

JOINT LOCAL TRANSPORT PLAN 4

MITIGATION REQUIREMENTS FROM THE STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

The SEA includes the following assessments within, which have their own mitigation requirements:

STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

HABITATS REGULATIONS ASSESSMENT (HRA) – APPROPRIATE ASSESSMENT

EQUALITIES IMPACT ASSESSMENT (EqIA)

HEALTH IMPACT ASSESSMENT (HIA) *(included within the SEA mitigations requirements section in the table below)*

Note: The following Mitigation Requirements have been extracted from the relevant assessments shown in the 1st column on the left

Assessment	Section of assessment	Assessment objective mitigation issue /	Mitigation Requirement	Change required? (and where)	Status
Strategic Environmental Assessment (SEA) – Non-Technical Summary	Table A: JLTP4 SEA Objectives, potential significant effects and mitigation	SEAO 1: 'Improve accessibility for a growing and aging population'	<p>1) There is a need to ensure that services and employment or education opportunities are accessible by those with limited mobility.</p> <p>2) Charging should not result in creating a barrier to employment or education opportunities, particularly for those who are unemployed or on low income.</p> <p>3) Strategic and major schemes will be delivered through the appropriate consenting process and will need to be subject to assessments including health and equalities assessments. Detailed mitigation and enhancement opportunities will be developed as part of the design and consenting process.</p>	<p>1) No change. Covered already – it is a given in any transport improvements.</p> <p>2) This sentence added to text about workplace parking levy & road user charging under policy W3, intervention: 'Use, as appropriate, measures to influence and manage the demand of private car use'</p> <p>3) This text has been added as part of a new opening paragraph to Appendix 4 (under the Major schemes details) under the title 'Important environmental equalities and health impact considerations for all JLTP4 Major Schemes'.</p>	<p>Changes copied into JLTP4 (9th January 2020)</p>

		SEAO 2: 'Reduce transport related air pollution'	<p>1) Public transport vehicles should be of high modern standards to utilise alternative fuels where possible and minimise emissions.</p> <p>2) Where schemes / initiatives are time limited, subsequent schemes should be implemented to ensure benefits over time.</p> <p>3) Promoting exposure reduction and ensure that any new road links are isolated from vulnerable receptors, would reduce the harmful effects of the policies promoting additional road links or upgrading local and strategic road network.</p> <p>4) Strategic and major schemes will be delivered through the appropriate consenting process and will need to be subject to Environmental Impact Assessment and other relevant environmental legislation. Detailed mitigation and enhancement opportunities will be developed as part of the design and consenting process at the scheme level.</p>	<p>1) Sentence added under Bus Strategy sub-heading under policy W1</p> <p>2) This is a given. LAs are aware of this and the lasting impacts of a scheme will be taken into consideration in the scheme development stages. No change.</p> <p>3) Sentence added after new text explaining the West of England approach to constructing new roads, under policy W3.</p> <p>4) Included as part of new opening paragraph to Appendix 4.</p>	<p>Changes copied into JLTP4 (9th January 2020)</p>
		SEAO 3: 'Reduce transport related carbon emissions in line with national targets'	<p>1) Public transport vehicles should be of high modern standards.</p> <p>2) Where schemes / initiatives are time limited, subsequent schemes should be implemented to ensure benefits over time.</p> <p>3) Strategic and major schemes will be delivered through the appropriate consenting process and will need to be subject to Environmental Impact Assessment and other relevant environmental legislation. Detailed mitigation and enhancement opportunities will be developed as part of the design and consenting process at the scheme level.</p>	<p>1) <i>All three actions here covered already under SEAO2 above</i></p> <p>2) <i>See above</i></p> <p>3) <i>See above</i></p>	<p>Changes copied into JLTP4 (9th January 2020)</p>
		SEAO 4: 'Adapt transport network to effects of climate change and minimise the vulnerability of transport network to flood risk'	<p>1) Strategic and major transport infrastructure schemes will have to be designed to take into the effects of climate change in line with national policy and best practice design.</p> <p>2) Additionally, all strategic and major schemes will be delivered through the appropriate consenting process and will be subject to Flood Risk Assessment and Environmental Impact Assessment. Detailed mitigation and enhancement opportunities will be developed as part of the design and consenting process at the scheme level.</p> <p>3) Use of information regarding weather conditions and impact on travel can benefit transport users.</p>	<p>1) Included as part of new opening paragraph to Appendix 4.</p> <p>2) <i>Same as above</i></p> <p>3) Travel planning is covered in the JLTP4 already, including planning your journey in advance of departure. Suggest no change.</p>	<p>Changes copied into JLTP4 (9th January 2020)</p>
		SEAO 5: 'Protect and enhance biodiversity and	<p>1) The West of England (WoE) Joint Spatial Plan commits the authorities to develop a WoE Green Infrastructure Plan and to delivering a 'net gain' for the environment.</p>	<p>1) <i>Covered already under text on GI Strategy</i></p>	<p>Changes copied into JLTP4 (9th</p>

