

Table B.1 – Scoping Report February 2008: Summary of Consultation Responses

Issue Considered	Comment	Response
Comments from Natural England received 16 th March 2008		
V, 2.13, 2.18 & 5.15	The Emerson's Green route is described as a disused railway but for nearly 30 years it has been a popular cycle path.	Amend reference in text re: current use and ensure consistency throughout the report.
	This railway corridor has since been designated as a Greenway, Open Space and Site of Nature Conservation Interest.	Clarify the reference in the text.
Ix	It is good that the report acknowledges alternative alignments should be supported to protect biodiversity.	Noted.
2.12	The locations listed for the city centre stops do not correlate with the route shown in Appendix A.	Check for consistency: amend as appropriate.
6.18	The survey area for Great crested newts should take into account the network of habitats formed by private gardens adjacent to the routes. There is potential for further numbers of Great crested newts to be supported by garden ponds.	Specialist team to clarify rationale for Study Area definition and amend them as appropriate.
6.40	Will a strategy for the removal of Japanese Knotweed be part of the proposal?	Recommendations at this level of detail will be made at the next stage of assessment, most likely as part of the mitigation
10.13	Does removing or amending the section of railway also refer to the railway between the site of the Industrial Museum and the SS Great Britain? The steam train on this line is a popular feature at major social and cultural events and does also run regularly during summer holidays. If so then the frequency of use may be recorded inaccurately.	The route for the steam train will be safeguarded as part of the proposals. Add clarification to the text.

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Appendix A - A1 & A2	The Ordnance Survey 1:25000 map may be out of date as it shows a Science Centre at Bristol Temple Meads which closed approximately 8 years ago. Please check if a newer version is available.	Source for mapping to be revisited. Replace if possible. Alternatively add date of source map.
Route maps	The text on the route alignment maps is blurred and hard to read.	Improve map clarity if possible.
ix	The maps in Appendix A show the Emerson's Green alignment does propose to cross one waterway over the River Avon at Bristol Temple Meads which contradicts Paragraph ix.	Check for consistency: amend as appropriate.
General	Natural England holds concerns for the proposal for the Emerson's Green route. As well as having a significant adverse effect on the reasons why it has been designated as a Greenway, Open Space and Site of Nature Conservation Interest it could also be detrimental to the promotion of walking and cycling. Natural England promotes walking to improve the health and wellbeing of the community through the Walking the Way to Health Initiative (WHI). Cycling and walking is a good alternative to the car and this proposal may limit the use of such activities.	Noted. These comments will be reflected in the next stage of assessment as appropriate.
Comments from Bristol City Council received 31 st March 2008		
	My comments on the likely effects of the proposed routes on biodiversity will be of a general nature, as I had difficulty reading the detail on the PDFs provided, due to pixilation at increased magnification. This means, in particular, that I am unable to comment in detail on changes in infrastructure along the routes.	Improve map clarity if possible.

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<p>Accuracy and completeness of the information contained in the report</p> <p>Based on data from MAGIC website and extended Phase One Habitat Survey:</p>	<p style="text-align: center;">Ashton Vale to Bristol City Centre</p> <p>Identifies one SAC and NNR within 5km (Avon Gorge Woodlands), with potential for impact during the construction phase</p> <p>Identifies two SSSIs within 2km (Avon Gorge and Ashton Court Estate): the latter, while not in Bristol, is owned and managed by the City Council. Potential for impact during the construction phase identified.</p> <p>Identifies four SNCIs within 500m: Ashton Vale Fields, Bower Ashton Mineral Railway, River Avon, Ashton Court Estate. I believe Colliters Brook SNCI will also be affected by this route.</p>	<p>Scoping Report assessment was prepared as an update to the Initial Scoping Study on the assumption that the data was accurate.</p> <p>The next stage of assessment will include an update to the desk based work, including revisiting data sources. Inaccuracies will be identified and corrected as appropriate.</p>
	<p style="text-align: center;">Bristol City Centre</p> <p>Identifies the following within 500m: Brandon Hill SNCI and RIGS, Castle Park RIGS, Phoenix Wharf RIGS, Redcliffe Cave RIGS and Alfred Quay Phoenix Wharf RIGS. Hawkfield Meadows SNCI is also listed in error: this is in South Bristol, near Hengrove Park.</p>	<p>Scoping Report assessment was prepared as an update to the Initial Scoping Study on the assumption that the data was accurate.</p> <p>The next stage of assessment will include an update to the desk based work, including revisiting data sources. Inaccuracies will be</p>

