategic approach to development and infrastructure (as contained in the JSP), accessibility to the right types of services is likely to decline in the future. Services and infrastructure could fall behind population growth, leading to communities without the required infrastructure and services.</p>
<p><b>Housing</b> particularly in the urban areas of Bath and Bristol is becoming increasingly unaffordable. Population growth has increased housing demand within these urban areas which also have limited land supply. In the rural areas there is a lack of planned provision, mix and type of homes. Parts of the plan area have historically not provided the required level of affordable housing.</p>	<p>Without a co-ordinated strategic approach to development and infrastructure (as contained in the JSP), there is a likely risk of new housing development not being directed to areas where it is needed most or occurring in inappropriate locations. Without the JSP, the market led development approach is likely to result in inappropriate uses taking up the key sites, resulting in not meeting the West of England's housing objectives. However, each authority's Local Plan would still help to ensure housing and affordable housing was delivered.</p> <p>With the improvements in the Building Regulations the sustainability of new houses is likely to improve even in the absence of the JSP.</p>
<p>The plan area has experienced increasing levels of affluence as a whole, however</p>	<p>If not addressed through a co-ordinated strategic approach to development and infrastructure (as contained in the JSP),</p>

Key sustainability issue	Likely Evolution without the Plan (West of England JSP)
<p>identified <b>pockets of deprivation</b> remain persistent.</p>	<p>crime, deprivation and access to services are likely to remain problems within the more deprived areas.</p> <p>However, the patterns of deprivation within West of England are likely to follow existing trends and will respond to external pressures, not just the JSP.</p>
<p>The plan area when compared to the South West and national levels displays <b>economic activity</b> which is generally equivalent. There is a requirement to ensure that the level of economic growth over the plan period is maintained at a level which will provide employment opportunities to match the planned level of housing growth.</p>	<p>Without the JSP there could be a less co-ordinated approach to new employment and commercial infrastructure, leading to poor access to employment opportunities.</p> <p>Therefore, the pattern of skills levels and wages within the plan area is likely to remain the same, as is unemployment, without intervention through the JSP to improve skills levels and the diversity of employers in the area.</p>
<p>Each of the local authority areas within the plan area contain city, town and/or district centres which will face evolving pressures in terms of outside retail offers and the growing importance of e-retailing and provision of services online. There is a requirement to protect and enhance the <b>role of town centres</b> as economic drivers and employment supporters in a sustainable manner which is responsive to the evolving situation in the plan area.</p>	<p>Without a co-ordinated strategic approach to development and infrastructure (as contained in the JSP), inappropriately located development is likely to lead to restricted access to or an under supply of retail facilities.</p>
<p>There are a number of internationally, nationally and locally designated sites, important for habitats and species across the plan area, as well as legally protected and priority species and habitats of Principal Importance<sup>2</sup> in England. <b>Biodiversity</b> at these sites and beyond 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. The potential impacts on the European designated sites have been addressed through the West of England HRA.</p>	<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> <p>Lack of local protection could lead to potential degradation of valued habitats and nature conservation areas.</p> <p>Current numbers of European and National nature conservation sites with some small increases in the number of locally designated sites is likely to be maintained even without implementation of the JSP. However, not providing a co-ordinated strategic approach to development and infrastructure (as contained in the JSP) is likely to lead to inappropriate greenfield development, damaging the sub-region's green infrastructure and loss of valuable habitats and species. In addition, the HRA undertaken for the JSP has identified strategic mitigation measures such as a West of England Green Infrastructure Plan, which would not be achieved without the co-ordinated strategic approach</p>

<sup>2</sup> Under Section 41 of the Natural Environment and Rural Communities Act (2006).

Key sustainability issue	Likely Evolution without the Plan (West of England JSP)
	developed for the JSP.
<p>The plan area takes in a rich and varied landscape which includes the Mendip Hills AONB and Cotswolds AONB. There is a need to protect <b>landscape character</b> from threats relating to issues such as lack of appropriate management, inappropriate development and climate change.</p>	<p>Landscape character may be threatened by lack of appropriate management, inappropriate development and climate change.</p> <p>Without a co-ordinated strategic approach to development and infrastructure (as contained in the JSP), areas deemed to be of poor character will not be pro-actively improved, leading to a degradation in landscape and townscape quality.</p>
<p>The plan area contains numerous <b>heritage assets</b> some of which are on Historic England's Heritage at Risk Register. New development within the plan area may result in pressure on areas of significant built historic importance and aesthetic quality and there is a requirement for them to be preserved and enhanced.</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, it is certain that additional housing development is required, therefore, without a co-ordinated strategic approach to development and infrastructure (as contained in the JSP), inappropriately located or designed development is likely to pose a risk to heritage assets and therefore not improve the number of Conservation Areas, Scheduled Monuments and Listed Buildings on the Heritage at Risk Register.</p>
<p>The plan area has seen a decline in <b>carbon dioxide emissions</b> in recent years partly as a result of the local authorities' actions to curb those within their scope. The amount of energy generation from renewable technology in the plan area has also recently risen. Future development however has the potential to have adverse impacts if issues of climate change mitigation and adaption and delivering on aspirational energy efficiency targets are not addressed.</p>	<p>Planning policy is currently the only tool for the delivery of renewable energy technology in new development. The JSP can provide further support in the long-term approach to climate change mitigation and adaption and tasking Local Plans to set appropriate energy efficiency targets for new development. Without the JSP therefore, development may be less ambitious in its energy performance, and planning gains are less likely to be delivered in a timely and coordinated manner.</p>
<p>There are areas of <b>flood risk</b> through the plan area with large portions of North Somerset, Avonmouth and the Severnside area within Flood Zone 3. The inappropriate siting and design (without consideration for SuDS) of new development may aggravate this issue.</p>	<p>Climate change is expected to increase flood risk, due to rising sea levels and increased rainfall. Some aspects of flood risk are cumulative, as development can reduce permeable areas. The use of sustainable drainage systems (SuDS) is favoured as a way to minimise this risk, and is encouraged through Local Plan and JSP policies. Without a co-ordinated strategic approach to development and infrastructure (as supported by the catchment action plan based approach to water management in the sub region contained in the JSP), inappropriately located (e.g. within higher risk flood zones) and/or inappropriately designed development is likely to fail to make the most suitable provision for flood risk management infrastructure.</p>
<p>Much of the land in the plan area is identified as being Grade 3 <b>agricultural land</b>. At present there are gaps in data where Grade 3 land has been identified, and therefore it may be difficult to clearly distinguish between 3a and 3b land in the plan area. Future development in the</p>	<p>Without a co-ordinated strategic approach to development and infrastructure (as contained in the JSP), development within areas of higher grade agricultural land is likely to occur, damaging the sub-region's agricultural land supply.</p>

Key sustainability issue	Likely Evolution without the Plan (West of England JSP)
<p>sub-region as well as climate change may result in pressures on the viability and productivity of such soils.</p>	
<p>There are issues of congestion prevalent across much of the plan area, which as such suffers from poor internal <b>transport</b> links. While the use of more sustainable modes of transport has seen recent growth across much of the plan area, some rural areas are inaccessible to essential services and facilities and employment opportunities by more sustainable modes of transport.</p>	<p>Increased traffic would exacerbate all of the existing problems outlined in the baseline data.</p> <p>The JSP facilitates the implementation of transport mitigation required to enable the level of strategic growth needed. Without the JSP, traffic congestion and air quality are likely to remain the same or possibly worsen.</p>

## 4 Appraisal methodology

- 4.1 The reasonable alternative policy and Strategic Development Location options for the JSP have been appraised against the SA objectives in the SA framework (see **Table 2.2** earlier in this Non-Technical Summary), with scores being attributed to each option or policy to indicate its likely effects on each SA objective as shown in **Table 4.1** below.
- 4.2 Where a potential positive or negative effect is uncertain, a question mark was added to the relevant score (e.g. +? or -?) and the score has been colour coded as per the potential positive, negligible or negative effect (e.g. green, yellow, red, etc.).

**Table 4.1 Key to symbols and colour coding used in the SA of the West of England JSP**

Symbol	Effect
++	Significant positive effect (incapable of enhancement) likely
++/-	Mixed significant positive and minor negative effects likely
+ (includes +/?, ?/+, 0/+)	Minor positive effect (capable of enhancement) likely overall (includes minor positive effect mixed with uncertain or negligible effects)
+/-, ++/--, -/+	Mixed minor or significant effects likely
- (includes -/?, ?/-)	Minor negative effect (capable of mitigation) likely overall (includes minor negative effect mixed with uncertain effects)
--/+	Mixed significant negative and minor positive effects likely
-- (includes 0/--, -/--)	Significant negative (incapable of mitigation) effect likely (includes significant negative effect mixed with minor negative or negligible effects)
0, 0/?	Negligible effect likely or mixed with uncertainty
?	Likely effect uncertain

- 4.3 The likely effects of options and policies need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or policy on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.
- 4.4 The time frames that have been assumed throughout the SA of the JSP are as follows:
- Short term 0-5 years (2016-2021).
  - Medium term 5-10 years (2021-2026).
  - Long term 10-20 years (2026-2036).

- 4.5 '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. At the Strategic Development Locations, short-term effects are assumed to be neutral 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.
- 4.6 All effects are assumed to be permanent, at least for the lifetime of the development, unless there is evidence that they are temporary, e.g. during construction.
- 4.7 The SA findings for the JSP Policy and Strategic Development Location options are described in Chapter 4 of the Consolidated SA Report, and the findings for the final Vision, Strategic Priorities, Policies and Strategic Development Locations are presented in Chapter 5 of the Consolidated SA Report.
- 4.8 Cumulative effects refer to the potential to increase overall effects as a result of one effect being added to another. The likely cumulative effects of the JSP policies are described in Chapter 5 of the Consolidated SA Report and further ahead in this Non-Technical Summary.