		ecological networks'	<p>2) The Green Infrastructure Plan, currently under preparation, will identify the strategic measures and mechanisms to support, guide and implement the delivery of environmental commitments set within the Joint Spatial Plan and Local Plans, including mitigation for protected sites. Further development of GI Plans at an authority level should also reflect schemes within this JLTP.</p> <p>3) All strategic and major schemes will be delivered through the appropriate consenting process and will be subject to Environmental Impact Assessment and relevant environmental mitigation. Detailed mitigation and monitoring measures will be developed as part of the Environmental Impact Assessment process. It is recommended that major schemes have a Construction Environmental Management Plan.</p> <p>4) Further assessment under the 'Habitats Regulations' provides further information with regards to mitigation associated with potential significant effects on European sites.</p>	<p>2) Small section of text added under Joint Green Infrastructure Strategy subheading in section 1: Setting the scene.</p> <p>3) <i>Already covered as part of new opening paragraph to Appendix 4.</i></p> <p>4) <i>No change required – covered by HRA mitigation requirements, already added to JLTP4</i></p>	<p>January 2020)</p>
		SEAO6: 'Promote human health'	<p>1) All strategic and major schemes will be delivered through the appropriate consenting process and will be subject to Environmental Impact Assessment which includes assessment of health. Detailed mitigation and monitoring measures to minimise potential adverse effects will be developed as part of the Environmental Impact Assessment process.</p> <p>2) Enhancement opportunities should also be considered as part of the development and consenting process of the larger schemes.</p> <p>3) Any charging scheme should consider exemptions for drivers with specific need, those on low income or unemployed seeking access to employment or education opportunities.</p>	<p>1) <i>Already covered as part of new opening paragraph to Appendix 4.</i></p> <p>2) <i>Same as above</i></p> <p>3) <i>Covered above, under SEAO1, under point 2)</i></p>	<p>Changes copied into JLTP4 (9th January 2020)</p>
		SEAO7: Improve road safety, particularly for vulnerable users, and to reduce road casualties'	<p>1) Where schemes / initiatives are time limited, new replacement measures need to be implemented to maximise the opportunity for benefits over time.</p> <p>2) Road safety camera enforcement provides opportunity for driver education. Targeting road safety campaigns at motorcyclist safety. Motorcyclists are disproportionately represented in road accident statistics.</p> <p>3) New projects should be subject to safety audit checks and aim to improve road safety through design.</p>	<p>1) <i>Covered above under SEAO2 under point 2)</i></p> <p>2) Text added under policy W2, under intervention 'Recognise the needs of motorcycle and moped users'</p> <p>3) New schemes are already subject to safety audit checks as part of current best practice processes. Covered in road</p>	<p>Changes copied into JLTP4 (9th January 2020)</p>

