



Bristol Local Plan

Main Modifications

EXA067 - Habitat Regulations Assessment Addendum
(April 2026)



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1. Introduction

The Bristol Local Plan was submitted to the Secretary of State on 25th April 2024. The submission plan was accompanied by a Habitat Regulations Assessment (HRA) report containing an Appropriate Assessment (AA) of the plan as submitted¹. This update note should be read alongside the HRA AA report for explanation of the legal basis for HRA and other definitional points.

The Appropriate Assessment considered the full range of potential impacts on European designated sites in the Bristol area (referred to hereafter as habitats sites), with particular reference to potential air quality and recreational impacts on the Severn Estuary European Marine Site (EMS) and Avon Gorge Woodlands Special Area of Conservation (SAC).

The Appropriate Assessment concluded that adverse impacts on habitats sites in the Bristol area as a result of the Bristol Local Plan could be ruled out, although ongoing monitoring was recommended for potential in-combination effects with other strategies in the wider area such as neighbouring authorities' local plans.

In February 2025, in the run-up to the examination hearings for the Bristol Local Plan, Natural England confirmed that they supported the findings of the HRA AA report subject to a modification to policy DS4 of the emerging local plan requiring development in the Western Harbour to contribute to a mitigation strategy produced to address recreational pressures on Avon Gorge Woodlands².

As a result of the examination process there are now several main modifications to be made to the local plan as originally submitted. This update note has been prepared to ensure that any likely significant effects on habitats sites are identified, and that suitable mitigation measures are in place.

The update has been carried out in accordance with the relevant Government guidance³.

¹ [Bristol Local Plan: Habitats Regulations Assessment Appropriate Assessment of the Bristol Local Plan Submission Version \(2024\): Submission Stage](#)

² [Natural England's response to Inspectors' Questions](#)

³ [Habitats regulations assessments: protecting a European site - GOV.UK](#)

2. Screening the main modifications

2.1 Initial sift for screening

At the HRA screening stage in July 2023, the following policies of the Bristol Local Plan, which are concerned principally with the **location and amount of development**, were screened into the Appropriate Assessment (AA) as having likely significant effects on habitats sites:

- Policies DS1-DS14 (the 'Development Strategy')
- Policy H1: Delivery of new homes – Bristol's housing requirement
- Policy H5: Self-build and community-led housing
- Policy E4: Avonmouth Industrial Area and Bristol Port
- Policy E5: Industry and Distribution Areas
- Policy FR2: Bristol Avon Flood Strategy
- Policy DA1: Proposed development allocations
- Policy T2: Transport infrastructure improvements
- Policy NZC5: Renewable energy and energy efficiency
- Policy UM4: Sewage treatment works

Where the modification stage has resulted in the deletion of an element of these policies, or (a modification which carries no consequence for HRA process), the deletions have been scoped out of the screening exercise, on the basis that there is no longer policy wording to assess. This includes the deletion of individual allocations under Policy DA1, and the minor reduction in a site allocation boundary⁴.

Where the modification stage has resulted in the inclusion of a new policy, or element of policy, these will be subject to the screening exercise in section 2.2 below. These are:

- Policy H10: Travellers (inclusion of a site-specific allocation)
- Policy H11: Houseboat Dwellers (new policy)

The remaining policies of the local plan were 'screened out' at the HRA screening stage. Modifications to those screened out policies have been reviewed for any changes of relevance to the AA which could trigger a need for rescreening of the policy. It is considered that the screening remains valid for other policies, with modifications leading to neutral impact on habitats sites, with the exception of the following policy will be the subject to the screening exercise due to a revised figure:

⁴ BDA3401 (under construction); BSA1115 (under construction); BSA1118 (under construction); BDA1305 (site of nature conservation interest, development for industry no longer required); SA202 (no longer suitable); BDA0801 (reduced); BDA0802 (reduced – now addressed by policy DS1); BDA2301 (reduced); BSA1109 (reduced); BSA1120 (reduced); SA101 (reduced); SA509 (reduced); SA608 (reduced)

- Policy E2: Economic development land strategy

The proposed main modifications to these policies are screened through this chapter for any likely significant effects on habitats sites, particularly in relation to any change to the amount of development proposed and any specific references made to habitats issues. The Screening Criteria are presented in Appendix 1 (extract from Stage 1 Screening Report).

The HRA AA report identifies the following local plan policies as providing **embedded mitigation**:

- Policy E4: Avonmouth Industrial Area and Bristol Port
- Policy BG2: Nature conservation and recovery
- Policy T1: Development and transport principles
- Policy T2: Transport infrastructure improvements
- Policy T3A: Transport development management
- Policy T4A: Parking, servicing and the provision of infrastructure for electric vehicles
- Policy T6: Active travel routes
- Policy NZC1: Climate change, sustainable design and construction
- Policy NZC5: Renewable energy and energy efficiency
- Policy HW2: Air quality

The proposed main modifications to these policies are screened in this chapter for any change to their embedded mitigation function that may result in likely significant effects on habitats sites.

2.2 Policies for the location and amount of development

Effects by policy

Policy	Likely significant effects assessed (2024 HRA AA)	Relevant modifications (and comparison with publication version)	Commentary and outcome
<p>DS1-DS14: Development Strategy (overall)</p>	<p>The HRA AA assessed the development and operation of residential and mixed-use allocations for its potential impact on the Severn Estuary EMS, including in relation to disturbance to habitats or species from increased recreational use; air quality impacts from increased emissions; and water quality impacts arising from construction.</p> <p>The HRA AA also assessed the development and operation of residential and mixed-use allocations for its potential impact on the Avon Gorge Woodlands SAC, including in relation to air quality impacts</p>	<p>As detailed in relation to specific policies below.</p>	<p>As detailed in relation to specific policies below, the modifications do not significantly change the overall capacity of development facilitated by these development strategy policies or its intended location.</p> <p>These modifications do not result in any changes to the conclusions of the assessment at publication stage (2024 HRA AA).</p>