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	<p>Emerson's Green to Bristol City Centre</p> <p>Identifies the Easton-Staple Hill Disused Railway SNCI as a key environmental issue, together with two LNRs within 2km (Royate Hill LNR and Troopers Hill LNR), and Coombe Brook Valley and The Lido SNCIs within 500m.</p> <p>Section 6.26 of the report identifies the alignment as passing directly through Royate Hill LNR, although this does not correspond with Plan A14, which shows the route following the existing disused railway path. This needs clarification.</p>	<p>identified and corrected as appropriate.</p> <p>The route does not pass through Royate Hill LNR. Plan A14 to be corrected.</p>
6.60 – 6.64	<p>The potential impacts on protected sites and species are recognised in 6.60 and 6.61. The potential mitigation measures are laid out in 6.62, ranging from avoidance of sites to safeguards and compensation. The potential gains for biodiversity through landscaping and management are mentioned in 6.63.</p> <p>I am pleased to note the acknowledgement of social factors in recognition of Local Sites in 6.64. In Bristol and the surrounding counties of B&NES, South Gloucestershire and North Somerset this has been recognised in the criteria adopted for designation of Local Sites, following the Collis & Tyldesley guidance.</p>	Noted.
Proposed scope of the next stage of assessment work	<p>We would expect any large-scale development proposal such as this to utilise data held by BRERC: the local environmental records centre. It is not clear from the report whether this has been done (although data obtained from BRERC is referred to in 6.29, 6.42 and 6.60). If not, I strongly recommend that this search is carried out: it will provide the most up to date biodiversity information held, both in terms of location and local frequency.</p>	<p>BRERC records have been used in the preparation of the report referenced in paragraphs 1.4.11, 1.4.25, Table 1.7, 1.64 and 1.96. The Scoping Report assessment was prepared as update to the Initial Scoping Study on the assumption that data was accurate. The next stage of assessment will include an update to the desk based work, including revisiting data sources. Inaccuracies will be identified and corrected as appropriate.</p>

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6.6 6.7	The assumption of the zones of influence for desk top study and field surveys in 6.6 and 6.7 of the report seems sound.	Noted.
6.30	The report refers to information contained in the Bristol BAP (6.30). I am aware that the Bristol BAP is a work in progress, subject to update, and is not yet in the public domain, although the consultants may have spoken to Helen Hall, who is writing the BAP.	The BAP was available on-line at the time of writing – this version was used for the Scoping Report. Should an updated version be available for the next stage of assessment, this will be used.
Biodiversity Impact Assessment	<p style="text-align: center;">Ashton Vale to Bristol City Centre</p> <p>Correctly identifies the need for an AA on the potential impact on the Avon Gorge Woodlands SAC: presumably with input from Natural England.</p> <p>Correctly identifies the need for a Biodiversity Impact Assessment for Green Belt and Wildlife Network: can I assume this refers to a greater network also covering the SNCIs? I am assuming this Biodiversity Impact Assessment will follow the methodology for habitat and species assessment outlined in the report, together with analysis of the potential impacts at both construction and operational stages.</p>	Yes – we can confirm the assessment will be done as stated in Scoping Report (following IEEM EclA methodology) to include designated areas and to cover impacts through construction and operation.

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Page ix	<p>Emerson's Green to Bristol City Centre</p> <p>The requirement for a Biodiversity Impact Assessment on the Easton-Staple Hill Disused Railway SNCI is correctly identified. Presumably this will also examine the effects on any adjacent land needed for widening, together with surveys of the structures which may be affected.</p>	Yes
	<p>I am pleased to note the recognition (on page ix) that the route alignments 'pass in close proximity to several sites designated for their nature conservation value', with the need to develop specific measures to, '... avoid adverse effects in the form of habitat or fragmentation, compromised site integrity and degradation of site structure and function. Where it is possible to avoid damaging features of value, alternative alignments should be supported.'</p> <p>This is to be applauded and supported, whether it refers specifically to Wildlife Network Sites, SNCIs or other areas of biodiversity value.</p>	Noted.
3. Proposed methodology for the next stage of the assessment work	I would require further identification of potential foraging corridors for bats. This would include potential impacts on the foraging behaviour of Greater and Lesser Horseshoe bats roosting in Clarkencombe Lodge, Ashton Court, as well as those listed in Table 6.6;	Details of this roost were not included in the information used for the update. Ecological team will incorporate appropriate information in the next stage of assessment.
	Habitats suitable to support reptiles: this is of particular relevance with regard to the large population of slow worms in Bristol);	Noted.
	Badgers: there is an additional main sett which may not have been identified in the section of the Easton-Staple Hill Disused Railway SNCI at Marshfield Road.	This will be included in the next stage of assessment.