				safety section already and road safety audits have their own intervention. No change to document.	
		SEAO8: Minimise adverse effects on soils such as loss, compaction, erosion and pollution from transport-related activities'	<p>1) As noted under SEAO 5 above, further development of GI Plans at an authority level should also reflect schemes within this JLTP.</p> <p>2) All strategic and major schemes will be delivered through the appropriate consenting process and it is recommended that major schemes have a Construction Environmental Management Plan. This would include mitigation and monitoring measures to avoid and minimise the degradation of soil resources.</p>	<p>1) Small section of text added under Joint Green Infrastructure Strategy subheading in section 1: Setting the scene.</p> <p>2) Text added to new opening paragraph to Appendix 4.</p>	Changes copied into JLTP4 (9th January 2020)
		SEAO9: 'Protect, and where possible improve, water quality'	<p>1) Detailed design should follow best practice guidance such as that provided within CIRIA Report C753 <i>The SuDS Manual</i>. The guidance covers the planning, design, construction and maintenance of Sustainable Drainage Systems to assist with their effective implementation within both new and existing developments. It looks at how to maximise amenity and biodiversity benefits, and deliver the key objectives of managing flood risk and water quality.</p> <p>2) As noted under SEAO 5 above, further development of GI Plans at an authority level should also reflect schemes within this JLTP.</p> <p>3) All strategic and major schemes will be delivered through the appropriate consenting process and will be subject to Environmental Impact Assessment and relevant environmental mitigation. Detailed mitigation and monitoring measures will be developed as part of the Environmental Impact Assessment process. It is recommended that major schemes have a Construction Environmental Management Plan.</p>	<p>1) Text added to new opening paragraph to Appendix 4.</p> <p>2) <i>Already covered under SEAO5, point 2)</i></p> <p>3) Text added to new opening paragraph to Appendix 4.</p>	Changes copied into JLTP4 (9th January 2020)
		SEAO10: 'Minimise waste produced and resources consumed by transport infrastructure and operation of transport services'	<p>1) Seek to make best use of existing infrastructure to minimise resource consumption and waste generation before constructing new facilities.</p> <p>2) Ensure scheme design incorporates sustainable use of materials as well as measures to minimise future maintenance requirements.</p> <p>3) For construction projects, a Site Waste Management Plan should be implemented. New development can be designed to increase the potential for recycling waste.</p> <p>4) New transport modes should use sustainable fuels (electric). There should also be modal shift to public transport and active travel from car use.</p>	<p>1) Text added to new opening paragraph to Appendix 4.</p> <p>2) <i>Same as above</i></p> <p>3) <i>Same as above</i></p> <p>4) <i>This is a strong theme throughout the JLTP4. No changes required.</i></p>	Changes copied into JLTP4 (9th January 2020)

		<p>SEAO11: Protect and enhance the rich diversity of the historical and cultural environment, its heritage assets and their setting'</p>	<p>1) The JLTP provides an opportunity to improve the setting and integrity of the WoEs historic places, and ensure future development is appropriately considered and designed to respond to local context.</p> <p>2) Good design (following best practice guidance such as Highways England – the road to good design (2018)), and cultural heritage assessments (as part of Environmental Impact Assessment where appropriate) should be required for all strategic and major schemes to minimise potential adverse impacts and maximise opportunities for benefits.</p>	<p>1) No changes required</p> <p>2) Text added to new opening paragraph to Appendix 4.</p>	<p>Changes copied into JLTP4 (9th January 2020)</p>
		<p>SEAO12: Maintain and enhance the quality and character of the built environment and landscape'</p>	<p>1) Good design (following best practice guidance such as <i>Highways England – the road to good design</i> (2018)), and landscape/townscape and visual assessments (as part of Environmental Impact Assessment where appropriate) should be required in all strategic and major schemes to minimise potential adverse impacts and maximise opportunities for benefits.</p> <p>2) Design the proposed infrastructure sensitively to reduced visual impact and to include effective landscaping scheme to soften any major structures.</p> <p>3) It is recommended that signage and infrastructure for pedestrians and cyclists is designed to be sympathetic to the local distinctiveness whilst remaining clear, visible and informative.</p> <p>4) Further development of The West of England's GI Plans at an authority level should also reflect schemes within this JLTP. A modal shift away from car use is needed to maximise the potential beneficial impacts of JLTP4 on this SEA objective.</p> <p>5) Measures to discourage car use within urban centres should be pursued to maximise use of alternative modes provided and to reduce traffic congestion and noise.</p>	<p>1) Text added to new opening paragraph to Appendix 4.</p> <p>2) Text added under policy N1 (after Bristol public realm improvements case study box)</p> <p>3) Text added under policy N1 under sub-heading 'Provide clear wayfinding and signage'</p> <p>4) <i>Already covered under SEAO5, point 2)</i></p> <p>5) <i>Already covered sufficiently in plan. No change.</i></p>	<p>Changes copied into JLTP4 (9th January 2020)</p>
<p>Habitats Regulations Assessment (HRA) – Appropriate Assessment</p>	<p>5.4.3 Mitigation summary</p>	<p>Various (strategic level)</p>	<p>In summary, it is recommended that the JLTP4 includes the following mitigation principles:</p> <ul style="list-style-type: none"> All schemes within the JLTP4 need to avoid the Juvenile Sustenance Zones around the horseshoe maternity roosts within the SACs; HRA of the WoE Local Plans to use the strategic bat survey results to produce horseshoe bat mitigation strategies which would show the key bat foraging/commuting habitats in their areas. These bat 	<p>Make change? YES</p> <p>Add to new list under Appendix 4 under the Major Schemes details tables</p>	<p>Changes copied into JLTP4 (10th Dec.)</p>