	from increased emissions; and disturbance to habitats from increased recreational use.		
DS1: Bristol City Centre	<p>The HRA AA assessed the potential impact of development in the city centre on the Avon Gorge Woodlands SAC in relation to water quality impacts arising from construction.</p> <p>The HRA AA also made specific mention of DS1 in its assessment of the potential impact of construction disturbance on functionally linked land that supports species in the Severn Estuary EMS.</p>	<p>Homes: 7,500 (previously expressed as ‘thousands’ including 2,500 homes within the City Centre Development and Delivery Plan areas – overlapped/embedded with other central Bristol development strategy areas)</p> <p>Addition of a place-based approach to development in Redcliffe Way, previously expressed as a development allocation (Policy DA1).</p>	<p>The 7,500 homes figure aggregates figures from policies DS1A, DS2, DS4 and DS5, while no specific capacity is stated for development at Redcliffe Way (which was also the case for the development allocation).</p> <p>The modifications do not significantly change the overall capacity of development facilitated by these development strategy policies or its intended location.</p> <p>The modifications do not result in any changes to the conclusions of the assessment at publication stage (2024 HRA AA).</p>
DS1A: Bristol City Centre – Broadmead, Castle Park and the Old City	No specific mention outside of the overall references to the Development Strategy.	Homes: 2,500 (previously embedded within DS1 which referred to 2,500 homes within the coterminous City Centre Development and Delivery Plan area)	<p>The introduction of housing figures, while providing more specific information, do not change the overall capacity of development facilitated by the development strategy policy or its intended location.</p> <p>The modifications do not result in any changes to the conclusions of the assessment at publication stage (2024 HRA AA).</p>
DS2: Bristol Temple Quarter	The HRA AA assessed the potential impact of development	Homes: 3,000 (previously 2,500)	The introduction of business floorspace figures, while providing more specific information, does

	<p>in Bristol Temple Quarter on the Avon Gorge Woodlands SAC in relation to water quality impacts arising from construction.</p>	<p>Office: 100,000m² (previously expressed as provision of ‘additional high-quality offices and flexible workspace’. The figure reflects gross development targets which incorporate existing supply, recent completions, historic development trends, current commitments and intelligence on potential future development. The figure is an expression of the intention of the policy, which was known at the time of the assessment)</p>	<p>not change the mix of uses or the overall scale of development previously expected by the policy.</p> <p>The increase to the housing figure represents a relatively minor increase to the capacity at the site and does not significantly change the overall capacity of development facilitated by this development strategy policy or its intended location.</p> <p>The modifications do not result in any changes to the conclusions of the assessment at publication stage (2024 HRA AA) particularly as the mitigation relates to construction management.</p>
<p>DS3: St. Philip’s Marsh</p>	<p>The HRA AA assessed the potential impact of development in St. Philip’s Marsh on the Avon Gorge Woodlands SAC in relation to water quality impacts arising from construction.</p>	<p>Homes: 7,000 (previously expressed as thousands of new homes within the context of the aim of 10,000 homes across DS2 and DS3 as expressed in framework documents)</p> <p>Office: 40,000m² (previously expressed as ‘high quality offices. The figure reflects gross development targets which incorporate existing supply, recent completions, historic development trends, current commitments and</p>	<p>The introduction of business floorspace figures and housing figures, while providing more specific information, does not change the mix of uses and do not significantly change the overall capacity of development facilitated by the development strategy policy or its intended location.</p> <p>The modifications do not result in any changes to the conclusions of the assessment at publication stage (2024 HRA AA) particularly as the mitigation relates to construction management.</p>

		<p>intelligence on potential future development. The figure is an expression of the intention of the policy, which was known at the time of the assessment)</p> <p>Industry and distribution: 110,000m² (previously expressed as ‘industry and distribution premises including provision for research and development and flexible workspace’. The figure reflects the identified potential capacity of the DS area for industrial space, recognising that the existing supply is 137,000m². The figure is an expression of the intention of the policy, which was known at the time of the assessment)</p>	
<p>DS4: Western Harbour</p>	<p>The HRA AA assessed the potential impact of development at Western Harbour on the Avon Gorge Woodlands SAC, including in relation to disturbance to habitats from increased recreational use; and water</p>	<p>Homes: 1,000 (previously expressed as new homes in a new city quarter)</p> <p>Requirement for a mitigation strategy to be developed to allow for an understanding of the allocation’s impact on recreational pressure on the Avon Gorge</p>	<p>The introduction of a housing figure, while providing more specific information, does not change the mix of uses or change the overall capacity of development facilitated by the development strategy policy or its intended location.</p> <p>The modification to develop a mitigation strategy has been made following Natural</p>

	<p>quality impacts arising from construction.</p> <p>The HRA AA concludes that the Local Plan is unlikely to result in any increased recreational or similar incursions that might arise from adjacent development.</p> <p>The HRA AA also made specific mention of DS4 its assessment of the potential impact of residential and mixed-use allocations on the Severn Estuary EMS in relation to the construction disturbance of functionally linked land that supports species in the EMS; and water quality impacts arising from construction.</p>	<p>Woodland SAC, and identify any required appropriate mitigation measures to be secured at grant of planning permission</p>	<p>England’s advice during the Local Plan examination. This is done in order to provide sufficient certainty that the growth at DS4 does not, alone, significantly affect the qualifying features at the Avon Gorge Woodland SAC.</p> <p>This requires that work will be undertaken to understand the extent of pressures on the SAC (that is likely to be generated by the allocation) and to identify and secure any necessary appropriate mitigation. Policy DS4 already establishes ‘embedded mitigation’ through requirements to enhance provision of high quality public open spaces, green infrastructure and public realm, and the modification will ensure that these measures, and/or further off-site measures provide certainty that there will be no likely significant effects arising.</p> <p>The submission HRA concluded that the plan as a whole will not give rise to AEoI on the site. This conclusion has not changed as a result of the modification, which provides the policy with a further element of embedded mitigation which will promote positive outcomes.</p>
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<p>DS5: Frome Gateway</p>	<p>No specific mention outside of the overall references to the Development Strategy.</p>	<p>Homes: Around 1,000 (Previously understood in the context of the approved Frome Gateway Spatial Regeneration Framework which sets out the vision for the delivery of roughly 1,000 new homes)</p> <p>Office: 9,000m² (previously expressed as the ‘re-incorporation of high-quality workspace’. The figure reflects gross development targets which incorporate existing supply, recent completions, historic development trends, current commitments and intelligence on potential future development. The figure is an expression of the intention of the policy, which was known at the time of the assessment)</p> <p>Industry and distribution: 8,000m² (The figure reflects the identified potential capacity of the DS area for industrial space, recognising that the existing supply is 35,200m². The figure is an expression of the intention of the policy, which was</p>	<p>The introduction of a housing figure and business floorspace figures, while providing more specific information, does not change the mix of uses and does not significantly change the overall capacity of development facilitated by the development strategy policy or its intended location.</p> <p>The modifications do not result in any changes to the conclusions of the assessment at publication stage (2024 HRA AA) particularly as the mitigation relates to construction management.</p>
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		known at the time of the assessment)	
DS6: Lawrence Hill	No specific mention outside of the overall references to the Development Strategy.	<p>Homes: Around 1,500 (Previously expressed in the explanatory text)</p> <p>Office: 6,400m² (previously expressed as ‘high quality workspace, providing for a range of business uses’. The figure reflects gross development targets which incorporate existing supply, recent completions, historic development trends, current commitments and intelligence on potential future development. The figure is an expression of the intention of the policy, which was known at the time of the assessment)</p> <p>Industry and distribution: 40,000m² (the figure reflects the identified potential capacity of the DS area for industrial space, recognising the existing supply is 53,000m². The figure is an expression of the intention of the policy, which was</p>	<p>The introduction of a housing figure and business floorspace figures, while providing more specific information, does not change the mix of uses and does not significantly change the overall capacity of development facilitated by the development strategy policy or its intended location.</p> <p>The modifications do not result in any changes to the conclusions of the assessment at publication stage (2024 HRA AA) particularly as the mitigation relates to construction management.</p>