Issue Considered	Comment	Response
	<p>The impact of the development will need to identify the impact on trees (in conjunction with any associated notable or protected species) through road widening and realignment works proposed along the City Centre section. Any new bridges considered would need to take into account protected species (including otters, which have been recorded on the Rivers Avon and Frome).</p>	<p>Landscape to review possible requirement for arboricultural survey, and amend reference if considered appropriate. Tree surveys for bats have been identified as a possible requirement.</p>
<p>Tables 6.9 – 6.11</p>	<p>Tables 6.9 to 6.11, outlining further survey requirements, refers to, 'Consultation with local authority Biodiversity Officer' in a number of places. The reasons for this needs clarification: if it is for survey information, this needs to be sought from BRERC. I do not anticipate being further involved until detailed biodiversity information and analysis of potential impacts at both construction and operational phases (complete with any possible mitigation and/or compensation) is presented.</p> <p>The presence of Hawkfield Meadows SNCI in the table needs to be addressed, as does the absence of Colliters Brook SNCI (from where otters have been recorded recently) and any information on the city centre route.</p>	<p>Clarification to be included in the text: it is our intention to discuss the potential implications of works on designated sites with the biodiversity officer prior to the completion of the assessment.</p> <p>References to be amended as appropriate.</p>
	<p>Wildlife Network Sites (WNS): I am not sure they have been identified for assessment of possible impacts (apart from Butterfly Junction). WNS are protected under Policy NE6 of the current Local Plan</p>	<p>The Scoping Report assessment was prepared as an update to the Initial Scoping Study on the assumption that data was accurate. The next stage of assessment will include an update to the desk based work, including revisiting data sources. Inaccuracies will be identified and corrected as appropriate..</p>

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	<p>Sites of Nature Conservation Interest (SNCIs) are protected under Policy NE5 of the current Local Plan. These include higher level sites (SSSIs, SACs, SPAs) as well as Local Sites and Regionally Important Geological and Geomorphological Sites (RIGS). Analysis of the possible effects on the SNCIs will need to reflect the SNCI designation criteria: this includes the value of some SNCIs as linear corridors.</p>	<p>Ecology specialists to take into consideration in the next stage of assessment.</p>
<p>Comments from Bristol City Council (Steve Hardiman) received 26th March 2008</p>		
<p>General</p>	<p>At this stage there is little emphasis upon Landscape impact, although however proposals are considered, this is bound to be significant, as much of the route passes along such a narrow landscape corridor, It is assumed that your landscape architects will use established methodology in line with the Guidelines for Landscape and Visual Impact Assessment Second Edition, as 'an essential reference for landscape baseline in all landscape impact assessment'.</p>	<p>Reference to be clarified.</p>
<p>Flood Risk</p>	<p>I am hoping that someone will be representing the authority in this respect. The current scoping report seems to be based largely on flood risk. The constraints maps only seem to identify flood risk factors. Even Appendix B – Ecological Supporting Information appears to be mostly concerned with ditches and streams, although my belief is that many more habitats will be affected that do not seem to have been assessed. Whilst I'd hardly argue against the importance of hydrological impacts, it is an extremely limited basis for assessing other environmental impacts</p>	<p>The assessment will cover all environmental topics required by the appropriate guidance. Further ecological survey work is being undertaken examining protected species.</p>
<p>Central Urban Areas</p>	<p>The central urban areas are likely to involve quite a few different impacts, the effects of which will be more apparent once further detail is available.</p>	<p>Improve map clarity if possible. Landscape specialists to review comment and amend text to</p>