			<p>habitats would inform the location and design of the schemes thereby ensuring a co-ordinated approach to the planning of the schemes within the JLTP4 and SDLs proposed within the JSP;</p> <ul style="list-style-type: none"> • A project level HRA would be required for the schemes listed in Tables 5.2 and 5.3 [see <i>below list of schemes</i>]. These HRAs should include a Horseshoe Bat Mitigation Plan, which would be informed by the results of the detailed bat survey of each scheme undertaken in accordance with the SPD survey methodology. The Horseshoe Bat Mitigation Plan would include suitable horseshoe bat crossing points to enable bats to cross the roads and commute through the landscape. The crossing points must have the following features designed in accordance with best practice: <ul style="list-style-type: none"> a) Underpasses to be of sufficient height to allow horseshoe passage; b) Crossing structures to maintain connectivity with existing bat commuting routes; c) Crossing structures to be unlit. <p><i>These schemes are: Bristol City Centre to Airport (T1); Local improvements to road network in Nailsea area (G4); Nailsea - Backwell A370 link (G4); M5 J19 & J20 improved multimodal connections (G4); A371 / A368 Banwell Bypass (G5); BSWEL Package 4: A38 (south) offline improvements (E1); M5 Junction 19 (E3); MetroWest Phase 1 (C3); M5 J21A (E5); Bristol City Centre to Bath (T2); Bath city centre and corridors (T5); A4-A4175 Link (G2); East of Bath Link (E2); Park & Ride package for Bath (includes at Odd Down, Lansdown and Newbridge) (E13); Keynsham / Midsomer Norton and Somer Valley Public Realm Improvements Packages (E17).</i></p> • The project level HRA of the schemes listed in Tables 5.2 and 5.3 [see <i>schemes above</i>] should also use the metric for calculating replacement horseshoe bat foraging habitat as detailed in the North Somerset Bats SAC SPD (or any subsequent updated editions). This metric would be used 	<p>Important considerations for all JLTP4 Major Schemes: The Appropriate Assessment stage of the JLTP4 Habitats Regulation Assessment (HRA – part of the Strategic Environmental Assessment) has identified a number of mitigations and considerations required to be made in major scheme development. This is so that the JLTP4 can be concluded that no adverse environmental effects are likely from the full major schemes programme (except for MetroWest Phase 1, see Section 13 for details). These are as follows:</p> <p><i>[The text on the left is then copied as a list]</i></p>	
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			<p>to demonstrate that the schemes would result in a net gain in horseshoe bat habitat by retaining/enhancing habitat within the proposed scheme and provided off-site if lost; and</p> <ul style="list-style-type: none"> The JLTP4 schemes would only be granted permission and allowed to go ahead if the HRAs of the Local Plans and proposed schemes are able to demonstrate that there would be no adverse effect on the integrity of the North Somerset and Mendip Bats SAC and the Bath and Bradford-on-Avon Bats SAC either alone or in combination. 		
Habitats Regulations Assessment (HRA) – Appropriate Assessment	6.6 Mitigation requirements (Loss of Supporting Sites for Birds)	Loss of Supporting Sites for Birds (WsM to Clevedon cycle route)	The current proposals for the Weston-super-Mare to Clevedon section of the North Somerset Towns Coastal Cycle Route, adjacent to Weston-Super-Mare, shows the route occurs directly adjacent the Severn Estuary SPA and Ramsar. This could potentially result in the loss of habitat used by birds, particularly waders. It is understood that the proposed route is indicative at this stage and therefore without further information there is a risk of an adverse effect on the integrity of the Severn Estuary SPA and Ramsar site. A project level HRA would therefore be required to screen the potential effects of this scheme once further details are available. If an LSE is screened-in during a project level HRA then an Appropriate Assessment should be undertaken. This project level Appropriate Assessment would need to demonstrate that no adverse effects will occur on this European Site before the scheme is granted permission and allowed to go ahead. The Appropriate Assessment should include moving the route away from sensitive habitat used by bird populations associated with the estuary.	<p>Make change? YES</p> <p>Add the text in the box to the left to:</p> <p><i>Wherever the ‘North Somerset Coastal Towns Cycle Route’ text gets moved to. This is currently on p73, S8.</i></p> <p>Add a new ‘HRA Mitigation’ text box in green font to the section of text below ‘North Somerset Coastal Towns Cycle Route’</p>	Changes copied into JLTP4 (10th Dec.)
Habitats Regulations Assessment (HRA) – Appropriate Assessment	8.4.1 Strategic Mitigation (Increase in Recreational Pressures)	Various	The strategic approach to addressing recreational pressures within the WoE resulting from the growth proposed in the JSP will involve a package of solutions listed below. They are considered to be tried and tested methods, which have been utilised elsewhere. The list of solutions should not be seen as exhaustive, as other opportunities may come to light through work begun in tandem	<p>Make change? NO</p> <p>Proposed no changes to JLTP4 text. These are strategic level mitigations that are for inclusion in</p>	Changes not made