		<p>known at the time of the assessment)</p>	
<p>DS7: Central Fishponds</p>	<p>No specific mention outside of the overall references to the Development Strategy.</p>	<p>Homes: Around 1,500 (Previously 1,500 stated in the policy explanation)</p> <p>Office: 5,500m² (previously expressed as ‘high quality workspace, providing for a range of business uses’. The figure reflects gross development targets which incorporate existing supply, recent completions, historic development trends, current commitments and intelligence on potential future development. The figure is an expression of the intention of the policy, which was known at the time of the assessment)</p> <p>Industry and distribution: 9,800m² (the figure reflects the identified potential capacity of the DS area for industrial space, recognising the existing supply is 39,000m². The figure is an expression of the intention of the policy, which was</p>	<p>The introduction of a housing figure and business floorspace figures, while providing more specific information, does not change the mix of uses and does not significantly change the overall capacity of development facilitated by the development strategy policy or its intended location.</p> <p>The modifications do not result in any changes to the conclusions of the assessment at publication stage (2024 HRA AA) particularly as the mitigation relates to construction management.</p>

		known at the time of the assessment)	
DS8: Central Bedminster	No specific mention outside of the overall references to the Development Strategy.	<p>Homes: Around 3,500 (previously understood with reference to the approved Whitehouse Street Regeneration Framework of 2,000 homes, and the approved Bedminster Green Framework of potential for around 2,200 homes (less the existing completions)</p> <p>Office: 2,000m² (previously expressed as ‘high quality workspace, providing for a range of business uses’. The figure reflects gross development targets which incorporate existing supply, recent completions, historic development trends, current commitments and intelligence on potential future development. The figure is an expression of the intention of the policy, which was known at the time of the assessment)</p> <p>Industry and distribution: 11,700m² (the figure reflects the identified</p>	<p>The introduction of a housing figure and business floorspace figures, while providing more specific information, does not change the mix of uses and does not significantly change the overall capacity of development facilitated by the development strategy policy or its intended location.</p> <p>The modifications do not result in any changes to the conclusions of the assessment at publication stage (2024 HRA AA) particularly as the mitigation relates to construction management.</p>

		potential capacity of the DS area for industrial space, recognising the existing supply is 39,000m ² . The figure is an expression of the intention of the policy, which was known at the time of the assessment)	
DS9: Brislington	No specific mention outside of the overall references to the Development Strategy.	Homes: At least 500 (Previously the 500 home capacity was contained in the policy explanation) Industry and distribution: 28,500m ² (the figure reflects the identified potential capacity of the DS area for industrial space, recognising the existing supply is 28,500m ² . The figure is an expression of the intention of the policy, which was known at the time of the assessment)	The introduction of a housing figure and business floorspace figures, while providing more specific information, does not change the mix of uses and does not significantly change the overall capacity of development facilitated by the development strategy policy or its intended location. The modifications do not result in any changes to the conclusions of the assessment at publication stage (2024 HRA AA) particularly as the mitigation relates to construction management.
DS10: The Green Belt	The HRA AA assessed the removal of Green Belt designations at southwest Bristol in favour of development	Policy simplified to defer to national planning policy.	The modifications do not change the overall amount of development proposed by the plan or its intended location.

	allocations (policy DS11) for potential loss or construction/operational disturbance of functionally linked land that supports species in the North Somerset and Mendip Bats SAC.		
DS11: Development allocations – south west Bristol	The HRA AA assessed the development and operation of new homes at southwest Bristol for potential loss or construction/operational disturbance of functionally linked land that supports species in the North Somerset and Mendip Bats SAC.	Requirement for ecological survey, assessment of impacts and strategy for mitigation / compensation in accordance with policy BG2.	The introduction of the additional requirement provides the plan with a further element of embedded mitigation which will promote positive outcomes.
DS12: New neighbourhood – Bath Road, Brislington	No specific mention outside of the overall references to the Development Strategy.	No relevant modifications.	
DS13: Lockleaze	No specific mention outside of the overall references to the Development Strategy.	Homes: Around 1,200 (Previously the 1,200 capacity was contained in the policy explanation) Industry and distribution: 9,200m ² (the figure reflects the identified potential capacity of the DS area for	The introduction of a housing figure and business floorspace figures, while providing more specific information, does not change the mix of uses and does not significantly change the overall capacity of development facilitated by the development strategy policy or its intended location.

		industrial space, recognising the existing supply is 8000m ² . The figure is an expression of the intention of the policy, which was known at the time of the assessment)	The modifications do not result in any changes to the conclusions of the assessment at publication stage (2024 HRA AA) particularly as the mitigation relates to construction management.
DS14: Central Southmead	No specific mention outside of the overall references to the Development Strategy.	Homes: Around 300 (Previously the 300 capacity was contained in the policy explanation)	The introduction of a housing figure does not change the mix of uses and does not significantly change the overall capacity of development facilitated by the development strategy policy or its intended location. The modifications do not result in any changes to the conclusions of the assessment at publication stage (2024 HRA AA) particularly as the mitigation relates to construction management.
H1: Delivery of new homes – Bristol’s housing requirement	The overarching effects of policy H1 were noted in the HRA AA, given spatial expression through the development strategy and development allocations. The HRA AA assessed the development and operation of new homes for its potential impact on the Severn Estuary EMS, including in relation to the disturbance to habitats or species from increased	Modifications increase the housing requirement from a minimum of 1,925 homes a year to 2,218 homes, noting that the overall requirement for the Plan Period has increased to 39,915 from 34,650. Modified to include an updated housing trajectory	The modifications to policy H1 have increased the overall minimum housing requirement from 34,650 dwellings to 39,915 dwellings (1,925 to 2,218 dwellings per annum). This amends the publication version policy approach which defined a minimum requirement and stated the intention to ‘exceed’ that minimum. The modification to the housing requirement reflects the total capacity identified at submission in the evidence provided by the council. It has not been necessary to identify