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	<p>At the plan scale shown it is hard to discern what effects there will be upon existing trees, and that should surely be covered by this work. There would be particular concern at the risk of any loss of trees associated with recent Broadmead Extension scheme, as their presence has been so important in mitigating the effects of that development, and its associated highway works.</p>	<p>include reference as appropriate.</p>
	<p>Within the City Centre itself, the impact is immediately apparent even with little detail. Only one route has been shown, and that bisects the central space currently occupied by the cenotaph. The major concern here relates to what would be inevitable loss of the magnificent London Plane trees at this point, unless alternative alignments are explored.</p>	<p>Clarify the accuracy of this interpretation – route alignment believed to be on-line. Amend mapping as appropriate.</p>
	<p>Elsewhere, the route is located within the existing highway, and it seems both arbitrary and unnecessary if it is allowed to extend motorised surfacing into valuable pedestrian space, especially within an environment that is already heavily traffic dominated.</p>	<p>Clarify the accuracy of this interpretation – route alignment believed to be on-line. Amend mapping as appropriate.</p>
<p>Evaluation and Mitigation</p>	<p>Generally, the challenge with environmental scoping reports is to have a tool that provides an adequately robust basis for rigorous evaluation of impacts, and establishment of the degree to which it is possible to secure their mitigation; i.e. to what extent can mitigation prevent, minimise, reduce or reverse significant environmental impacts. My belief is that the rigour of this will be vital in any public consultation, and in any subsequent assessment of proposals. There is also a remaining concern, given the sensitive nature of much of the route indicated, that if this work is being done in isolation, it removes the ability to compare impact relative to that of alternative proposals whose consequences may be greater or lesser.</p>	<p>Comment noted. Client Team to consider merit of progressing evaluation of alternative options beyond “Do Nothing”.</p>

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Design	It is hoped that there will be more opportunity to comment on design proposals. Detail at this stage is limited and restricted to what may be typical applications. In reality, the setting for integrating bus platforms within either hard paved or soft contexts will vary considerably along the route. In most, if not all locations, the grass bank would not be an appropriate treatment.	Comment noted. This will be incorporated into the next stage of assessment.
	Whilst more of an engineering consideration, it is wondered if proposals take into account what I'd expect to be quite radical construction work associated with the much deteriorated Ashton Avenue Bridge.	Comment noted. This will be included in the assessment work.
	As work proceeds, it is felt that greater clarity will be needed in illustrating what the ultimate scheme will look like; the CD contained no visualisations. It is also unclear what effects there will be on existing users, notably walkers and cyclists. Whilst I am probably misunderstanding the key there was at least one section of 'cycle footway' sandwiched between sections of single busway. What happens to that latter when the former applies and vice versa?	Comment noted. Clarify the position with regard to dual use and amend as appropriate.
	In the format provided, the plans were not very legible even when zooming in to over 200% on the screen, as detail progressively pixelated. It would also have been useful to have had a location map, enabling immediate awareness of the route and extents.	Improve map clarity.
Comments from Avon Wildlife Trust received 26 th March 2008		
General	We are concerned that the cycle path section of the BRT proposal is described as a 'disused railway corridor' in the report. This seems to ignore the fact that the path is one of the most well used routes in the country by walkers and cyclists;	Amend references in text re: current use.
	Have the local RIGS group been consulted on the possible impacts	This will be addressed at the next stage of consultation associated

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	to geological sites on the proposed route ?;	with the assessment.
	As the report outlines, an appropriate assessment will have to be done due to the proximity of the proposed route to the Avon Gorge. Will this have to be done jointly by North Somerset and Bristol Councils ?;	The assessment process for AA includes a screening process. This is not being undertaken as part of this work. However, the screening report will identify the scope of any AA requirement and set out responsibilities for completion as appropriate.
	The proposed BRT route will run through the proposed major Ashton Park development SW of Bristol , and will have to dovetail with the proposals for that development and with North Somerset Council's LDF core strategy which was out for consultation in 2007;	Noted.
	We are concerned about the proposed impacts on SNCIs on or adjacent to the route, particularly as one of these Hawkfield Meadows, will be affected by the Hengrove Park development. It is clear from proposed plans that the BRT is planned to run through the site in future. Colliter's Brook is also a valuable site and is already within the Ashton Park development footprint.	Noted.
Comments from Bath NES (Geoff Webber) received via telephone on 1 st April 2008		
General	Our view is that this scheme does not require an environmental assessment as the environmental impacts are disparate.	EIA is a requirement for the funding sought for the proposal and will be progressed.
Comments from the Environment Agency received on 2 nd April 2008		
General Comments	Planning Policy Statement (PPS) 25 requires the Sequential Test to be demonstrated for planning application proposals other than those that meet the description in footnote 7 of the PPS and Change of Use.	Noted – the proposal is not currently being progressed to planning application – the EIA is to support the MSBC. The scope of the flood risk analysis to date has been tailored for this purpose. Noted – the proposal is not currently being progressed to planning