## Assumptions applied during the SA

- 4.9 SA inevitably relies on an element of judgement. However, in order to ensure consistency in the appraisal, the SA framework that was set out in the final Scoping Report (November 2015) included a set of 'effect criteria' in relation to each SA objective. These criteria set out the circumstances in which positive or negative scores would be applied and were based on factors such as distances to services, features and sensitive receptors. The 'precautionary principle' has also been applied when making judgments about the potential significance of effects arising from JSP policies. The effect criteria are presented in Appendix 4 of the Consolidated SA Report for reference.

## 5 Consideration of reasonable alternatives for the JSP

- 5.1 Reasonable alternatives have been considered for the following elements of the JSP:
- Quantum of housing and employment development (Policies 1 and 4).
  - The Spatial Strategy (Policy 2) and the components of supply (i.e. the development typologies which form part of the spatial strategy: Existing Commitments, Urban Living, Small Windfalls, Non-Strategic Growth).
  - Affordable Housing (Policy 3)
  - Strategic Employment Locations (Policy 4).
  - Place Shaping Principles (Policy 5).
  - Strategic Infrastructure Requirements (Policy 6).
  - Strategic Development Locations (i.e. the 12 SDLs included in Policy 7).

### Quantum of housing and employment reasonable alternatives (Policies 1 and 4)

#### **Quantum of housing and employment: Reasons for selecting the alternatives dealt with Issues and Options**

- 5.2 At the Issues and Options stage (November 2015), and Towards the Emerging Spatial Strategy stage (November 2016), taking an evidence-based approach through the work on the Strategic Housing Market Assessments was put forward and no alternatives were identified for the quantum of housing to be delivered. In terms of the employment quantum, Topic Paper 3 (SD 15A) set out the evidence for the employment needs of the sub-region and how the employment land capacity was considered in the preparation of the JSP. The employment figure stemmed from the Local Enterprise Partnership (LEP) Jobs target which was underpinned by Oxford Economics growth forecasts. Other economic forecasts were considered but Topic Paper 3 concluded that the Oxford Economic forecasts were the most representative of what can be achieved in the West of England, and that the other forecasts were not reasonable alternatives.
- 5.3 A number of alternative higher housing figures were proposed by other parties during the Issues and Options consultation. The Unitary Authorities considered these in the West of England Housing Target Paper 2016 prepared by Opinion Research Services (ORS) (SD 14P, paragraphs 17-19) but their findings confirmed that due to assumptions used, underlying data quality, or being based on future economic growth rather than demographic growth as advised by national planning guidance, they were not considered to be reasonable alternatives. In addition, the Unitary Authorities considered higher housing figures to see if they would help deliver the affordable housing requirement. The same Housing Target Paper 2016 (SD 14P) at paragraphs 57-62 concluded that further increases in the housing requirement should not be applied as this could enable more households to form independently, which could lead to more people moving to the area – affecting the balance between jobs and workers.
- 5.4 Representations made on the Publication version of the JSP continued to argue that higher housing and employment figures should be planned for (132,000 homes and 105,000 jobs submitted by Business West<sup>3</sup> and 140,000 homes and 115,200 jobs submitted by Barton

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<sup>3</sup> Representation number 13865313/2.

Willmore<sup>4</sup>). In addition, for comparison, and mindful of the updated national standard methodology for assessing housing need published in July 2018<sup>5</sup> the unitary authorities decided to also appraise a slightly higher quantum figure than in the Publication JSP (approximately 110,000), which reflected the standard methodology.

5.5 Therefore, the following reasonable alternative housing and employment quantum options have been appraised in the SA:

- **JSP:** ~105,000 total dwellings and ~82,500 jobs.
- **Alternative option 1:** 'Medium high' scenario - ~110,000 total dwellings and ~85,000 jobs.
- **Alternative option 2:** 'High' scenario reflecting Business West (Bramley) - ~132,000 total dwellings and ~105,000 jobs.
- **Alternative option 3:** 'Very high' scenario - reflecting Barton Willmore - ~140,000 total dwellings and 115,200 jobs.

5.6 Table 4.1 in the Consolidated SA Report presents the reasonable alternative housing quantum options, and shows how the additional housing might be distributed across the JSP area under each option. It also shows the indicative job numbers for each development location under the four housing quantum options.

### Quantum of housing and employment: Summary of SA findings for the reasonable alternative quantum options

5.7 The detailed SA findings for the reasonable alternative higher quantum options are presented in **Appendix 6** of the Consolidated SA Report, and summarised in **Table 5.1** below. The SA findings for final housing and employment figures included in the Publication version of the JSP, i.e. Policies 1 (The Housing Requirement) and 4 (The Employment Land Requirement) are summarised further ahead in this Non-Technical Summary.

5.8 In general, the two highest growth options are likely to have more negative and significant negative effects than the JSP and Alternative Option 1 due to the larger areas of greenfield land that would be needed to deliver the higher growth. In addition, higher levels of car use are likely to occur as more locations with limited sustainable transport links would be developed. While the JSP and Alternative Option 1 would not achieve the significant positive effects for affordable housing and employment objectives that the higher growth options would achieve, they are likely to have more wholly positive effects (i.e. not combined with a negative effect) overall.

### Quantum of housing and employment: Reasons for selecting the preferred alternatives and discounting other options

5.9 The evidence-based approach taken to identifying the housing and employment requirement for the JSP is based on the 2012 NPPF and accompanying Planning Practice Guidance available when the JSP was submitted and is considered by the Unitary Authorities to be robust. The figures have been compared with higher quantum options that reflect the use of the government's 2018 standard methodology for assessing housing need, as well as representors' forecasts of housing and employment growth. Many more strategic development locations would be needed under the two highest growth scenarios than under the Publication JSP. Development of more greenfield land across the JSP area will inevitably result in more likely significant effects on a wider number of sensitive receptors and have the potential for more cumulative effects to occur. In addition, the research undertaken for the Unitary Authorities by ORS, concluded that the two highest growth scenarios were not robust due to assumptions used, underlying data quality, or being based on future economic growth rather than demographic growth as advised by national planning guidance.

<sup>4</sup> Representation number 15796321/7.

<sup>5</sup> Published alongside the Revised NPPF in July 2018 (see Paragraph: 004 Reference ID: 2a-004-20180913 of the PPG).

## Spatial Strategy reasonable alternatives (Policy 2)

### Spatial Strategy: Reasons for selecting the alternatives dealt with

- 5.10 At the Issues and Options stage (November 2015), the JSP Issues and Options document (SD 1C) explains that the process of developing the spatial strategy involved identifying a wide range of locations where new strategic development could take place and then considering how different locational options might be combined into spatial scenarios. The spatial scenarios identified were for distributing the housing provision at Strategic Development Locations, and not the provision already included in the other components of housing supply, i.e. existing commitments, urban living and/or non-strategic growth. For these three components, as set out in the West of England Unitary Authorities' response to the Inspector (WoE 01) there were not considered to be reasonable alternatives for the following reasons:
- In relation to existing commitments, it would not be a reasonable option to consider alternatives to extant plans which have been subject of SA to get to adoption.
  - Urban Living entails maximising previously developed land which is a priority in the NPPF and the Councils did not consider that there was any real reasonable alternative to this approach.
  - Non-strategic growth relates to smaller scale growth yet to be identified in future Local Plans and will be appraised through the Local Plan process.
- 5.11 As a starting point for discussion through the Issues and Options consultation, five theoretical spatial scenarios were identified to assess different approaches of achieving the vision and spatial objectives (see Scenarios 1 to 5 in the green box below). The five scenarios considered different degrees of concentration versus dispersal, alongside the means of movement around the sub-region. In theory, there could be numerous degrees of concentration or dispersal. The five scenarios selected for assessment were sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons could be made.
- 5.12 At the Towards the Emerging Spatial Strategy stage (November 2016) the consultation document (SD 1B) put forward a proposed spatial strategy in Table 1, which was informed by the emerging spatial priorities for the JSP, the transport assessments, Green Belt assessment and Sustainability Appraisal, plus the responses to the consultations and other evidence (e.g. Habitats Regulations Assessment and Strategic Flood Risk Assessment). The strategy was considered to be a balanced approach to ensuring growth closest to the central areas and other parts of urban areas where people seek to travel for work, shopping and recreational needs, rebalancing economic growth, maintaining and enhancing the environment and retaining the overall function of the Green Belt. It included nine Strategic Development Locations at: Nailsea/Backwell, M5 to A38 Transport Corridor (including Banwell and Churchill), Thornbury, Charfield, Buckover Garden Village, South East Bristol Whitchurch, Yate strategic corridor (Yate/Chipping Sodbury), North and East Keynsham, and Coalpit Heath.
- 5.13 In the Publication version of the JSP (November 2017) Policy 2 sets out the spatial strategy which includes the same nine locations identified in the Towards the Emerging Spatial Strategy consultation document, except that Backwell, Banwell, Churchill and Nailsea are separate SDLs, and there is a new SDL: Land at Bath Road, Brislington. The spatial strategy was again informed by the spatial priorities for the JSP, the transport assessments, Green Belt assessment and Sustainability Appraisal, plus the responses to the consultations and other evidence.
- 5.14 Therefore, the following reasonable alternative Spatial Strategy options have been appraised in the SA:

Five spatial scenarios identified at the **Issues and Options** stage<sup>6</sup>:

- **Scenario 1: Protection of the Green Belt** - included those possible strategic locations that were not in the Green Belt.
- **Scenario 2: Concentration at Bristol urban area** - focussed as much growth as possible within and adjacent to the Bristol urban area (particularly at the strategic corridors into the city) and specifically excludes strategic locations located elsewhere across the sub-region.
- **Scenario 3: Transport focussed** - gave priority to urban areas that already have good travel choices, then locations closer to central Bristol with a focus on development in south Bristol will help bring housing and future employment together, then the third priority was to allow development at locations that have good rail links into the central areas.
- **Scenario 4: More even spread of development** - explores the benefits of either a more even spread of growth across the plan area using a mix of different typologies and/or more bespoke solutions to address local objectives or infrastructure deficits. This could include a mix of urban extensions, town expansions or development at other settlements with perhaps different approaches in different unitary authority areas to reflect community aspirations
- **Scenario 5: New settlements** – (or a limited number of expanded settlements) this scenario considered opportunities to concentrate development into a single or small number of new strategic locations which would then complement the overall functioning of the plan area. This could include new settlements which could develop over the plan period and beyond, or the expansion of existing settlements.