	<p>recreational use; air quality impacts from increased emissions; water quality impacts arising from construction; and the construction disturbance of functionally linked land that supports species in the EMS.</p> <p>The HRA AA also assessed the potential impact of development at Western Harbour on the Acon Gorge Woodlands SAC, including in relation to disturbance to habitats from increased recreational use; air quality impacts from increased emissions; and water quality impacts arising from construction.</p> <p>The HRA AA also assessed the development and operation of new homes for potential loss or construction/operational disturbance of functionally linked land that supports species in the North Somerset and Mendip Bats SAC.</p>		<p>any additional allocations to accommodate this uplift, as the figures are based on known capacity within the submitted growth strategy areas ('DS' policy areas).</p> <p>The 2024 HRA AA understood that the submission version of H1 did not 'cap' housing delivery, and the AA interpreted the ambition to exceed the target within the plan's growth strategy via the allocations (Policy DA1) and the 14 Areas of Growth and Regeneration.</p> <p>Nevertheless, it is noted that the intention of the modified policy is to require the delivery of more housing during the plan period than previously proposed. As such, a review of the impact of the proposed uplift to the housing requirement on the conclusions of the HRA has been undertaken (see Appendix 2).</p> <p>As shown in Appendix 2, it is not anticipated that the uplift in housing requirement would affect the original outcomes of the assessment.</p> <p>Furthermore, the monitoring trigger will require reassessment of planned development before a figure 34,650 figure is reached. It is noted that in practice the local plan will already be subject of review under the new system and that new local plan will itself be subject of the necessary habitat assessment process.</p>
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H5: Self-build and community-led housing	No specific reference made, beyond the general references made in relation to all residential development (policy H1).	No relevant modifications.	
H10: Planning for Traveller Sites	No specific reference made.	An allocation for 6 to 8 pitches on a 0.3ha site has been introduced through this policy at Western Drive, Hengrove Way. (Policy H10 as drafted is a criteria-based permissive approach, allowing for the provision of traveller accommodation to meet the identified needs, which are greater than accommodated via the proposed modification).	The site falls within the specified zones of influence and is currently identified for development for industrial use (SA&DMLP 2014 Policy DM13). No material change is therefore expected from current local plan in terms of effects of site development. When considered in combination with the modifications to principal site allocation policy DA1, the modifications do not change the overall amount of development proposed by the plan. No material change is therefore expected from current local plan in terms of effects.
H11: Houseboat Dwellers	Not applicable.	NEW POLICY which provides decision making criteria	Policy listing general criteria for testing the acceptability / sustainability of proposals for new moorings to meet identified need. This is screened out in line with the rationale in Screening Category B
E2: Economic development land strategy	Not applicable. The policy was screened out at the HRA screening stage under Screening categories C and G	Net additional office floorspace: 316,895m ² (To reflect planning permissions pipeline. Previously presented as	Modification to change the office floorspace figure is a result of adding in the pipeline of existing planning permissions for this use. This modification remains screened out in line with Screening Category C, (Proposal referred to but not proposed by the plan): In line with

		<p>164,000m² which was in addition to the pipeline)</p> <p>Clarification of scale of development within allocations at Avonmouth.</p> <p>Clarification of appropriate Use Classes</p>	<p>the screening guidance, the addition of the consented pipeline to the requirement figure represents an element of the supply that would proceed regardless of whether the Local Plan is adopted or without reference to it.</p> <p>Policy E2 directs office development to specific locations, and these locational policies are screened into the AA and have been assessed elsewhere.</p>
E4: Avonmouth Industrial Area and Bristol Port	<p>The HRA AA assessed the development and operation of the Avonmouth Industrial Area and the four new development allocations for their potential impact on the Severn Estuary EMS, including in relation to air quality impacts from increased emissions; water quality impacts arising from construction (particularly site ASA005); and loss or construction/operational disturbance of functionally linked land that support species in the EMS.</p>	<p>Industry and distribution: 60 ha / 146,300m² across 4 sites (previously allocation were expressed as total development area across the four identified sites without specific floorspace estimates. Policy continues to note that the largest of the allocations – Kingsweston Lane - is subject of planning permission for industrial development. This permission is now under construction)</p>	<p>The modifications to policy E4, while providing more specific information on floorspace, do not affect the type of development, land take or characteristics of the impact of the development allocations.</p>
E5: Industry and	<p>The HRA AA assessed the development and operation of Industry and Distribution Areas</p>	<p>No relevant modifications.</p>	

<p>Distribution Areas</p>	<p>and Maritime Industrial Areas for its potential impact on the Severn Estuary EMS, including in relation to air quality impacts from increased emissions; and water quality impacts arising from construction.</p> <p>The HRA AA also assessed the development and operation of Industry and Distribution Areas and Maritime Industrial Areas for its potential impact on the Avon Gorge Woodlands SAC, including in relation to air quality impacts from increased emissions; and water quality impacts arising from construction.</p>		
<p>T2: Transport infrastructure improvements</p>	<p>The HRA AA assessed the development and operation of the proposed transport infrastructure improvements for their potential impact on the Severn Estuary EMS, including in relation to air quality impacts from increased emissions; and loss or operational disturbance</p>	<p>No relevant modifications.</p>	

	<p>of functionally linked land that support species in the EMS.</p> <p>The HRA AA also assessed the of the proposed transport infrastructure improvements for their potential impact on the Avon Gorge Woodlands SAC, including in relation to air quality impacts from increased emissions; and water quality impacts arising from construction.</p>		
<p>NZC5: Renewable energy and energy efficiency</p>	<p>The HRA AA assessed the development and operation of renewable energy projects for potential impact on the Severn Estuary EMS, including in relation to water quality impacts arising from construction; and loss or construction/operational disturbance of functionally linked land that support species in the EMS.</p>	<p>No relevant modifications.</p>	
<p>FR2: Bristol Avon Flood Strategy</p>	<p>The HRA AA assessed the development and operation of the proposed tidal flood defences for potential impact on</p>	<p>No modifications.</p>	

	<p>the Severn Estuary EMS, including in relation to water quality impacts arising from construction; and loss or construction disturbance of functionally linked land that support species in the EMS.</p> <p>The HRA AA also assessed the development and operation of the proposed tidal flood defences for potential impact on the Avon Gorge Woodlands SAC, including in relation to habitat loss; air quality impacts through increased emissions; water quality impacts through changes to the conveyance of floodwaters; and water quality impacts arising from construction.</p>		
<p>UM4: Sewage treatment works</p>	<p>The HRA AA assessed the development and operation of the sewage works expansion site for its potential impact on the Severn Estuary EMS, including in relation to water quality impacts arising from construction; and loss or construction disturbance</p>	<p>No modifications.</p>	