		<p>with the JSP and GI Strategy that will continue through Local Plan preparation. The detail and extent of each method will be reviewed through the West of England GI Strategy for inclusion in the authorities' Local Plans.</p> <p>1) Maximising integration of open space within SDLs The process of designing open space within individual SDLs is to be taken forward and delivered through the four authorities' new Local Plans. Specific requirements for green infrastructure provision is set out in each SDL policy, and the JSP HRA Report has also recommended that a more general requirement is included in the JSP to ensure that all new development makes sufficient provision of accessible green spaces, to ensure that any increase in recreational pressure on European sites identified through the JSP HRA is mitigated.</p> <p>Sufficient provision would need to be defined through Local Plans and meet the relevant unitary authority's standards in regard to access, quality and quantity of green space, and reflecting the outputs of the Local Plan HRAs. The inclusion and integration of open space and green infrastructure will be implemented through Masterplanning of the strategic development locations.</p> <p>Although it is unlikely that provision of open space within SDLs will completely attract new residents away from the nearby European sites, it is likely to divert a large proportion of the daily recreational visits (e.g. walkers and dog-walkers) by providing space for these activities on their doorstep. It is considered that this approach would make a significant contribution towards reducing the recreational pressures on those European sites listed above.</p> <p>2) Use of Suitable Alternative Natural Greenspace (SANG) to alleviate pressures on sensitive sites 'Suitable Alternative Natural Greenspace' is the name given to green space that is of a quality</p>	<p>Local Plan and strategic development planning. Nothing explicitly related to JLTP4 major schemes.</p>	
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			<p>and type suitable to be used as mitigation for recreational pressures on particular European sites.</p> <p>The role of SANGs is to provide alternative greenspace to divert visitors from European sites and reduce the potential impact of residential development on European sites by preventing an increase in visitor pressure. The effectiveness of SANGs as mitigation will depend upon the location and design, which must be such that the SANG is equally as attractive as the European site(s) to users of the kind that currently visit European sites.</p> <p>This approach is used by a growing number of local authorities to deliver avoidance and mitigation for recreational impacts on designated sites where visitor surveys and monitoring of qualifying habitats and species identifies a need. In most cases, the approach funds the creation and maintenance of SANGs. Examples of this include:</p> <ul style="list-style-type: none"> • Thames Basin Heaths SPA (Surrey Heath Borough Council) • Ashdown Forest SPA (Mid Sussex District Council) • Dorset Heathlands SPA (the South East Dorset authorities) • Bird Aware Solent (Solent Recreation Mitigation Partnership). This uses rangers to help people understand the issue of recreational disturbance and inspire them to act themselves to reduce their impact. A partnership approach funded through local growth deal funding. <p>As discussed below, visitor surveys will determine zones of influence within which developer contributions could be required and size and scale of SANGs needed and these surveys are currently underway.</p> <p>3) A strategic approach to recreation mitigation through developer contributions, zones of influence and site management (including wardening and opportunities to improve education)</p>		
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			As part of preparing the WoE GI Strategy, and in addition to the above, recreational visitor surveys and distance mapping of travel patterns will be undertaken where required to understand visitor travel patterns to European sites. This work will inform a requirement for developer contributions to be made on development sites that fall within those travel zones to offset/mitigate the potential impacts of development, in line with the precautionary approach.		
Habitats Regulations Assessment (HRA) – Appropriate Assessment	8.4.2 Mitigation - (Increase in Recreational Pressures)	Cycleways & individual HRAs	<p>The proposed cycleways within the JLTP4 are indicative at this stage and yet to be finalised. It is therefore not possible to fully assess the potential environmental effects of each route. Some cycle routes will be included within the Cycling and Walking Infrastructure Plan. It is therefore recommended that an HRA of the Local Cycling and Walking Infrastructure Plans would ascertain the predicted level of use of new cycle routes in the WoE and therefore more accurately predict the potential for an adverse effect on the European sites identified and be able to put forward suitable mitigation.</p> <p>The Interurban cycle routes which form part of scheme E9 will not be included within the Cycling and Walking Infrastructure Plan. It is therefore proposed that the potential effects of recreational pressures resulting from the following cycle routes are assessed through project-level HRA of the individual schemes, as well as a separate HRA of the WoE Local Cycling and Walking Infrastructure Plan:</p> <ul style="list-style-type: none"> • Strawberry Line Cycle Route (Interurban Cycle Routes - E9); • Weston Town Centre to J21 Cycle Route (Weston-super-Mare: Local walking & cycling infrastructure improvements – LP5); • Banwell - Churchill Cycle Route (Banwell and Churchill: Sustainable travel package - G5); and • North Somerset Coastal Cycle Route, particularly the WSM to Sand Bay and Sand Bay to Clevedon sections (Interurban Cycle Routes - E9). 	<p>Make change? YES</p> <p>Propose to create new text box on p73 (S8) after discussion of the Interurban Cycle Routes. New text box to be titled ‘Protecting & enhancing natural environment with Interurban Cycle Routes’ and to include all text to the left.</p>	<p>Changes copied into JLTP4 (10th Dec.)</p>