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	<p>Where the proposal is for a 'Major' development (such as this) the Environment Agency will object to such planning applications on the lack of evidence of the Sequential Test. The Sequential Test is a requirement of PPS25 and the Local Planning Authority (LPA) must be satisfied that it has been demonstrated and the Exception Test applied if appropriate too. In each case the LPA must have a demonstrable Sequential Test (and Exception Test where appropriate) as part of the planning application. If they do not and they are challenged then this could clearly be an issue for them and could possibly lead to judicial review.</p>	<p>application – the EIA is to support the MSBC. The scope of the flood risk analysis to date has been tailored for this purpose.</p> <p>Client team to consider merit of progressing evaluation of alternative options beyond 'Do Nothing'.</p>
	<p>Advice on the evidence required to show that the Sequential and Exception Test has been properly applied is set out in the Sequential Test table within the draft Practice Guide to PPS25 and the Environment Agency's Standing Advice on development and flood risk.</p> <p>Our planning standing advice matrix for Development and Flood Risk can be found at http://pipernetworking.com/floodrisk/matrix.html</p>	<p>Comment noted.</p> <p>This would be referred to and applied if this was an FRA. If, and when, a planning application is submitted, a separate FRA will have to be prepared. This is not a requirement yet. Text within the flood risk element of the Environmental Scoping Report could be revised to make early comment on the sequential test/exception test and whether it would be easy or hard to proceed – i.e. whether it is highly vulnerable in a Zone 3.</p>
Development Control	<p>From a flood risk aspect we agree in general with the information in the scoping report (Section 8 and Appendix C: Flood Risk Assessment), and the proposed scope and methodology of the next stage of assessment.</p>	<p>Comment noted.</p>
	<p>However where possible, the route should avoid Flood Zone 3 rather than just assuming that flood risk can be dealt with through mitigation works. Please provide reasons why the route needs to pass through Flood Zone 3 and cannot be sited where there is less risk of flooding and associated disruption (i.e. a sequential</p>	<p>Comment noted. Text to be clarified as appropriate.</p>

Issue Considered	Comment	Response
	<p>approach/test in accordance with PPS25).</p> <p>We agree with your proposed actions and wish to re-iterate that modelling of watercourses must be undertaken as part of the flood risk assessment associated with the planning application. It will not be acceptable to address it later at the consent applications stage. (We cannot comment on your “stage 2 assumptions” at this stage.) There must be no increased risk of flooding elsewhere as a result of the proposed works.</p>	<p>Comment noted.</p> <p>It would be hoped that any modelling undertaken in the next stage could be used in the formal FRA produced as part of the planning application. However, it should be noted that further modelling may be required, or at least updated with detailed design information. However, this is a long way off at this stage.</p>
	<p>Whilst we advocate sustainable drainage systems and no increase in surface water runoff (volumes/rates) as a general rule (Annex F and particularly para. F6, PPS25), there may be a few situations where there are better flood risk/environmental options. For example, if and where the route passes adjacent to the tidal River Avon then a direct, full discharge may be the best option (provided tide-locking of the outfall is accommodated). At locations away from the River Avon, attenuation should be undertaken close by to the proposed development within the local catchment, unless demonstrated that there would not be an adverse effect if it was sited further afield. Where there is a deviation from the general rule then please provide the reasons behind your surface water management proposals.</p> <p>Finally, due to the size and complexity of the project, please could you submit a chart of your proposed timescales to us, in particular approximate dates of consultation and data requests, so that we can try to plan and allocate resources to providing for and reviewing the project. In addition, when the route has been finalised and confirmed we would be interested in visiting the existing sites.</p>	<p>Comment noted. Suggestions to be reviewed and reflected in the next stage of assessment as appropriate.</p> <p>Further meetings/discussions will be held with the Environment Agency during the detailed design stage. For such extensive works, the EA will be consulted with on a regular basis.</p> <p>Client team to advise on publication of proposed timescale.</p>
Biodiversity	<p>It is important that where watercourses are crossed provision should be made for mammals in the form of either ledges or pipes. These should be 300mm diameter.</p>	<p>Comment noted. This will entirely depend on whether mammals are present and whether they require a crossing</p>