	<p>of functionally linked land that support species in the EMS.</p>		
<p>DA1: Proposed development allocations</p>	<p>The HRA AA assessed the development and operation of residential and mixed-use allocations for its potential impact on the Severn Estuary EMS, including in relation to disturbance to habitats or species from increased recreational use; air quality impacts from increased emissions; and water quality impacts arising from construction.</p> <p>The HRA AA also assessed the development and operation of residential and mixed-use allocations on the Avon Gorge Woodlands SAC, including in relation to disturbance to habitats from increased recreational use; air quality impacts from increased emissions; and water quality impacts arising from construction.</p>	<p>Boundary changes: BDA0302 (slight enlargement to reflect planning permission) SA510 (slight enlargement to reflect planning permission increasing yield from 250 to 358 homes)</p>	<p>The boundary changes result in minimal change and are not expected to result in significant effects.</p>

	<p>The HRA AA also assessed the development and operation of new homes and mixed-use developments for potential loss or construction/operational disturbance of functionally linked land that supports species in the North Somerset and Mendip Bats SAC.</p>		
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Effects from the plan as a whole

The HRA AA 2024 assessed the potential for the local plan to affect water quantity and quality in the Severn Estuary EMS and water quantity in the Chew Valley Lake Special Protection Area (SPA) from increased abstraction, increased wastewater generation/discharge and the direct effects of development construction. The modifications to the plan do not significantly affect the capacity of development in the locations identified for development (as detailed in the commentary to modifications to Policy H1 and Policy E2) and consequently there is no change to the conclusions of the 2024 HRA AA.

The HRA AA also assessed the potential for the local plan to affect water quantity and quality in Avon Gorge Woodlands SAC through changes to the conveyance of floodwaters and increased wastewater generation/discharge. The modifications to the plan do not significantly affect the capacity of development in the locations identified for development (as detailed in the commentary to modifications to Policy H1 and Policy E2) and consequently there is no change to the conclusions of the 2024 HRA AA.

The HRA AA also assessed the potential for the local plan to affect air quality beyond the local authority boundary within the North Somerset and Mendip Bats SAC due to increased transport emissions. The modifications to the plan do not affect the scale of development in the locations identified for development (as detailed in the commentary to modifications to Policy H1 and Policy E2) and consequently there is no change to the conclusions of the 2024 HRA AA.

In addition to the more detailed and specific assessments in relation to recreational impacts on the Severn Estuary EMS and Avon Gorge Woodlands SAC, the HRA AA assessed the potential for the local plan to cause additional recreational disturbance to the Chew Valley Lake SPA. The modifications to the plan do not affect the scale of development in the locations identified for development (as detailed in the commentary to modifications to Policy H1 and Policy E2) and consequently there is no change to the conclusions of the 2024 HRA AA.

2.3 Policies providing embedded mitigation

Policy	Mitigation role (2024 HRA AA)	Relevant modifications (and comparison with publication version)	Commentary and outcome
E4: Avonmouth Industrial Area and Bristol Port	Mitigates harm to habitats and species in the Severn Estuary EMS by requiring contributions to Hallen Marsh habitat mitigation.	No relevant modifications.	
BG2: Nature conservation and recovery	<p>Sufficient safeguarding to resist direct habitat loss in Severn Estuary EMS and Avon Gorge Woodlands SAC.</p> <p>Through overarching consideration of the impact of new development and the requirement for project-based assessment, mitigates:</p> <ul style="list-style-type: none"> • Recreational disturbance to habitats and species in the Severn Estuary EMS. • Air quality impacts on Severn Estuary EMS, Avon Gorge Woodlands SAC and North Somerset and Mendip Bats SAC through increased emissions. 	Policy wording revised to align more closely with national planning policy in relation to the mitigation hierarchy and irreplaceable habitats.	Through better alignment with national planning policy, the policy will be more effective. The embedded mitigation role remains as referred to in the previous policy wording.

	<ul style="list-style-type: none"> • Loss or construction / operational disturbance of land functionally linked to Severn Estuary EMS and North Somerset and Mendip Bats SAC. • Construction impacts on water quality in the Avon Gorge Woodlands SAC and tributaries to the Severn Estuary EMS. • Water quality impacts on Avon Gorge Woodlands SAC through changes to the conveyance of floodwaters. 		
<p>T1: Development and transport principles</p>	<p>Through measures to further reduce traffic and facilitate lower emission modes of transport, mitigates:</p> <ul style="list-style-type: none"> • Air quality impacts on Severn Estuary EMS, Avon Gorge Woodlands SAC and North Somerset and Mendip Bats SAC through increased emissions. • Disturbance to functionally linked land supporting species in the Severn Estuary EMS. 	<p>No relevant modifications.</p>	

<p>T2: Transport infrastructure improvements</p>	<p>Through measures to further reduce traffic and facilitate lower emission modes of transport, mitigates:</p> <ul style="list-style-type: none"> • Air quality impacts on Severn Estuary EMS, Avon Gorge Woodlands SAC and North Somerset and Mendip Bats SAC through increased emissions. • Disturbance to functionally linked land supporting species in the Severn Estuary EMS. 	<p>No relevant modifications.</p>	
<p>T3A: Transport development management</p>	<p>Through measures to further reduce traffic and facilitate lower emission modes of transport, mitigates:</p> <ul style="list-style-type: none"> • Air quality impacts on Severn Estuary EMS, Avon Gorge Woodlands SAC and North Somerset and Mendip Bats SAC through increased emissions. • Disturbance to functionally linked land supporting species in the Severn Estuary EMS. 	<p>Modifications include an additional reference to the cumulative impact of development on the road network.</p>	<p>The additional reference to cumulative impact results in a more effective policy. The embedded mitigation is as set out in the previous version of the policy.</p>
<p>T4A: Parking, servicing and the provision of infrastructure for electric vehicles</p>	<p>Through measures to further reduce traffic and facilitate lower emission modes of transport, mitigates:</p>	<p>No relevant modifications.</p>	