			<p>It is recommended that the requirement for HRA of individual cycle route schemes is included within the JLTP4. If an LSE is identified in screening during the project level HRA then an Appropriate Assessment should be undertaken and schemes should only be granted permission and allowed to go ahead if the Appropriate Assessment is able to demonstrate that there would be no adverse effects on these European sites, either alone or in combination with other plans and projects. The Appropriate Assessment should input into the design and location of the cycleways as appropriate. There is also an opportunity for the cycleways to provide linkages as a part of the local green infrastructure networks and it is recommended that this opportunity if referred to within the JLTP4.</p> <p>It is also assumed that all cycleways will eventually be incorporated into Local Plans as part of infrastructure delivery. Local Plans will be subject to their own HRAs and new cycleways will be considered within the HRAs along with other developments. Through their HRAs, the Local Plans of the WoE authorities would need to demonstrate that there would be no adverse effect on the North Somerset Bats SAC and the Severn Estuary SPA, SAC and Ramsar as a result of the transport schemes before the plans are adopted.</p>		
Habitats Regulations Assessment (HRA) – Appropriate Assessment	9.5 Mitigation requirements - Water Pollution and Marine Litter	Water pollution – Severn Estuary & schemes affecting this	<p>A risk of an adverse effect on the integrity of the Severn Estuary has been identified due to water pollution and litter during scheme construction. It is therefore recommended that the JLTP4 states that any scheme which has the potential to have an adverse impact on the water quality of the Severn Estuary during construction should ensure that best practice pollution prevention guidelines are followed, including adherence with the following CIRIA guidance documents to manage construction run-off:</p> <ul style="list-style-type: none"> • CIRIA C532 (2001). Control of water pollution from construction sites. Guidance for consultants and contractors; 	Make change? YES Add to Appendix 4 after Major schemes details (Major schemes) under new list: 'Important considerations for all JLTP4 Major Schemes'	Changes copied into JLTP4 (10th Dec.)