One spatial scenario identified at the **Towards the Emerging Spatial Strategy** stage:

- **Emerging Spatial Strategy:** a spatial strategy was presented in Table 1 of the November 2016 JSP, which included nine SDLs for growth in addition to existing commitments, urban living, small windfall sites and non-strategic growth. The strategy was considered to be a balanced approach to ensuring growth closest to the central areas and other parts of urban areas where people seek to travel for work, shopping and recreational needs, rebalancing economic growth, maintaining and enhancing the environment and retaining the overall function of the Green Belt.

One spatial scenario identified at the **Publication** stage:

- **JSP submission** – ~61,500 existing commitments in Local Plans, ~17,600 to 12 SDLs ~16,200 urban living, ~6,800 small windfall sites and ~3,400 non-strategic growth.

Three alternatives to the JSP Spatial Strategy in Policy 2 have also been identified in relation to the urban living and non-strategic growth components of supply:

- **Alternative 1: Higher urban living** – the amount of dwellings to be provided through urban living is increased by 1,500, and 500 dwellings from one of the SDLs in each of B&NES, NSC and SGC have been deleted.
- **Alternative 2: Higher non-strategic growth** – around 3,500 fewer dwellings would be delivered through urban living, instead being delivered in all of the contingency locations referred to in the supporting text to Policy 2 (including the non-strategic growth contingency in B&NES and SGC). This option also assumes replacing homes in Bristol urban area with jobs.
- **Alternative 3: Lower urban living** – around 1,500 more dwellings would be provided through non-strategic growth at B&NES, SGC and NSC, while 500 dwellings from one of the SDLs in each of B&NES, NSC and SGC have been deleted.

5.15 Table 4.3 and Table 4.4 in the Consolidated SA Report present the numbers of dwellings to be delivered at the different locations identified in the JSP under the different spatial strategy alternatives described above.

<sup>6</sup> As part of the Consolidated SA Report, the work on the consideration of the five Issues and Options spatial scenarios has been revisited and updated to reflect the current known situation regarding capacity at the strategic locations identified as contributing to the spatial strategy under each scenario.

## **Spatial Strategy: Summary of SA findings for the reasonable alternative spatial strategy options**

- 5.16 The detailed SA findings for the reasonable alternative spatial strategy options are presented in **Appendix 6** of the Consolidated SA Report, and summarised in **Table 5.2**, **Table 5.3** and **Table 5.4** below. The SA findings for the final spatial strategy included in the Publication version of the JSP, i.e. Policy 2 (The Spatial Strategy) are summarised further ahead in this Non-Technical Summary.

### *Issues and Options – five spatial scenarios*

- 5.17 As shown in **Table 5.2**, Scenario 4: Even spread of development and Scenario 5: New settlements are likely to have more negative and significant negative effects than the other three scenarios. Scenario 4 would have the most significant negative effects due to distributing the development more widely across the plan area, in locations that are not well related to existing services, facilities, and employment opportunities and potentially having more impacts on a wider range of sensitive environmental receptors (e.g. Mendip Hills/Cotswolds AONBs, heritage assets, biodiversity designations) and flood risk areas. In addition, higher levels of car use are likely to occur as more locations with limited sustainable transport links would be developed. Conversely, while Scenario 5 would concentrate a large portion of new development at three locations for new settlements as well as at a number of urban extensions at unknown locations, it is still likely to have more negative effects as the location of new settlements are less likely to be well connected to existing services, facilities and employment opportunities, therefore there may be high levels of car use. In addition, the large areas of greenfield land that would be needed could have negative effects on a number of the environmental objectives. Scenario 2: Concentration at Bristol urban area and Scenario 3: Transport focussed are likely to have the most positive effects because they include strategic development locations that are well related to Bristol and the larger settlements in the plan area and/or sustainable transport links. Therefore, there would be better access to a range of existing services, facilities and employment opportunities that would reduce the need to travel by car. Although Scenario 1: Protection of the Green Belt does not have as many significant positive or negative effects as the other scenarios, it is likely to have a mixed minor positive and minor negative effect overall and therefore lies in the middle of the five scenarios in sustainability terms.

### *Towards the Emerging Spatial Strategy spatial scenario*

- 5.18 As shown in **Table 5.3** the TESS spatial strategy would have mostly minor positive effects on the social and economic SA objectives with a significant positive effect expected in relation to provision of housing. This is because it makes sufficient provision to meet the housing requirements of the plan area over the plan period, including a high proportion of the affordable housing need, and directs development to areas which currently fall within the more deprived of the plan area and in England. In addition, growth at the SDLs identified would provide reasonably good access to employment opportunities within existing urban areas as well as the major employment areas. However, the large areas of greenfield land that would be needed could have negative effects on a number of the environmental objectives, due to proximity to biodiversity sites and sensitive landscape areas (including the Mendip Hills AONB). Furthermore some of these locations include areas of high grade agricultural land. The focus on urban areas would deliver growth in close proximity to a high number of heritage assets. As the TESS spatial strategy would deliver much of the growth at areas which are within the urban area or well related to this area opportunities for the re-use of previously developed land may result and therefore these negative effects may be combined with a minor positive effect. The TESS spatial strategy would also support the delivery of a small proportion of growth within areas of high flood risk. The area of impermeable surfaces in the plan area is also likely to be increased through the development of higher amounts of greenfield land. As such a minor negative effect is expected in relation to flooding.

### *Publication JSP – alternative distribution scenarios to the JSP Spatial Strategy*

- 5.19 As shown in **Table 5.4**, Alternative 1: higher urban living would have the most significant positive effects due mainly to the urban areas being more accessible to existing services, facilities and job opportunities as well as sustainable transport links. However, it would have slightly more significant negative effects than the JSP, in particular in relation to air quality and surface water flooding. This is due to new development potentially increasing car journeys within the AQMAs in

Bristol and Bath, and also being in areas at risk of surface water flooding, particularly within Bristol. Conversely, Alternative 3: lower urban living would be likely to have more significant negative effects and fewer significant positive effects, as it requires more development to occur on greenfield sites that are not well located in relation to the urban areas or sustainable transport links for access to services and facilities.

**Spatial Strategy: Reasons for selecting the preferred alternatives and discounting other options**

- 5.20 As set out in Topic Paper 2 (SD 7B), paragraph 3, the spatial strategy underpinning the JSP was informed and selected based on the assessments of the Issues and Options spatial scenarios and the individual potential development locations, and informed by the spatial priorities, the transport assessments, the Green Belt assessment and Sustainability Appraisal, the responses to the consultations and other evidence.

**Table 5.1: Summary of SA scores for the quantum options – Publication JSP and three higher growth alternative options**

**JSP:** ~105,000 total dwellings

**Alternative option 1:** 'Medium high' scenario - ~110,000 total dwellings

**Alternative option 2:** 'High' scenario reflecting Business West (Bramley) - ~132,000 total dwellings

**Alternative option 3:** 'Very high' scenario - reflecting Barton Willmore - ~140,000 total dwellings

JSP Policy	Theme 1: Health			Theme 2: Sustainable Communities						Theme 3: Economy		Theme 4: Environmental Quality								Theme 5: Resources		
	SA objectives																					
	1a	1b	1c	2a	2b	2c	2d	2e	2f	3a	3b	4a	4b	4c	4d	4e	4f	4g	4h	5a	5b	
JSP	+	+/-	+	++	+	+	+	+/- ?	+?	+	+/-	+/ --?	--	+/ --?	+/-	+/ --?	-	+/-	-	+/-	+?	
AO1	+	+/-	+	++	+	+	+	+/- ?	+?	+	+/-	+/ --?	--	--?	+/-	+/ --?	--	+/-	-	+/-	+?	
AO2	+/-	+/ --	+/-	++	++	+/-	+/-	+/-	+?	++ /-	+/-	--?	--	--?	+/ --	--?	--	+/ --	--	+/ --	+?	
AO3	+/-	+/ --	+/-	++	++	+/-	+/-	+/ --	+?	++ /-	+/ --	--?	--	--?	+/ --	--?	--	+/ --	--	+/ --	+/- ?	

**Table 5.2: Summary of SA scores for spatial scenarios presented at Issues and Options stage**

**Scenario 1:** Protection of the Green Belt

**Scenario 2:** Concentration at Bristol urban area

**Scenario 3:** Transport focussed

**Scenario 4:** More even spread of development

**Scenario 5:** New settlements

SA Objective	SA 1a	SA 1b	SA 1c	SA 2a	SA 2b	SA 2c	SA 2d	SA 2e	SA 2f	SA 3a	SA 3b	SA 4a	SA 4b	SA 4c	SA 4d	SA 4e	SA 4f	SA 4g	SA 4h	SA 5a	SA 5b
Scenario 1	+/-	+/-	+/-	++	+	+/-	+/-	+/-	+?	0	+/-	-?	--	+/- ?	++/ --?	++/ --?	-	-	-	+/-	+?
Scenario 2	+	+/-	++?	++	+	++?	++?	++	++?	0	++	--?	--	--?	--?	--?	-	--	0	+	+?
Scenario 3	+	+/-	+	++	+	+	+	+	+?	0	+/-	--?	--	--?	--?	-?	-	-	-	++	+?
Scenario 4	+/-	--	--	++	+	--	--	+/-	+?	0	--	--?	--	--?	--?	--?	-	--	-	--	-?
Scenario 5	+?	+/-	+/-?	++	+	+/-?	+/-?	+/-	+?	0	+/-?	-?	?	--?	--?	--?	-?	--?	?	+/-	+?