	<ul style="list-style-type: none"> • Air quality impacts on Severn Estuary EMS, Avon Gorge Woodlands SAC and North Somerset and Mendip Bats SAC through increased emissions. • Disturbance to functionally linked land supporting species in the Severn Estuary EMS. 		
<p>T6: Active travel routes</p>	<p>Through measures to further reduce traffic and facilitate lower emission modes of transport, mitigates:</p> <ul style="list-style-type: none"> • Air quality impacts on Severn Estuary EMS, Avon Gorge Woodlands SAC and North Somerset and Mendip Bats SAC through increased emissions. • Disturbance to functionally linked land supporting species in the Severn Estuary EMS. 	<p>No relevant modifications.</p>	
<p>NZC1: Climate change, sustainable design and construction</p>	<p>Water efficiency standard helps to mitigate effect of increased water abstraction on Severn Estuary EMS and Chew Valley Lake SPA.</p>	<p>Policy wording on water efficiency has been modified and expanded for clarity.</p>	<p>The water efficiency standard is not changed by the modifications.</p>
<p>NZC5: Renewable energy and energy efficiency</p>	<p>Mitigates potential disturbance to functionally linked land that supports species in the Severn Estuary EMS by</p>	<p>Some policy wording has been removed to reduce overlaps with other policies, including the specific</p>	<p>Whilst the modifications to this policy remove wording on impact on biodiversity, that aim is achieved by</p>

	giving significant weight to biodiversity impacts.	reference to biodiversity, in the interests of consistency and clarity.	Policy BG2 which continues to provide embedded mitigation to the same effect.
HW2: Air quality	Mitigates air quality impacts on Severn Estuary EMS and North Somerset and Mendip Bats SAC by requiring sustainable transport improvements and resisting development with significant local emissions to the detriment of air quality.	Modifications include a specific reference to the potential impact of air quality on biodiversity, particularly protected habitats such as SACs. Development with the potential for a negative impact will not be permitted unless it is essential for reasons of economic or wider social need.	With the additional reference to biodiversity impacts the embedded mitigation role remains as previously set out.

3. Conclusion

As set out in section 2 of this note, the proposed main modifications to the local plan have been screened for likely significant effects on habitats sites. No likely significant effects have been identified and consequently the conclusions of the 2024 assessment remain unchanged for the modified version of the Local Plan.

Appendix 1 – HRA Screening Criteria for Assessing the Local Plan

Extract from Bristol Local Plan Pre-Submission Publication Version Stage 1: Habitats Regulations Assessment Screening Report (2023)

Table 1. Characteristics of policies that can be screened out (Source: Joint Spatial Plan)

Criteria	Description
General statements of policy	The European Commission recognises that plans or plan components that are general statements of policy or political aspirations cannot have significant effects ¹¹ .
General design/ design criteria	A general 'criteria-based' policy expresses the tests or expectations of the plan-making body when it comes to consider particular proposals, or relate to design or other qualitative criteria which do not themselves lead to development (e.g. controls on building design).
External plan / projects	Plans or projects that are proposed by other plans and are referred to in the plan being assessed for completeness.
Environmental protection policies	Policies designed to protect the natural or built environment will not usually have significant or adverse effects.

Table 2. Screening Criteria for Assessing the Local Plan Pre-Submission Publication Draft

Screening Category	Criteria	Description	Screening Outcome
A	General statement of policy / general aspiration	This includes policies where effects on an EDS cannot be identified because these are too general (i.e., it is not known where or how the proposal may be implemented or which sites may be affected). These may include the need for a broad quantum of housing or employment, without specific consideration as to where development is to be provided, unless the total quantity and nature of change is so great that, no matter where it was located, it could not be delivered without affecting an EDS.	Screened out
B	Policy listing general criteria for testing the acceptability / sustainability of proposals	These are likely to include policies which are designed to test the acceptability of development management applications for general sustainability credentials.	Screened out

Screening Category	Criteria	Description	Screening Outcome
C	Proposal referred to but not proposed by the plan	<p>This may include proposals for specific projects which are identified in higher policy frameworks, such as nationally significant infrastructure projects. It may be necessary for the Local Plan to make reference to these projects, however these are not proposals made by the Local Plan.</p> <p>An exception to this is where agreement has been reached that the principle of the project is established within the Local Plan itself. Distinction needs to be made about whether these projects would proceed regardless of whether the Local Plan is adopted or without reference to it.</p> <p>Development proposed by the Local Plan-making body which will utilise the benefit of the major infrastructure improvements of other proposals should not be screened out at this stage.</p>	Screened out
D	General plan-wide environmental protection / site safeguarding policy	<p>These tend to include plan-wide policies for which an overarching obvious purpose is to protect the natural environment, or to conserve and enhance the natural, built and historic environment. These can be screened out on the basis that whilst these may have an incidental effect on protecting EDS, that is not the purpose of the policy.</p> <p>Should these policies contain caps or limited which would not have the effect of protecting EDS from significant effects must be screened in (i.e., 'planning permission will not be granted for development proposals which would be likely to have an adverse effect on SSSI or LWS').</p>	Screened out
E	Policies or proposals which steer change in such a way as to protect EDS from adverse effects	These types of policies or proposals will have the indirect or unintentional effect of steering change away from EDS, whose qualifying features may be affected by the change and can therefore be screened out.	Screened out
F	Policy that cannot lead to development or other change	Policies which do not in themselves lead to development or other change, for example, topic-specific criteria policies on design, layout or materials, can be screened out.	Screened out
G	Policy or proposal that could not have any conceivable effect on a site	<p>These are policies which make provision for change but which could have no conceivable effect on an EDS, because there is no causal connection or link between them and qualifying features of an EDS.</p> <p>Where a plan may affect an EDS, but effects are positive, this aspect of the plan can be screened out of the assessment.</p>	Screened out
H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in-combination with other aspects of this or other plans or projects)	<p>Policies or proposals which make provision for change, and which could have no significant effect on an EDS either alone or in-combination with other aspects of the same plan, or in-combination with other plans and projects, can be screened out. These may include cases where there are some potential effects, but these would be plainly insignificant.</p> <p>An example may be where a plan provides for new development focused heavily within an existing urban area, for which it can ruled out that the SPA is so remote that there would be no effect at all, or effects would be imperceptible.</p>	Screened out
I	Policy or proposal with a likely significant effect on a site alone	<p>Whilst it is not possible to provide an exhaustive list of all the ways that a policy or proposal may have a significant effect on an EDS, there are several examples of ways which plans could have significant effects alone¹²:</p> <ul style="list-style-type: none"> • The plan could directly affect an EDS because it provides for, or steers, or otherwise causes, a change on the EDS itself, • The plan could indirectly affect an EDS e.g. because it provides for, or steers, or otherwise causes a quantity or type of change that causes effects linked to the site by impact routes, pathways or 	Screened in