			<ul style="list-style-type: none"> • CIRIA C648 (2006) – Control of Water Pollution from Linear Construction Projects; and • CIRIA C692 (2010) – Environmental Good Practice on site. 3rd Edition. <p>Where a risk of an adverse effect on the integrity of the Severn Estuary has been identified due to water pollution and litter during scheme, this could be mitigated by incorporating interceptors into the scheme design to trap the silt, oil and other possible contaminants in run-off to prevent pollution and degradation of the downstream habitats. This should be designed in accordance with current best practice, including adherence to the DMRB Volume 11 Section 3 Part 10 HD 45/09 Road Drainage and the Water Environment.</p> <p>The schemes that this applies to are: Bristol City Centre to North Fringe (T4) Local improvements to road network in Nailsea area (G4) M5 J19 & J20 improved multimodal connections (G4) A371 / A368 Banwell Bypass (G5 / E21) A368 Churchill and Sandford Bypass (G5) A4 Portway Park & Ride expansion (G7) M49 Avonmouth Junction Upgrade (C1) M5 Junction 19 (E3) Pill Station (E4) M5 J21A (E6)</p>		
Habitats Regulations Assessment (HRA) – Appropriate Assessment	10.5 Mitigation requirements (Physical Modification of Watercourses)	Schemes affecting Severn Estuary	<p>A risk of an adverse effect on the integrity of the Severn Estuary has been identified due to physical modification of watercourses potentially used by fish species associated with the Severn Estuary SAC and Ramsar. It is therefore recommended that the JLTP4 states that any scheme which crosses a watercourse linked to the Severn Estuary should ensure it does not result in a barrier to fish passage by ensuring crossing points are designed and constructed in accordance with best practice guidance, including adherence to the Environment Agency Fish Pass Manual (2010).</p> <p>These schemes are:</p>	Make change? YES	<p>Add the text to the left to the new list on p121 (Appendix 4) Major Schemes section ('Important considerations for all JLTP4 Major Schemes')</p> <p>Changes copied into JLTP4 (10th Dec.)</p>

			<p>Bristol City Centre to North Fringe (T4) Local improvements to road network in Nailsea area (G4) M5 J19 & J20 improved multimodal connections (G4) A371 / A368 Banwell Bypass (G5) A368 Churchill and Sandford Bypass (G5) M5 J21A (E6)</p>		
Habitats Regulations Assessment (HRA) – Appropriate Assessment	11.3 Mitigation and compensation requirements (Habitat loss)	MetroWest & loss of woodland at Avon Gorge	<p>The MetroWest Phase 1 project level HRA proposes a series of mitigation measures, including implementing protective measures during scheme construction which would reduce the adverse effects on the Avon Gorge Woodlands SAC. However, it is not possible to avoid the loss of up to 0.71 ha of woodland within the SAC and therefore an adverse effect on this SAC remains following mitigation.</p> <p>The project level HRA has therefore proceeded to evaluate the alternatives to the MetroWest Phase 1 scheme, however, it has not been possible to identify any feasible alternatives to this scheme. It is therefore necessary for this scheme to advance to the 'IROPI test' (imperative reasons of overriding public interest). The IROPI that have been considered within the project level HRA relates to human health, public safety and important environmental benefits. Compensatory measures are also provided within the project level HRA, including habitat management and planting of additional woodland with whitebeams. However, as a result of the European Court of Justice interpretation of the Habitats Directive, these measures cannot be taken into account in the assessment of the implications of the project.</p>	<p>Make change? YES</p> <p>Add new paragraph to either p49 (S7) under the MetroWest text OR into the C3 MetroWest scheme box in Appendix 4 p164. Text to be titled: 'Protecting & enhancing the environment with MetroWest Phase 1' <i>and then include all text in box to the left</i></p>	<p>Changes copied into JLTP4 (10th Dec.)</p>
Habitats Regulations Assessment (HRA) – Appropriate Assessment	12.3 Mitigation requirements (Other Schemes with Uncertain Effects)	HRAs for uncertain schemes	<p>It is recommended that the JLTP4 states that all of the schemes listed in Table 12.1 are subject to project-level HRA when sufficient information is available. If an LSE is screened-in during the project level HRA then an Appropriate Assessment should be undertaken. The Appropriate Assessment should input into the design and location of the schemes to ensure no adverse effect on European sites occur. Permission should only be granted and schemes allowed to go ahead if the Appropriate Assessments are able to conclude that no adverse effects will</p>	<p>Make change? YES</p> <p>Appendix 4, Major schemes textboxes. In the following major schemes text boxes, add this sentence:</p>	<p>Changes copied into JLTP4 (10th Dec.)</p>