**Table 5.3: Summary of SA findings for the spatial strategy contained in Table 1 of the Towards the Emerging Spatial Strategy JSP**

SA Objective	SA 1a	SA 1b	SA 1c	SA 2a	SA 2b	SA 2c	SA 2d	SA 2e	SA 2f	SA 3a	SA 3b	SA 4a	SA 4b	SA 4c	SA 4d	SA 4e	SA 4f	SA 4g	SA 4h	SA 5a	SA 5b
TESS spatial strategy	+	+/-	+	++	+	+	+	+	+	0	+	+/- --?	--	+/- --?	+/-	+/- --?	-	+/-	-	+/-	+

**Table 5.4: Summary of SA scores for higher urban living, higher non-strategic growth and lower urban living alternatives**

**JSP submission**

**Alternative 1:** Higher urban living

**Alternative 2:** Higher non-strategic growth

**Alternative 3:** Lower urban living

SA Objective	SA 1a	SA 1b	SA 1c	SA 2a	SA 2b	SA 2c	SA 2d	SA 2e	SA 2f	SA 3a	SA 3b	SA 4a	SA 4b	SA 4c	SA 4d	SA 4e	SA 4f	SA 4g	SA 4h	SA 5a	SA 5b
JSP <sup>7</sup>	+	+/-	+	++	+	+	+	+/- ?	+	0	+/- ?	+/- -?	--	+/- -?	+/-	+/- -?	-	+/-	-	+/-	+
Alternative 1	+	+/- -	+	++	+/-	+	+	++/ -?	++	0	++/ -?	+/- -?	--	+/- -?	++/ -	+/- -?	-	+/- -	-	++/ -	+
Alternative 2	+/-	+/- -	+/-	++	+/-	+/-	+/-	+/-	+/- ?	0	+/-	+/- -?	--	+/- -?	+/-	++/ --?	-	+/-	-?	+/- -	+/- ?
Alternative 3	+/-	+/- -	+/-	++	+	+/-	+/-	+/- -	+/- ?	0	+/- -	+/- -?	--	--?	+/- -	--?	--?	+/-	-?	+/- -	+/- ?

<sup>7</sup> Note that the sustainability effect identified for SA objective 3a in relation to the JSP is different from that identified in Table 5.1 (appraisal of the JSP against the higher quantum scenarios) because the appraisal findings in Table 5.1 take into account the overall amount of employment provision that will be made under each scenario, whereas the appraisal in Table 5.4 did not take employment provision into account.

## Affordable Housing reasonable alternatives (Policy 3)

### Affordable Housing: Reasons for selecting the alternatives dealt with

- 5.21 No reasonable alternatives to the evidence-based target of 24,500 affordable homes identified in the submitted JSP have been identified during the preparation of the JSP for the reasons set out in Chapter 4 of the Consolidated SA Report. The figure in the JSP was arrived at following an assessment of likely delivery from the various JSP components of supply: existing commitments in Local Plans; the contribution from the SDLs; urban living and non-strategic growth components of the JSP; and a robust assessment of the opportunities to boost delivery with potential funding streams.

### Affordable Housing: Summary of SA Findings

- 5.22 As reasonable alternative options relating to affordable housing were not identified in the Issues and Options and Towards the Emerging Spatial Strategy JSP documents based on the evidence work undertaken regarding affordable housing targets and delivery, no SA work was required.
- 5.23 The SA findings for Policy 3: Affordable Housing in the Publication JSP can be found in **Chapter 5** of the Consolidated SA Report and summarised further ahead in this Non-Technical Summary.

### Affordable Housing: Reasons for selecting the preferred alternatives and discounting other options

- 5.24 The policy approach that has been taken forward in the JSP is based on a balance between the amount of affordable housing that the evidence shows is required, and the available interventions to achieve this. Topic Paper 6 (SD 14J) provides the key assumptions underpinning the target of 24,500 affordable homes.

## Strategic Employment Locations reasonable alternatives (Policy 4)

### Strategic Employment Locations: Reasons for selecting the alternatives dealt with

- 5.25 As discussed above, higher forecasts of economic growth have now been subject to SA within the overall quantum of development scenarios.
- 5.26 In terms of how to meet the identified quantum of economic growth within West of England, at an early stage in the JSP preparation, the four unitary authorities considered the following alternatives for employment development locations:
- More employment in South Bristol – this was rejected as a reasonable alternative due to the pressure for housing in this broad area.
  - More employment in SDLs – this was considered within the SA of the potential development locations (see the Strategic Development Locations section further ahead in this Non-Technical Summary), and also through the appraisal of the spatial strategy options presented above.
  - More employment in Northern Fringe of Bristol/South Gloucestershire – this was rejected as a reasonable alternative due to the potential to further the economic imbalance in the sub-region.
  - More or new greenfield business parks – this was rejected as a reasonable alternative, as it is not consistent with the spatial strategy and economic strategy of the Local Economic Partnership (which focus on the identified Enterprise Zones and Areas) and recognised the need to revitalise existing cities and towns.
- 5.27 The Economic Development Needs Assessment (summarised in Topic Paper 3, SD 15A) concluded that there was sufficient employment land at the strategic level of the West of England to meet the forecast demand. Therefore, a detailed consideration of alternative development locations for employment growth was not required.

- 5.28 The employment strategy as set out in Policy 4 of the Publication JSP sees strategic employment growth directed to the following existing locations:
- Existing city and strategic town centres.
  - Enterprise Zones and Areas.
  - Key Strategic infrastructure employment locations.

#### **Strategic Employment Locations: Summary of SA findings for the strategic employment locations reasonable alternatives**

- 5.29 The level of employment to be delivered in different SDLs has been considered within the SA of the potential development locations (further ahead in this Non-Technical Summary), and also through the appraisal of the spatial strategy options presented above.
- 5.30 The SA findings for Policy 4: Strategic Employment Locations in the Publication JSP can be found in **Chapter 5** of the Consolidated SA Report and summarised further ahead in this Non-Technical Summary.

#### **Strategic Employment Locations: Reasons for selecting the preferred alternatives and discounting other options**

- 5.31 Topic Paper 3 provides the evidence and justification for the use of the Oxford Economics forecast of employment growth, and the Economic Development Needs Assessment concluded that no additional employment land beyond that already identified within the Strategic Economic Plan and Local Plans was required. Therefore, the employment strategy set out in Policy 4 of the Publication JSP seeks to address the critical economic development issues for the sub-region by supporting continued employment uses at existing employment areas and strategic locations within the sub-region including town and city centres.

## Place Shaping Principles reasonable alternatives (Policy 5)

#### **Place Shaping Principles: Reasons for selecting the alternatives dealt with**

- 5.32 No alternative options relating to the place shaping principles were included in the Issues and Options document (November 2015) or the Towards the Emerging Spatial Strategy consultation (November 2016), as these stages were focussing on the overall spatial strategy, strategic development locations and strategic infrastructure requirements. However, throughout the JSP consultations there have been responses referring to 'place making requirements' and 'good quality design' being key issues to be addressed. In addition, the individual themes now included in Policy 5 e.g. climate change mitigation and health and wellbeing, have been referenced multiple times. Policy 5 in the Publication JSP therefore brings together the consideration of representations made and how all these themes can be dealt with through good quality place making principles for the SDLs.

#### **Place Shaping Principles: Summary of SA findings for the place shaping principles reasonable alternatives**

- 5.33 The SA findings for Policy 5: Place Shaping Principles in the Publication JSP can be found in **Chapter 5** of the Consolidated SA Report and summarised further ahead in this Non-Technical Summary.

#### **Place Shaping Principles: Reasons for selecting the preferred alternatives and discounting other options**

- 5.34 Initial work on the concepts of SDLs through the Strategic Development Location Template documents and concept diagrams (SD 11A) helped the UAs to understand the principles of good design, which informed Policy 5. In bringing forward the 12 SDLs and urban living components it was important to include an appropriate strategic framework for quality and sustainable communities. Unitary Authority Members were keen to have a plan that was not solely focused on delivering housing numbers but also on delivering place and quality. Therefore, Policy 5

helped to show how the JSP would address the core principles of achieving sustainable development in the 2012 NPPF but in addition, demonstrated ambition; for example, the concept of the strategic GI plan was to show how the West of England authorities would not just maintain but enhance their environment.

## Strategic Infrastructure Requirements reasonable alternatives (Policy 6)

### **Strategic Infrastructure Requirements: Reasons for selecting the alternatives dealt with *Non-Transport Strategic Infrastructure***

- 5.35 In the Publication version of the JSP (November 2017) Policy 6 refers to future investment in strategic flood management infrastructure at Avonmouth/Severnside, and on the River Avon in relation to Bristol City Centre, as well as a Green Infrastructure Plan that will identify the strategic measures and mechanisms to support the delivery of the environmental ambitions of the JSP and Local Plans, including mitigation for protected sites. No alternatives were identified earlier in the JSP preparation.