Screening Category	Criteria	Description	Screening Outcome
		<p>mechanisms, creating biophysical changes in e.g. ecosystems, hydrology, air or water quality, or through increased disturbance;</p> <ul style="list-style-type: none"> Proposals for a magnitude of change that, no matter where it was located, it would be likely to have a significant effect: on an EDS; The plan makes provision for a type of change or variation in existing activity: generally, and may indicate a broad scale and / or one or more broad locations e.g. a particular part of the plan area, so a likelihood of a significant effect cannot be ruled out; The plan provides for ongoing management or maintenance activities which could affect an EDS; Options, policies or proposals that could block options or alternatives for the provision of other development or projects in the future, for example, by utilising land that would be needed to provide mitigation for another proposal that may otherwise lead to an adverse effect on an EDS, whose effects would have been avoided if the land had still been available; Options, policies or proposals the effects of which depend on how they are implemented in due course, for example, through the development or marine management processes. There is a more than theoretical possibility that if implemented in one or more particular ways, the proposal may have a significant effect on an EDS, and is not merely a general statement of policy; Any other proposals that would be vulnerable to failure under the Habitats Regulations at project assessment stage; to include them in the plan would be regarded by the European Commission as 'faulty planning'; and Any other proposal that may have an adverse effect on an EDS, which might try to pass the tests of the Habitats Regulations at project assessment stage by arguing that the plan provides the imperative reasons of overriding public interest to justify its consent despite a negative assessment. 	
J	Policy or proposal with an effect on a site but not likely to be significant alone, so need to check for likely significant effects in-combination	These include aspects of the Local Plan which would have some effect on a site, but the effect is unlikely to be significant in isolation. These must be checked for in-combination or cumulative effects, against K and L below.	Check categories K and L
K	Policy or proposal not likely to have a significant effect either alone or in-combination	Where an aspect of a Local Plan could have some effect on qualifying features of an EDS, but effects of that aspect of the Local Plan alone are unlikely to be significant, the effects of that aspect of the Local Plan must be checked for in-combination effects.	Screened in after the in-combination test
L	Policy or proposal likely to have a significant effect in-combination	<p>The 'in-combination' test, therefore, is about addressing cumulative effects. This should consider:</p> <ul style="list-style-type: none"> Can cumulative effects be eliminated from the assessment? What is the potential for cumulative effects? What is the type, timing and location of plans and projects? What is the approach to identifying, listing and gathering information about other plans and projects at appropriate stages? Can the effects of projects with potentially serious effects be excluded / is there a case to focus on the most influential plans or projects? Can the cumulative effects be considered to be significant? 	Screened in after the in-combination test
M	Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on an EDS		Screened in

Appendix 2 - Policy H1 modification assessment

Severn Estuary

Potential effect	AA conclusion	Impact of uplift of housing requirement	Change to AA conclusion
Habitats - Habitat Loss	As a result of Policy BG2, it is considered there is sufficient safeguarding in place to resist development within any EDS in the Plan area. No adverse effect on integrity to the Severn Estuary EMS from habitat loss.	Uplift of housing requirement does not impede the implementation of Policy BG2.	No change
Changes to hydrology – water quantity	Provided WRMP24 is delivered as is currently outlined in the Draft, there are no LSE expected from demand-side options, subject to appropriate project-level assessment and surveys	WRMP24 remains the appropriate management plan. Project level assessment and surveys remain applicable.	No change
Changes to hydrology – water quality	Potential impact mitigated by the requirements of Policy BG2. Subject to the effects on the Severn Estuary EMS from construction or operational impacts of supply-side options (P06 and P08) being managed appropriately at project-level to avoid AEoI	Residential development proposals would continue to be subject to appropriate project level assessment and construction environmental management plan measures to negate risks from construction	No change

<p>Air Pollution</p>	<p>Considered unlikely that any associated increase in traffic would adversely affect the integrity of the Severn Estuary EMS due to the minimal stretch of road in proximity to the EMS which is unlikely to be regularly used (as a result of residential development) given the industrial nature of this road/area. In addition, Policies T1, T2, T3A, T4A, T6 HW2 provide measures to further reduce traffic and facilitate lower emission modes of transport.</p>	<p>Uplift in housing numbers is unlikely to generate traffic on the stretch of road in proximity to the EMS due to the industrial surroundings of the road. Mitigation conclusions and recommendations apply.</p>	<p>No change</p>
<p>Recreational disturbance</p>	<p>There would be no adverse effect on integrity from increased visitors and recreational disturbance on the EMS. A calculation of theoretical potential visits is applied; however professional judgement is applied to the analysis on the basis that it is not implied that any visitors to the area within Avonmouth would necessarily cause disturbance to the Severn Estuary EMS features, and secondly,</p>	<p>Given the reasons for the conclusion of no adverse effect, the findings would also apply to the small additional theoretical visitations generated by the uplift figure</p>	<p>No change</p>

	<p>this area does not function as a destination for recreational visits and indeed is largely inaccessible.</p>		
<p>Potential Effects on Species – Habitat Loss</p>	<p>Policy H1 and the associated residential growth strategy is not identified as a policy which could cause potential for loss of EMS FLL. EoI from any loss of FLL to qualifying species of the EMS can be ruled out.</p>	<p>As the locations for residential growth as set out in the residential growth strategy are not identified as causing problems for the Loss of EMS, there is no identified pathway to harm as a result of the uplift to the figure</p>	<p>No change</p>
<p>Potential Effects on Species – Non-physical disturbance</p>	<p>AEoI can be ruled out from non-physical disturbance on species of the EMS.</p> <p>Policy H1 has the potential to result in development within 500m of the Severn Estuary EMS FLL (i.e. the River Avon) but embedded mitigation considered sufficient to resolve this</p>	<p>Uplift in housing requirement could result in more development within 500m of the Severn Estuary EMS FLL.</p> <p>However, embedded mitigation is still considered sufficient in managing harmful effects.</p>	<p>No change.</p>
<p>Potential Effects on Species – Changes to Hydrology</p>	<p>Potential impact mitigated by the requirements of Policy BG2. Subject to the effects on the Severn Estuary EMS from construction or operational impacts of supply-side options (P06 and P08) being managed appropriately at project-level to avoid AEoI</p>	<p>Uplift in housing numbers would continue to be subject to appropriate project level assessment and construction environmental management plan measures to negate risks from construction</p>	<p>No Change</p>