			<p>occur on European sites. It is recommended individual Interurban cycle routes (E9) are subject to HRA screening in order to ensure that any potential effects on European sites from recreation pressure and loss of supporting sites for birds are identified, assessed and mitigation put in place to avoid adverse effects.</p> <p>Table 12.1 schemes: Bristol walking and cycling package (G7) BSWEL: Package 6: Rail options: Bristol Airport Rail Link Phase One (E1) BSWEL: Package 7: Rail options: Bristol Airport Rail Link Phase Two (E1) BSWEL: Package 8: A370-A38 Link (E1) Interurban cycle routes (E9) Strategic Rail and Road Freight Package (L1)</p>	<p>'The JLTP4 HRA recommends that this scheme is subject to a project-level HRA when sufficient scheme information is available. If a Likely Significant Effect (LSE) is screened-in during the project level HRA then an Appropriate Assessment should be undertaken. The Appropriate Assessment should input into the design and location of this scheme to ensure no adverse effect on European sites occur. Permission should only be granted and this scheme allowed to go ahead if the Appropriate Assessment are able to conclude that no adverse effects will occur on European sites'. Bristol walking and cycling package (G7) BSWEL: Package 6: Rail options: Bristol Airport Rail Link Phase One (E1) BSWEL: Package 7: Rail options: Bristol Airport Rail Link Phase Two (E1) BSWEL: Package 8: A370-A38 Link (E1) Interurban cycle routes (E9) Strategic Rail and Road Freight Package (L1)</p>	
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Equalities Impact Assessment (EqIA)	Section 5.3.3. – Assessment Summary	W2: Provide for journeys where public transport is not an option	The proposed plan should incorporate easy access for people with disabilities at the Park and Ride sites and public transport interchanges for onward journeys.	No change. Equality Act-compliant infrastructure is already part of the scheme design process. All existing park & ride sites in the West of England are also compliant and accessible for people with disabilities. Due to this being covered in scheme design, suggest no change	No change
		W3: Use, as appropriate, technological advances and charging measures to optimise and better manage demand	<p>1) People with disabilities who are car reliant would be affected by charging measures. Travelling costs to major areas (for employment, education or health services) would be increased where alternative options are unavailable for this equality group. The proposed plan should consider exemptions for private car drivers with specific needs.</p> <p>2) Care should be made to ensure groups unable, or unwilling, to use technology are not excluded from receiving information about their planned journeys;</p>	<p>1) As part of SEAO1 in first row of this page, this sentence has already been added to text about workplace parking levy & road user charging under policy W3, intervention: <i>'Use, as appropriate, measures to influence and manage the demand of private car use'</i></p> <p>2) No change. Already covered under the 'Improve the availability and accessibility of accurate travel information and ticketing' sub-heading. It states that <i>'Information provided in leaflets, timetables, at libraries, leisure sites, large healthcare sites, major supermarkets and transport hubs, will ensure those who cannot access information online can still get the information they require'</i>.</p>	Changes copied into JLTP4 (9th January 2020)
		L1: Enable walking and cycling "active modes of	The plan should ensure that alternative travel means for people with disabilities are considered and that the promotion of active travel does not limit their travel options. This includes in new developments, where all levels of mobility must be catered for.	New sentence added under 'Integrate walking, cycling and public transport into new developments' sub-heading.	Changes copied into JLTP4 (9th

		travel”, to be the natural choice for shorter journeys			January 2020)
		L3: Encourage residents and employees to make more sustainable and healthier travel choices	The plan may consider improving or increasing services of public transport which are likely to be utilised by the elderly and people with mobility issues.	No change – already covered in sections about improving public transport connections in rural areas and also the increasingly important role of community transport and first & last mile solutions	No change
		N1: Use master planning and local design to create better places	The plan should ensure that alternative travel means for people with disabilities are considered and that the promotion of active travel does not limit their travel options. This includes in new developments, where all levels of mobility must be catered for. Public realm should be designed for the needs of all users.	Change already made as part of response to mitigation against policy L1 (two rows above)	Changes copied into JLTP4 (9 th January 2020)
		N2: Facilitate the use of active modes for all short trips, including the first and last mile of longer journeys	Plans should consider the needs of people with limited mobility and ensure that neighbourhood facilities are accessible to all users, as well as acknowledge the potential for localised racial or faith-based hate crime.	No change. The plan already promotes the inclusivity of people limited mobility with neighbourhood facilities and universally. Although the provision of security measures including CCTV and lighting will likely deter general crimes, but may not influence crimes that are race or faith orientated (according to EqIA), it is difficult to see what transport policies or measures will affect this potentially adverse outcome.	No change