### *Transport Strategic Infrastructure*

- 5.36 No alternative options for transport infrastructure were specifically identified within the JSP Issues and Options consultation document (November 2015), but Spatial Objective 6 was to "Focus new housing and employment which facilitate public transport and active travel methods and limit substantial new housing and employment in locations which would exacerbate unsustainable travel patterns."
- 5.37 The detail regarding transport infrastructure identified within the JSP has been presented within the Transport Topic Papers at each stage and the Joint Transport Study (JTS). The JTS undertook a comprehensive review of the transport needs of the West of England, which responded to current challenges, planned growth through the current Local Plans, and the additional growth being considered through the JSP. The JTS identified transport interventions to address current challenges and planned growth, and then identified specific interventions to mitigate the effects of different spatial options considered for the JSP at the Towards the Emerging Spatial Strategy and Publication stages. The JSP only includes the transport interventions required to mitigate the impacts of the JSP spatial strategy. Other interventions identified in the JTS are not included in the JSP.
- 5.38 The Issues and Options Transport Topic Paper (November 2015 - SD 16E) did not identify specific options for strategic transport infrastructure, rather it assessed the potential strategic development locations listed in the JSP Issues and Options document in relation to quality of travel choices available and the local and strategic scale of traffic congestion. This assessment was then used to help define the 'transport-focussed' spatial distribution scenario by sifting out locations with low levels of travel choices, taking into account the congestion impacts at remaining locations and then focusing on locations assessed to perform better in terms of access to sustainable travel choices and likely congestion impacts.
- 5.39 In the Towards the Emerging Spatial Strategy JSP in November 2016, it was stated that in order to support the additional development required as a result of the spatial strategy, the approach to infrastructure provision seeks to:
- maximise the effectiveness of sustainable travel choices and encourage mode shift (to rail, MetroBus, Park & Ride, bus, cycling, walking);
  - maximise the effectiveness of non-car mode choices for both urban living and new development outside existing urban areas; then,
  - mitigate impacts of additional traffic, including investigation of junction capacity improvements, upgrades, new highway connections and traffic restrictions.
- 5.40 The transport evidence was used to inform the development of the emerging spatial strategy, along with the other factors discussed earlier in this chapter under the Policy 2 – Spatial Strategy

heading. Different spatial scenarios were tested to identify their transport impacts, from which a range of transport measures were identified to enhance travel choices and mitigate the impacts.

- 5.41 The Joint Transport Study Final Report (October 2017 – SD 16B) described the recommended package of strategic infrastructure to meet the future connectivity needs of the West of England. This considered the feedback from consultation on the draft Vision (SD 16B) and incorporated further modelling and assessment of schemes. This took into account both existing challenges and planned growth and the impacts of the JSP.
- 5.42 The report provided a commentary on the reasons for including or excluding schemes, and described the economic, social and environmental impacts. Appendix A of the Report provided assessments of key schemes, against the criteria developed for the Key Principles Report (SD 16F). This includes those schemes identified as strategic transport infrastructure for the JSP.
- 5.43 Therefore, the following reasonable alternative Strategic Infrastructure options have been appraised in the SA:

**A package of transport measures relating to the Towards Emerging Spatial Strategy stage** was presented in the Transport Topic Paper (November 2016 - SD 16C), and in terms of improving sustainable travel choices included:

- Strategic cycle corridors on key corridors into the Bristol urban area.
- Expansion of the MetroBus network.
- Additional bus service improvements.
- A ring of new Park & Ride sites around the Bristol urban area.
- Rail improvements including a relocated Keynsham rail station, a new station at Charfield, longer rolling stock and longer platforms at Weston-super-Mare, Nailsea & Backwell and Yate.

In addition, highways improvements would also be required:

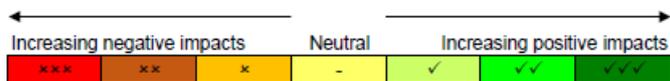
- Improvements to M5 Junctions 14, 16, 20 and 21.
- A new M5 Junction 21A, together with a bypass for Banwell and Churchill on the A371/A368 corridor, with links into these strategic locations, and upgrades to the A38 corridor, including improvements to address capacity constraints in the vicinity of the Airport.
- A new road link from M5 Junction 20 to the A370 in the Nailsea and Backwell area.
- Winterbourne and Frampton Cotterell Bypass.
- Callington Road Link (connecting from A4320 St Philips Causeway to A4174 Callington Road).
- A new highway link from the A4 at Hicks Gate roundabout to the A37.
- Avon Mill Lane-A4 link in Keynsham.
- A new distributor road, at Whitchurch (to the east of the A37), providing access into the area, but which would also provide traffic relief for Whitchurch village.
- A package of junction improvements on key corridors between the strategic locations and key destinations, for example the A38, A432 and A370.

The **proposed transport mitigation package contained in the Publication JSP** (as set out on the JSP Key Diagram and listed in the policy requirements of Policies 7.1 to 7.12 (see Table 4.8 in the Consolidated SA Report).

### **Transport Infrastructure: Summary of SA findings**

- 5.44 The November 2015 SA Report (SD 9K) did not include appraisal of any transport options as they had not been identified at that stage.
- 5.45 The November 2016 SA Report (SD 9F-I) appraised all of the potential strategic development locations (including the preferred locations proposed in the Emerging Spatial Strategy) but did not explicitly refer to the potential transport mitigation package set out in the November 2016 Transport Topic Paper (SD 16C).

5.46 The JTS Final Report (SD 16B – Appendix A) included a strategic assessment of the schemes in the November 2016 proposed transport strategy. This included schemes proposed as strategic infrastructure to support the delivery of the JSP. The strategic assessment considered a number of criteria within the Economic Case for each scheme, which equate to a number of the SA objectives, and cover the SEA topics listed in Schedule 2 of the SEA Regulations (see **Table 2.1** in this report). A seven point scale from very positive to very negative was used to assess each of the schemes against each of the Economic Case criteria, as shown below:



5.47

5.48 Therefore, it was possible to identify the likely significant effects in relation to the SA objectives for the JSP from the strategic assessment table in Appendix A of the JTS Final Report (SD 16B). The transport mitigation schemes relating to cycling, bus, MetroBus and Mass Transit are likely to have a number of minor to moderate positive effects on almost all of the SA objectives, as they would contribute to unlocking jobs and housing growth, improve access to job opportunities and services and facilities, and encourage active and healthy travel. However, those SA objectives relating to the natural environment (i.e. SA objectives 4b-4h: **biodiversity, landscape, re-use of previously developed land, flooding and water quality**) are identified as having minor to moderate negative effects. These were identified particularly in relation to the MetroBus schemes, e.g. the Nailsea/Clevedon/Bristol City Centre route could lie within or near to Priority Habitats, Flood Zones 2 & 3 and an AQMA. Similarly, the Orbital MetroBus lies within SSSI, Ancient Woodland, Priority Habitats, Flood Zones 2 - 3 and AQMA. South of Hicks Gate, the Orbital MetroBus would follow the line of the South Bristol Orbital Corridor (Road 5): this would have impacts on landscape and other aspects of the natural environment.

5.49 For the transport schemes related to Park & Ride, rail and highways improvements, there are more neutral (negligible) effects, along with some positive effects, two of which are significant, in relation to the South Bristol Orbital Corridor and M5 Junction 21A to A38 Corridor. These relate to SA objectives 2a: **housing** and 3a: **employment**. By contrast, that same M5 to A38 scheme along with the Nailsea Corridor were identified as having potentially significant negative effects on the natural environment (i.e. SA objectives 4b-4h), due to impacts on Priority Habitats and Flood Zones 2 & 3.

5.50 The SA findings for Policy 6, including the specific transport measures shown on the Key Diagram can be found in **Chapter 5** of the Consolidated SA report and summarised further ahead in this Non-Technical Summary.

### Non-Transport Strategic Infrastructure: Summary of SA findings

5.51 The SA findings for Policy 6, including the flood management and Green Infrastructure Plan, can be found in **Chapter 5** of the Consolidated SA report and summarised further ahead in this Non-Technical Summary.

### Transport Infrastructure: Reasons for selecting the preferred alternatives and discounting other options

5.52 The November 2016 Transport Topic Paper concluded that the Emerging Spatial Strategy has strengths and weaknesses in transport terms. The strategic locations closer to the urban area are, in general, easier to serve with good quality public transport options. The urban extensions at Whitchurch and Keynsham will reduce travel distances but improvements to travel choices will be needed. However, many of the areas located beyond the Green Belt have relatively poor travel choices and therefore pose challenges in improving travel choices and mitigation of their impacts. Development in Nailsea and Backwell, Banwell and Churchill, Coalpit Heath, Buckover, Charfield, Yate and Thornbury will increase travel distances and improvements will be required to travel choices from these locations. Banwell and Churchill are particularly problematic in transport terms, but the proposed infrastructure will enable improvements to conventional bus and MetroBus feeder services to be considered. The Topic Paper acknowledged that there is limited information about the locations for urban living but stated that the preferable approach in transport terms would be to locate high-intensity development in places with good access by public transport, walking and cycling to jobs and local services. This would provide the

opportunity for car-free development and high-quality place-making. Finally, it recognised that other planning policy considerations would need to be taken into account in the development of the Emerging Spatial Strategy. As noted in the Introduction to the Transport Topic Paper, the wider Joint Transport Study informed, and was informed by, the JSP as it provided evidence on current and future transport issues to inform the assessment of potential strategic locations for future development.

## Strategic Development Locations reasonable alternatives (Policy 7)

### Strategic Development Locations: Reasons for selecting the alternatives dealt with

- 5.53 A number of reasonable alternative strategic locations identified at the Issues and Options stage were listed in Table 5.1 and shown in Figure 9 of the Issues and Options JSP (SD1C), (the locations are also listed in **Appendix 5** of the Consolidated SA Report, which summarises the reasons for subsequent selection or rejection as a strategic development location). At this stage in the JSP preparation, the intention was to consider all potential options equally, with no dwelling capacities identified. However, based on environmental assessments, urban extension options at Bath, where evidence shows development would have an adverse impact on heritage and landscape assets (specifically the World Heritage Site and the Cotswolds AONB) were excluded as possible strategic locations.
- 5.54 At the Towards the Emerging Spatial Strategy stage, 37 locations were identified in Table 2 of the 'Assessment of strategic development locations beyond settlement boundaries methodology paper' document (SD 11D), comprising 116 Assessment Areas (the 37 locations are also listed in **Appendix 5** of the Consolidated SA Report). Following assessment of the suitability of the locations by considering a range of information including: Call for Sites, national and local designations, physical constraints and other considerations such as archaeology/heritage, ecology, landscape and transport, nine<sup>8</sup> preferred strategic development locations were presented in Table 1 of the Towards the Emerging Spatial Strategy consultation document (SD1B).
- 5.55 Twelve Strategic Development Locations were then included in the Publication JSP, and referred to in Policies 2 and 7. They included the same nine locations identified in the Towards the Emerging Spatial Strategy consultation document, except that Backwell, Banwell, Churchill and Nailsea were now separate SDLs, plus a new SDL: Land at Bath Road, Brislington. As set out in **Appendix 5** to the Consolidated SA Report, this SDL replaced the earlier 'SE Bristol Hicks Gate' SDL that was rejected at the Towards the Emerging Spatial Strategy stage. It was reintroduced in a different form after further investigation, including relocation of the existing park and ride (P&R) site. These changed circumstances allowed for a more positive development opportunity that was considered able to minimise the negative effect on the landscape previously identified through the SA.