<p>Potential Effects on Species – Air Pollution</p>	<p>It is considered unlikely that any increase in emissions – with incorporation of the required project-level assessment and mitigation measures from Local Plan policies – could lead to a AEoI on the EMS from negative air quality effects.</p> <p>With incorporation of the required project-level assessment and mitigation measures from Plan policies, it is considered that AEoI from air pollutants on qualifying fish of the EMS can be ruled out.</p>	<p>While an uplift in housing numbers may generate an increase in emissions, the HRA concludes that any increase in emissions is unlikely to lead to an AEoI on the EMS with the incorporation of the required project-level assessment and mitigation measures.</p> <p>Project-level assessment and mitigation measures still apply.</p>	<p>No change</p>
<p>Potential Effects on Species – Recreational Disturbance</p>	<p>There is not considered to be a pathway for effect to the fish species of the EMS. It is therefore considered that there would not be an AEoI of the SAC from recreational disturbance as a result of increased visitor pressure from the Local Plan.</p> <p>The numbers of visitors accessing the coast are relatively modest given the distance of the residential developments from the coastline thus, with project-level</p>	<p>The uplift of the housing requirement does not change that there is not considered to be a pathway for effect to the fish species of the EMS.</p> <p>While the uplift of the housing requirement may result in a modest increase in visitors, it is not considered to be such a significant increase as to affect the HRA conclusion for the avian feature of the EMS.</p> <p>Project-level assessment and mitigation measures still apply.</p>	<p>No change</p>

	assessment and embedded mitigation, it can be considered that AEoI from recreational disturbance on avian feature of the EMS can be ruled out.		
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North Somerset and Mendip Bats SAC

Potential effect	AA conclusion	Impact of uplift of housing requirement	Change to AA conclusion
Potential Effects on Habitats - Habitat Loss	The Local Plan does not propose development within the North Somerset and Mendip Bats SAC directly, noting the SAC is 8.9km from the Bristol Local Plan area	The Local Plan, with the uplifted housing requirement, does not propose development within the North Somerset and Mendip Bats SAC directly.	No change
Potential Effects on Habitats - Air Pollution	It is acknowledged that there are Local Plan proposed policies and allocations which may indirectly increase traffic volumes and industrial emissions within the Plan area, and potentially outside the Plan boundary (namely those related to residential and industrial development, as well as Policy T2). Although there is no Local Plan or HRA specific traffic modelling undertaken for the Plan to confirm effects, it is considered unlikely that the combined effect of all development would	It remains unlikely that the combined effect of all development (including that proposed by the uplifted housing requirement) would have a significant negative effect on sensitive ecological receptors given the distance. It is considered that AEoI of the SAC can be avoided with adoption of the embedded mitigation.	No change

	have a significant negative effect on sensitive ecological receptors at this distance. It is considered that AEoI of the SAC can be avoided with adoption of the embedded mitigation.		
Potential effects on Species – Habitat Loss	AEoI from any loss of FLL to bat species of the SAC can be ruled out, given the requirement of Policy BG2	The uplift of the housing requirement does not affect the implementation of Policy BG2. As such it is not considered to impact the conclusion of the HRA	No change
Potential effects on Species – Physical Disturbance	With provision of project-level survey and assessment, consideration of the Local Plan policies, and noting the limited areas overlapping with suitable horseshoe habitat, AEoI to the SAC can be ruled out.	Potential effects on species via physical disturbance remain able to be dealt with at project-level	No change.

Chew Valley Lake SPA

Potential effect	AA conclusion	Impact of uplift of housing requirement	Change to AA conclusion
Changes to hydrology – water quantity	Options for supply management proposed by Bristol Water’s Water Resources Management Plan 2024 (WRMP24) that are indirectly connected to the Bristol Local Plan area do not constitute a risk of any AEoI on the Chew Valley Lake SPA’s designated features	The WRMP24 remains the appropriate management plan in relation to the Chew Valley Lake SPA.	No change

	from changes to water levels.		
Recreational Disturbance	Given the distance to the SPA and the small change in predicted visitor numbers, AEol from recreational disturbance can be ruled out.	The HRA concluded that the housing target as submitted would only result in a small change in visitor numbers. It can therefore be concluded that the uplift in housing requirement would have only a marginal effect on visitor numbers, meaning AEol from recreational disturbance can remain ruled out.	No change

Avon Gorge Woodlands SAC

Potential effect	AA conclusion	Impact of uplift of housing requirement	Change to AA conclusion
Habitats - Habitat Loss	Most residential development will be at some distance and located within the existing built-up area of the city and on previously developed land. Therefore, AEol from habitat loss to the SAC can be ruled out.	The location of residential development remains to be at some distance from the gorge and located within the existing built-up area of the city and on previously developed land	No change
Changes to hydrology – water quantity	Policy FR2 does not constitute a risk of any AEol on the Avon Gorge Woodlands SAC’s designated features from changes to the management of flood water dynamics, subject to appropriate project-level assessment and surveys	Uplift of housing requirement does not impact delivery of Policy FR2. Residual uncertainties remain able to be dealt with at project-level.	No change

Hydrology – Water Quality	The outcomes of the HRA for Wessex Water’s most recent Drainage and Wastewater Management Plan (DWMP) demonstrate that there will be no AEoI on the designated features of the Avon Gorge Woodlands SAC, subject to project-level HRA to resolve remaining uncertainties (particularly relating to impacts of construction)	The uplift in the housing requirement does not affect the outcomes of the HRA for Wessex Water’s most recent DWMP remain the same. Remaining uncertainties are still able to be dealt with at project-level	No change
Air Pollution	As allocations for the Bristol City Council Local Plan and Local Plans for adjacent local authorities are being developed, air quality impacts of increased traffic on the A4 within 200m of Avon Gorge Woodlands SAC will require further investigation in the form of traffic and air quality modelling and this will need to consider the effects of Local Plan growth alone and in combination with other plans and projects, including in adjacent local authorities. It is recommended that this further investigation is set out for ‘down-the-line’ investigation.	The effects of the Plan on air pollution with regard to Avon Gorge were assessed as requiring further investigation ‘down-the-line’. The uplift in housing requirement does not affect this conclusion, as further investigation remains necessary.	No change
Recreational Disturbance	It is unclear the degree to which the Local Plan in itself would exacerbate the	While the HRA attempts to calculate how the housing figure (as submitted) may impact	No change

	<p>pressures already experienced on the SAC. It can be concluded that the Local Plan in itself won't give rise to an AEoI. Measures included in the SIP to implement includes dealing with public access through engagement, management and interpretation.</p>	<p>the number of visits to the Avon Gorge SAC, it acknowledges that there are a number of factors that may prevent visiting such as the inaccessibility of large parts of the SAC. These factors remain unchanged with an increased housing requirement in Policy H1. Given this, it is considered that the outcome of the HRA remains the same inclusive of the uplift of the housing requirement. The HRA identifies that the measures set out in the SIP are the proper mechanisms to deal with any potential risks to the SAC. This remains the case with the uplifted housing requirement.</p> <p>(Policy DS4 includes a modification which addresses the proximity of the site in relation to the Avon Gorge).</p>	
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