### Strategic Development Locations: Summary of SA findings

#### *Issues and Options*

- 5.56 Table 4.9 in the Consolidated SA Report presents the SA effects identified for all of the potential strategic locations considered at the Issues and Options stage, and the likely significant effects are summarised below.
- 5.57 No effects were identified in the short term for all locations and typologies, except the urban intensification typology, as this is where development is more likely to come forward initially. In the medium to long term, mostly minor or uncertain effects were predicted for all of the locations as not enough was known about the scale of development likely to take place, or the direction of growth at each of the locations at this stage in the plan process. However, significant positive effects were considered likely for some of the SA objectives as follows:
- 2a: **quantum of high quality housing** (for all locations) due to the contribution development at all locations would make to meeting the housing requirement for the West of England.

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<sup>8</sup> Nailsea and Backwell were combined in Table 1, as were Banwell and Churchill (listed as "M5 to A38 Corridor").

- 2b: **mix of high quality housing** (for all locations except the urban intensification and dispersed typologies, and Bristol Airport because it was only being considered for employment) due to the potential for development within urban extensions, town expansions and other settlements to provide a mix of housing. Development within the urban areas is less likely to be able to provide new detached houses with gardens due to lack of space and also lower viability on brownfield sites may reduce opportunities for affordable housing. The effects for the dispersed typology were uncertain as the specific locations of development within each Unitary Authority were not identified.
- 2d: **access to educational facilities** (Winterbourne, Frampton, Coalpit Heath, Backwell, Churchill, and Pill) due to the existing provision of primary and secondary schools with future places available in these locations.
- 3b: **access to major employment areas** (Avonmouth/Sevenside and Bristol Airport) as they are both major employment sites/areas. Avonmouth/Sevenside is also an identified Enterprise Area and there is potential to access employment opportunities within the north fringe of Bristol.
- 4e: **loss of agricultural land** (for the urban extension locations Weston-super-Mare and Whitchurch) as there is limited or no potential for loss of high grade agricultural land. There are concentrated areas of high grade agricultural land around Weston-super-Mare but it was considered likely that these areas could be excluded from the development area.
- 5a: **access to sustainable transport** (for four of the urban extension sites – Weston-super-Mare, South West Bristol, East of Bridgegate / Oldland and East of Kingswood / Warmley) because they are all in proximity to a range of sustainable transport options and it is likely that the strategic level of development will provide appropriate on-site sustainable transport provision, and that this would increase in the longer term as additional infrastructure is funded and delivered.

5.58 Only a few significant negatives were considered likely in relation to SA objectives:

- 4e: **loss of agricultural land** (for all of the town expansion locations and the 'other settlement' Pill) due to the potential for loss of high grade agricultural land around the towns and Pill.
- 4f: **tidal/fluvial flooding** (for town expansion at Clevedon only) because the area was almost entirely within fluvial and tidal Flood Zone 3 (highest flood risk) (note that the Environment Agency flood mapping has been updated and it is no longer all in 3b).

#### *Towards the Emerging Spatial Strategy*

- 5.59 Table 4.10 in the Consolidated SA Report presents a summary of the likely long term effects if the 36 Assessment Areas at the Towards the Emerging Spatial Strategy stage were to be developed as strategic locations. It was concluded that the short term effects in relation to each of the SA objectives for all Assessment Areas would be negligible given that it will take time for construction to start up due to the strategic scale of development to be delivered at each location. The medium to long term effects were expected to be broadly the same in relation to each SA objective for all locations considered.
- 5.60 A range of sustainability effects were identified for the individual Assessment Areas, with a large number of positive effects identified for many of the SA objectives. A summary of the significant positive and negative effects identified is provided below.
- 5.61 Significant positive effects were considered likely for SA objective 1a: **access to public open space** for those locations within walking distance of a number of public open spaces and/or public rights of way (PRoWs), such as Nailsea (NA1 and NA2). Most of the Assessment Areas were considered likely to have significant positive effects in relation to SA objectives 2a: **quantum of high quality housing** and 2b: **mix of high quality housing** because the scale of development to be delivered would make a significant contribution to the housing need in the plan area. However, three Assessment Areas (MNR2, PA1 and PA4) would have negligible effects because the topography at these locations is such that it would severely limit the development potential.
- 5.62 Some of the urban extension and town expansion Assessment Areas were found to have significant positive effects in relation to SA objectives 2d: **access to educational facilities** and

2e: **access to town centres** (e.g. Hicks Gate, Ashton Vale and Keynsham and Saltford) due to their proximity to larger settlements with more facilities. Conversely, some Assessment Areas at the other settlements/locations which are generally smaller, were considered to have likely significant negative effects in relation to these two SA objectives (e.g. Thornbury, Nailsea, Churchill).

- 5.63 Most of the Assessment Areas were considered likely to have generally positive effects for SA objective 3a: **quantum of employment floorspace/land and access to work opportunities** due to the contribution to employment opportunities that their development would provide, with many of the urban expansion and town expansion locations likely to have significant positive effects because of their proximity to urban areas with more employment opportunities. Only one Assessment Area at Long Ashton (LA2) was found likely to have a significant positive effect for SA objective 3b: **access to major employment areas** due to its proximity to Temple Quarter Enterprise Zone.
- 5.64 Some significant negative effects were considered likely in relation to SA objectives 4a: **historic environment** where Assessment Areas could adversely affect heritage assets or their character and setting. West of Bath abuts the World Heritage Site, and Thornbury, Olveston, Pucklechurch and Winterbourne, Frampton Cotterell and Coalpit Heath all contain Conservation Areas and listed buildings. Similarly, significant negative effects were identified for SA objective 4b: **habitats and species** for areas in close proximity to international or nationally designated nature conservation sites (i.e. West of Bath – close to Carrs Woodland SNCI and contains a geological SSSI, and Clevedon, Portishead and Severnside, which are adjacent to the Severn Estuary SAC/SPA/Ramsar site). Most of the Assessment Areas except some at Hicks Gate, Long Ashton and Severnside were expected to have significant negative effects in relation to SA objective 4c: **landscape** due to their potential to alter the character of sensitive landscape areas, and all of the Assessment Areas except Severnside are likely to have significant negative effects for SA objective 4d: **re-use of previously developed land** because they would involve the use of large greenfield sites.
- 5.65 A large number of the Assessment Areas would have a significant positive effect in relation to SA objective 4f: **tidal/fluvial flooding** because they are in areas of low flood risk (Flood Zone 1), and only Assessment Area NA2 at Nailsea was considered likely to have a significant negative effect because it is in Flood Zone 3. Only one Assessment Area (LG1 at Longwell Green) would have a significant positive effect in relation to SA objective 4g: **surface water flooding** because it is largely in a low risk area (less than 1 in 1,000 year return period), whereas YA3 at Yatton could have a significant negative effect because it is in an area with a high risk of surface water flooding (1 in 30 year return period).
- 5.66 The Longwell Green Assessment Area was the only one identified as likely to have a significant positive effect in relation to SA objective 5a: **sustainable transport** as it has good access to sustainable transport links (including a Park and Ride at Bath Road, Regional Route 16 of the Sustrans cycle network and Keynsham rail station which is in relatively close proximity). Conversely, Assessment Areas at seven locations (M4/M5, Midsomer Norton/Radstock, Nailsea, Paulton, Peasedown St. John, Temple Cloud/Clutton and Yatton) were considered likely to have significant negative effects due to their distance from sustainable transport links.

#### *Publication JSP*

- 5.67 The likely significant effects of the twelve Strategic Development Locations included in the Publication JSP are described in **Chapter 5** of the Consolidated SA Report and summarised in the next section of this Non-Technical Summary.

#### **Strategic Development Locations: Reasons for selecting the preferred alternatives and discounting other options**

- 5.68 **Appendix 5** of the Consolidated SA Report summarises the reasons for selecting the final 12 SDLs included in the Publication JSP, and the reasons for discounting the numerous potential alternative locations considered at the earlier stages. The reasons were based on the findings of the assessment of the Assessment Areas undertaken during production of the Towards the Emerging Spatial Strategy document, along with other technical assessments such as the SA, Habitats Regulations Assessment and Strategic Flood Risk Assessment.

## 6 Sustainability Appraisal findings for the Submitted West of England JSP

- 6.1 This section of the Non-Technical Summary presents a summary of the SA findings and in particular the likely significant effects for the Vision, Strategic Priorities, Policies and Strategic Development Locations within the West of England Publication JSP (as submitted in April 2018). Detailed findings for each component of the JSP are presented in SA matrices found in Appendix 7 of the Consolidated SA Report. **Table 6.1** below presents a summary of the predicted sustainability effects for the Vision, Strategic Priorities, Policies and Strategic Development Locations set out in the West of England Joint Spatial Plan, as submitted in April 2018.
- 6.2 In general, the JSP has been found to have a wide range of positive and significant positive effects on the SA Objectives, in particular in relation to provision of the required housing amount and a mix of housing types and tenures, as well as access to services and facilities, employment opportunities and sustainable transport links (in the longer term). The fact that the JSP directs a significant portion of new development to the larger urban areas will have a range of benefits in terms of directing development towards the settlements with the greatest range of jobs and service provision in the sub-region, and co-locating the majority of new residential and employment development, particularly through the delivery of new sustainable communities at the SDLs. It should also mean that there are good opportunities for people to make use of sustainable modes of transport, travelling over shorter distances, and will enable more people to access the jobs created.
- 6.3 However, a number of negative and significant negative effects have also been identified, mainly in relation to the provision for large-scale development at the 12 SDLs although many of these effects are uncertain, as the likelihood of and significance of these effects will depend very much on the exact location, scale and design of the mixed-use developments pursued at each SDL. In addition, many potential positive effects expected will depend on how well policy requirements from the Publication JSP and subsequent Local Plans are implemented.

**Table 6.1 Summary of SA findings for all elements of the JSP (Vision, Strategic Priorities, Policies and SDLs)**

JSP Policy	Theme 1: Health			Theme 2: Sustainable Communities						Theme 3: Economy		Theme 4: Environmental Quality								Theme 5: Resources	
	SA objectives																				
	1a	1b	1c	2a	2b	2c	2d	2e	2f	3a	3b	4a	4b	4c	4d	4e	4f	4g	4h	5a	5b
<b>Vision and Strategic Priorities</b>	++	0/?	++	++	++	++	++	++	++	++	++	++	++	++	?/+	?/+	+	+	?/+	++	++
<b>Policy 1</b>	0	0	0	++	+	0	0	0	0	0	0	0	0	0	--	-	-	-	0	0	0
<b>Policy 2</b>	+	+/-	+	++	+	+	+	+/?	+	+	++/-?	+/--?	--	+/--?	+/-	+/--?	-	+/-	-	+/?	+
<b>Policy 3</b>	0	0	0	+	++	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0
<b>Policy 4</b>	0	+/-	0	0	0	0	0	0	+	++	++	0	0	0	+	0	0	0	0	+	0
<b>Policy 5</b>	+	+	+	0	+	+	+	+	+	+	+	+	+	+	0	0	+	+	+	+	+
<b>Policy 6</b>	+	++/-	+	0	0	+	+	+	+	++	+	+/--?	+/--?	+/--?	-	-	+/-	+/-	+/-	++/-	+
<b>Policy 7.1</b>	+	-/?	+	++	++	+	++	+	0	++	+	?	-/?	--	--	?/-	+	+/-	0	++	?
<b>Policy 7.2</b>	+	?	++	++	++	+	++	+	0	+/?	+	?	-/?	--	--	?	++	-/+	0	++	?
<b>Policy 7.3</b>	+	?	+/?	++	++	+/?	++	+/?	0	+/?	+	?	-/?	?	-	?	+	+/-	0	++	?
<b>Policy 7.4</b>	+/?	+	+/?	++	++	+/?	++	-	0	+/?	++	0	+	0/--	--	--	++	+/-	?	++	?
<b>Policy 7.5</b>	+/?	+/?	+/?	++	++	+/?	++/--	-	0	+	+	?	?/-	--	--	?	++	+/-	?/-	+/-	?
<b>Policy 7.6</b>	++	+	+/?	++	++	+/?	++	--	0	+	+/-	++	-/?	--	--	?	++	+/-	0	+/?	?
<b>Policy 7.7</b>	+/?	+	+/?	++	++	+/?	++	+/-	0	+	++	0	0/?	--	--	--	++	+/-	?	++	?
<b>Policy 7.8</b>	+/?	+/?	+/?	++	++	+	+	-	0	+	-	?	?	--	--	--	++	+/-	0	++	+
<b>Policy 7.9</b>	++	+	+/?	++	++	+	++/-	-	0	+	-	?	?	--	--	-/?	+	+/-	0	++	?
<b>Policy 7.10</b>	+/?	+	+/?	++	++	+/?	+/-	-	0	+	++	?	0	-	--	+/?	++	+/-	0	++	?
<b>Policy 7.11</b>	+/?	+	+/?	++	++	-/?	+	+	0	++	++	?	?	--	--	--	+	+/-	0	++	?
<b>Policy 7.12</b>	+/?	+/?	+/?	++	++	+	+/-	+	0	++	++	-/?	?	-	--	?/+	+/-	+/-	0	++	?

## 7 Cumulative Effects and Monitoring

7.1 Given that a significant portion of the dwellings to be provided in the JSP to meet the housing need of West of England are already allocated within the Local Plan documents for each of the Unitary Authorities, it is necessary to consider the likely cumulative effects of the JSP in light of the major housing allocations within the following extant Local Plan documents:

- Bristol Core Strategy (2011) and Bristol Site Allocations and Development Management DPD (2014);
- Bath and North East Somerset Core Strategy (2014) and Bath and North East Somerset Placemaking Plan (2017);
- North Somerset Core Strategy (2012) and North Somerset Sites and Policies Plan Part 2: Site Allocations Plan (2018); and
- South Gloucestershire Core Strategy (2013) and South Gloucestershire Policies, Sites and Places Plan (2017).

7.2 Based on GIS data provided by the Unitary Authorities, and a review of the Policies Maps within each of the Local Plan documents, the spatial relationship between the Local Plan allocations and the Strategic Development Locations in the JSP is summarised below:

- Allocations in Bristol are spread throughout the urban area. Many of the larger sites within the Bristol urban area are located towards the settlement boundary with a high proportion to the south of Bristol. Sites to the south include the Novers Hill, Hengrove Park and Hawkfield Road in Hartcliffe which would provide approximately 440, 1,000 and 300 homes respectively. Sites in Brislington which would be in closest proximity to the Brislington SDL include land at Flowers Hill, Broom Hill and 801 Bath Road which would provide 100 homes, 300 homes and 15 homes respectively. There a number of sites to the north east including St Matthias Campus, Glenside Campus and Filwood Road at Fishponds, however only a limited number of sites have been allocated to the north and north west including three within Lawrence Weston.
- Allocations in Bath and North East Somerset are focussed mainly at Bath to the north and south including at Mulberry Park and former MoD Ensleigh and Royal High Playing Field. Larger sites towards the centre of the city include Roseberry Place which is to provide around 2,000 homes. Sites allocated at the periphery of Keynsham include the large site at Somerdale to the north of the town centre as well as further sites to the east and south west of the town. The site to the east of Keynsham which would deliver 220 – 250 dwellings as well as employment land south of the A4 in the plan period, is in close proximity to the North Keynsham SDL. Development at Somerdale would also be in close proximity to this SDL and would provide 700 dwellings as well as B1 office use. Furthermore, the land currently allocated at Whitchurch for 200 dwellings would be in close proximity to the Whitchurch SDL.
- Allocations within North Somerset are focussed mainly at the larger settlements of the Unitary Authority area including at Weston-super-Mare, Portishead, Yatton, Nailsea and Clevedon. Allocations to the south of the area including land at Says Lane and land at Bristol Road both of which are by Churchill, are close to the Churchill SDL. Land allocated for housing at East of Wolvershill Lane by Banwell is in close proximity to the Banwell SDL, while Parklands Village would be separated from this SDL by land around the M5. Allocations at Engine Lane and Youngwood Lane both of which are at the south western edge of Nailsea appear to be within the Nailsea SDL. Similarly the land at Moor Lane allocation by Nailsea rail station at Backwell would be in close proximity to the Backwell SDL.
- Allocations within South Gloucestershire include a number of areas for development at the north eastern edge of the Bristol urban area. This includes the new neighbourhood at Cribbs Causeway/Patchway which is to provide around 5,700 homes, employment and commercial

uses and the new neighbourhood at East of Harry Stoke to include 2,000 homes. Large areas of land are also safeguarded at Severnside to the west of the M5 and at Emersons Green. At Yate, in close proximity to the Yate SDL, land has been allocated for North Yate New Neighbourhood which will provide up to 3,000 homes as part of a mixed use development. The Core Strategy has also identified land at the northern edge of Thornbury by Morton Way North and by Castle School as housing opportunity areas which could provide up to 300 and 500 homes respectively. These areas are located in proximity to the Thornbury SDL.

- 7.3 Considering these allocations together with the policies of the Publication version of the JSP expected cumulative effects are set out in **Table 7.1** below.
- 7.4 The SEA Regulations require that monitoring is undertaken in relation to the significant effects of implementing the plan in question. Therefore, as significant negative effects have been identified in relation to the following SA objectives, they have been included in the SA monitoring framework:
- **2e: Access to services and facilities** (Significant negative effect: Policy 7.6 Churchill Garden Village).
  - **4a: Historic Environment** (Significant negative effect: Policy 2, Policy 6).
  - **4b: Habitats and species** (Significant negative effect: Policy 2 and Policy 6).
  - **4c: Landscape** (Significant negative effect: Policy 2, Policy 6 and all the SDL policies except Policy 7.3 Bath Rd, Brislington, Policy 7.10 Coalpit Heath and Policy 7.12 Yate).
  - **4d: Previously Developed Land** (Significant negative effect: Policy 1, 2 and all the SDL policies except Policy 7.3 Bath Rd, Brislington).
  - **4e: Best and Most Versatile Agricultural Land** (Significant negative effect: Policy 2 and Policy 7.4 Backwell, Policy 7.7 Nailsea, Policy 7.8 Buckover Garden Village and Policy 7.11 Thornbury).
- 7.5 The high level of growth supported by the JSP has the potential to result in a number of negative effects over the plan period. Policies within the plan itself are likely to help mitigate many of these potential adverse effects. Details of the policies in question have been included in **Table 7.1** alongside the SA objective they would likely help to achieve.
- 7.6 Additional mitigation is likely to be achieved through the policies of site specific allocations (for the SDLs) and policy requirements to be set out in each of the Unitary Authority's new Local Plans as well as additional sub-regional document to support the JSP, such as the new West of England Green Infrastructure Plan.

**Table 7.1 Proposed Monitoring Framework for the West of England Joint Spatial Plan**

SA objectives	Cumulative effects	Mitigation	Proposed monitoring indicators
<b>Theme 1: Improve the health, safety and wellbeing of all</b>			
<b>1a.</b> Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	Minor positive cumulative effect	Policy 2 – The Spatial Strategy Policy 5 – Place Shaping Principles Policy 6 – Strategic Infrastructure Requirements	N/A
<b>1b.</b> Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	Mixed minor positive/minor negative cumulative effect	Policy 2 – The Spatial Strategy Policy 5 – Place Shaping Principles Policy 6 – Strategic Infrastructure Requirements	N/A
<b>1c.</b> Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	Minor positive cumulative effect	Policy 2 – The Spatial Strategy Policy 5 – Place Shaping Principles Policy 6 – Strategic Infrastructure Requirements	N/A
<b>SA Theme 2: Support communities that meet people’s needs</b>			
<b>2a.</b> Deliver a suitable quantum of high quality housing for the West of England sub-region	Significant positive cumulative effect	Policy 1 – The Housing Requirement Policy 7 – Strategic Development Locations Site Requirements	N/A
<b>2b.</b> 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	Significant positive cumulative effect	Policy 3 – The Affordable Housing Target Policy 5 – Place Shaping Principles Policy 7 – Strategic Development Locations Site Requirements	N/A
<b>2c.</b> Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	Minor positive cumulative effect	Policy 2 – The Spatial Strategy Policy 5 – Place Shaping Principles Policy 6 – Strategic Infrastructure Requirements	N/A

SA objectives	Cumulative effects	Mitigation	Proposed monitoring indicators
<p><b>2d.</b> Achieve reasonable access to educational facilities (primary schools, secondary schools)</p>	<p>Uncertain significant positive cumulative</p>	<p>Policy 2 – The Spatial Strategy Policy 5 – Place Shaping Principles Policy 6 – Strategic Infrastructure Requirements</p>	<p>N/A</p>
<p><b>2e.</b> Achieve reasonable access to town centre services and facilities</p>	<p>Mixed minor positive/minor negative cumulative effect</p>	<p>Policy 2 – The Spatial Strategy Policy 5 – Place Shaping Principles Policy 6 – Strategic Infrastructure Requirements</p>	<ul style="list-style-type: none"> <li>• Total amount of floorspace for ‘town centre uses’ (South Gloucestershire Council)</li> <li>• Amount of completed retail development (sq m net floor space) (South Gloucestershire Council and North Somerset Council)</li> <li>• Amount of total primary frontage in LP Policy RT9 town and District centres plus amount and proportion of primary frontage in A1 uses (South Gloucestershire Council)</li> <li>• Percentage of vacant A1 (retail) units in South Gloucestershire’s town centres (South Gloucestershire Council)</li> <li>• Total number of A3, A4, A5 uses within Town Centres (South Gloucestershire Council)</li> <li>• Amount of completed leisure development in town centres (South Gloucestershire Council)</li> <li>• Proportion of vacant shops in all centres (South Gloucestershire Council and North Somerset)</li> </ul>

SA objectives	Cumulative effects	Mitigation	Proposed monitoring indicators
2e. cont.			<ul style="list-style-type: none"> <li>Number of all retail and other uses in Primary Shopping Frontages (South Gloucestershire Council and North Somerset Council)</li> <li>Retail permissions and completions (North Somerset Council)</li> </ul>
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	Minor positive cumulative effect	Policy 2 – The Spatial Strategy Policy 5 – Place Shaping Principles	N/A
<b>SA Theme 3: Develop a diverse and thriving economy that meets people's needs</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	Significant positive cumulative effect	Policy 4 – The Employment Land Requirement Policy 5 – Place Shaping Principles Policy 6 – Strategic Infrastructure Requirements	N/A
3b. Achieve reasonable access to major employment areas	Uncertain significant positive cumulative effect	Policy 2 – The Spatial Strategy Policy 4 – The Employment Land Requirement Policy 5 – Place Shaping Principles Policy 6 – Strategic Infrastructure Requirements	N/A
<b>Theme 4: Maintain and improve environmental quality and assets</b>			
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	Uncertain mixed minor positive/significant negative cumulative effect	Policy 5 – Place Shaping Principles	<ul style="list-style-type: none"> <li>Percentage of planning applications with an archaeological potential assessed for the development impact within consultation deadline (Bath and North East Somerset Council)</li> </ul>

SA objectives	Cumulative effects	Mitigation	Proposed monitoring indicators
4a. cont.			<ul style="list-style-type: none"> <li>• Number of planning permissions including archaeological planning conditions (Bath and North East Somerset Council)</li> <li>• Number of Listed Buildings (all grades) in the Borough (All Unitary Authorities)</li> <li>• Number and percentage of Listed Buildings at Risk (all grades) (North Somerset Council)</li> <li>• Conservation Areas/ Listed buildings/ Scheduled Monuments on the at risk register (South Gloucestershire Council)</li> <li>• Number of appeals won/lost by the Council where a Conservation Area or Listed Building was a material consideration (South Gloucestershire Council)</li> <li>• Number of Conservation Area Appraisal undertaken per year (North Somerset Council)</li> <li>• Number of Listed Buildings lost (North Somerset Council)</li> </ul>

SA objectives	Cumulative effects	Mitigation	Proposed monitoring indicators
<b>4b.</b> Minimise impact on and where possible enhance habitats and species (taking account of climate change)	Minor negative cumulative effect	Policy 2 – The Spatial Strategy Policy 5 – Place Shaping Principles	<ul style="list-style-type: none"> <li>Percentage area of SSSIs in adverse condition as a result of development (Natural England to provide)</li> <li>Area of SSSI lost as a result of built development (Natural England to provide)</li> <li>Number of Local Wildlife Sites lost and new sites designated (Bristol City Council)</li> <li>Number of Local Nature Reserves (Bristol City Council) and Number of Local Nature Reserves per head of population (North Somerset Council)</li> </ul>
<b>4c.</b> Minimise impact on and where appropriate enhance valued landscapes	Significant negative cumulative effect	Policy 2 – The Spatial Strategy Policy 5 – Place Shaping Principles	<ul style="list-style-type: none"> <li>Number. of appeals won/lost by the Council where AONB was a material consideration (South Gloucestershire Council)</li> </ul>
<b>4d.</b> Promote the conservation and wise use of land, maximising the re-use of previously developed land	Significant negative cumulative effect	Policy 2 – The Spatial Strategy West of England Green Infrastructure Plan	<ul style="list-style-type: none"> <li>Percentage of new development built on previously developed land</li> <li>Brownfield Register</li> </ul>
<b>4e.</b> Minimise the loss of productive land, especially best and most versatile agricultural land	Minor negative cumulative effect	Policy 2 – The Spatial Strategy West of England Green Infrastructure Plan	<ul style="list-style-type: none"> <li>Percentage of new development built on previously developed land</li> </ul>
<b>4f.</b> Minimise vulnerability to tidal / fluvial flooding (taking account of climate change), without increasing flood risk elsewhere	Mixed minor positive/minor negative cumulative effect	Policy 2 – The Spatial Strategy Policy 5 – Place Shaping Principles	N/A

SA objectives	Cumulative effects	Mitigation	Proposed monitoring indicators
<b>4g.</b> Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere	Mixed minor positive/minor negative cumulative effect	Policy 2 – The Spatial Strategy Policy 5 – Place Shaping Principles West of England Green Infrastructure Plan	N/A
<b>4h.</b> Minimise harm to, and where possible improve, water quality and availability	Mixed minor positive/minor negative cumulative effect	Policy 2 – The Spatial Strategy Policy 5 – Place Shaping Principles West of England Green Infrastructure Plan	N/A
<b>Theme 5: Minimise consumption of natural resources</b>			
<b>5a.</b> Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	Significant positive cumulative effect	Policy 2 – The Spatial Strategy Policy 5 – Place Shaping Principles Policy 6 – Strategic Infrastructure Requirements	N/A
<b>5b.</b> Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	Uncertain minor positive cumulative effect	Policy 2 – The Spatial Strategy Policy 5 – Place Shaping Principles	N/A

## 8 Conclusions and Next Steps

- 8.1 The Vision, Strategic Priorities, Policies and Strategic Development Locations included in the submitted West of England Joint Spatial Plan have been subject to a detailed appraisal against the Sustainability Appraisal Objectives which were developed at the Scoping stage of the SA process. Reasonable alternatives were also appraised and the SA findings contributed to decisions made by four Unitary Authorities regarding which alternatives to take forward, along with other planning considerations.
- 8.2 The West of England JSP proposes a substantial amount of housing, employment and strategic infrastructure across the sub-region to meet the future needs of the West of England; therefore the SA has identified the potential for significant negative effects on the environmental objectives including biodiversity, cultural heritage, efficient land use and flooding. However, the JSP also includes place making principles in Policy 5 and development management requirements within the SDL policies that aim to protect and enhance the economic, social and environmental conditions of the West of England. These should go a long way towards mitigating the potential negative effects of the overall scale of development proposed, although some significant effects, such as loss of high grade agricultural land are likely to remain.
- 8.3 The SA has inevitably had to make assumptions in coming to judgements of the effects of the Publication JSP. The assumption with respect to effects, cumulative or otherwise, is on the basis of the intention of the Publication JSP (i.e. what it is trying to achieve). Past experience suggests that, when considering development proposals, there will often be tensions when applying different policies, and deciding where weight should apply. Despite the best intentions of planning authorities, it may not always be possible to deliver development that meets all policy criteria and good practice guidance, and difficult choices will often have to be made. This highlights the importance of monitoring the potential significant effects identified once the JSP is adopted.

### Next Steps

- 8.4 The Consolidated SA Report and this Non-Technical Summary document are being consulted upon during the Examination of the West of England Joint Spatial Plan, from 12th November to 7th January 2019. Comments received will be reviewed and passed to the Inspectors examining the JSP. Should any modifications to the JSP be proposed during the Examination in Public hearings, there will be a further round of consultation on the Proposed Modifications, and this will be accompanied by an SA Report (or Addendum, depending on the scale of the modifications proposed). Once the JSP is adopted, an SEA Adoption Statement will be prepared to satisfy the requirements of Regulation 16(4) in the SEA Regulations (see **Table 2.1** at the start of this SA report).
- 8.5 The SDLs set out in Policy 7 of the JSP will be brought forward as allocations through each West of England authority's new Local Plan. New site-specific allocations and policy designations in Local Plans will need to be in conformity with the JSP and each Local Plan will be subject to its own SA throughout its preparation.