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	<p>We note Japanese knotweed has been identified in the preliminary surveys. A strategy for Japanese knotweed should be prepared in advance of works as it is an offence to cause knotweed to spread in the wild.</p>	<p>point. This will be covered in the assessment</p> <p>Comment noted.</p>
Socio – economic.	<p>Current use of the Bristol-Bath railway path by walkers and cyclists should be assessed. This proposal will impact on the existing use and provision should be made for the other users to continue to use a sustainable transport route.</p>	<p>Amend reference in text re: current use. It should be noted that the socio-economic aspects of the scheme are being addressed through a separate assessment process.</p>
Water Quality	<p>Section 8 of the scoping report identifies watercourses potentially affected and the methods used to assess risk to the water environment during construction and operation of the BRT scheme. This should enable appropriate mitigation methods to be used to prevent Water Pollution.</p>	<p>Comment noted.</p>
	<p>The following Environment Agency guidance notes, available on our website, are also likely to be relevant to the development:</p> <p>PPG01 -General guide to the prevention of pollution PPG05 -Works and Maintenance on or near water PPG06 -Working at construction and demolition sites PPG22 -Dealing with spillages on highways.</p>	<p>Comment noted.</p>
Groundwater and Contaminated Land	<p>Based on the information provided, we do not have any objections, in principal, from a Groundwater Protection perspective.</p> <p>We note the requirement of further works related to the assessment of potential risks to Controlled Waters and agree that such work must be undertaken. We would welcome the opportunity to be consulted in due course.</p>	<p>Comment noted.</p>

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Comments from South Gloucestershire Council received on 2 nd April 2008		
	SG Council Environmental Protection Team has no additional items to add to the scoping exercise, and concurs with the approach and methodology in the report.	Comment noted.
Comments from North Somerset Council received on 19 th March 2008		
	I have had a look at this wrt possible AQ impacts. In terms of the current AQ objectives this sort of development in isolation is very unlikely to have deleterious effects on local A in NS, however I suspect this is part of the bigger development that might occur in the coming years in this area thus and there may well be new traffic impacts then as the park and ride and the combined rapid transport link become a destination point.	

Table B.2 – Scoping Report September 2008: Summary of Consultation Responses

Issue Considered	Comment	Response
Jan Walters (BCC Nature Conservation Officer) received 14 th October 2008		
6. Method	The methodology with regard to biodiversity seems most thorough.	Noted as supportive representation.
6.11	Paragraph refers to the Bristol and Avon Biodiversity Action Plan. The Bristol Biodiversity Action Plan is being finalised, and will be available from November 12th in CD form from the Bristol Biodiversity Partnership.	Comment noted. At the time of issue the Bristol and Avon BAP used was the most current document. The revised version will be sourced and used for future reporting.
6.33	Paragraph refers to Butterfly Junction. It should be noted that this site, although not having any statutory designation, has a high profile locally	Further information has been received in respect of Butterfly Junction since the publication of the Scoping Report. This will be incorporated into future reporting.

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General	Any proposed mitigation needs to be considered in terms of the final document- Retention of green infrastructure needs to be considered between the boundary of Bristol and North Somerset.	The retention of green infrastructure between Bristol and North Somerset should be reflected in recommendations for mitigation.
Environment Agency received 24 th October 2008		
6.31	The Avon BAP also has habitat action plans for 'Standing open water' and 'Watercourses and floodplain'.	Noted. Consider inclusion of additional references in 'Notable Habitats' pg 6-8.
Table 6.4	Otter - the Longmoor brook has had signs of otter activity in the past.	Noted. Surveys for Otters are scheduled along the Longmoor Brook, to be undertaken in 2009 as part of surveys required for the ES.
Table 6.5	Survey should be included for water voles and otter on the Longmoor brook and field drains.	Noted. Surveys for Otters and water voles are scheduled along the Longmoor Brook and associated field drains, to be undertaken in 2009 as part of surveys required for the ES.
6.52 / 12.28	Where watercourses are to be crossed provision must be made for mammals in the form of ledges or underpasses and wherever possible compensatory habitat should be created to replace that lost.	Consider inclusion within recommendations/mitigation of ES.
Ashton Vale Heritage Group received 15 th December 2008		
Ashton Vale fields transit route	- do not agree with the suggested transit route through Ashton Vale Fields which is the community's natural Open Space and greenbelt.	Value of fields for local community to be reflected in planning section. Comment on routeing to be directed to the transport specialists within the team.
	- Ashton Vale Fields are also part SNCI (site of nature conservation interest) due to its wetland habitat and high water table, we wish to retain this area for our future generations.	Scheme development supported by ecological assessment. Where avoidance is not possible, ensure appropriate mitigation incorporated in scheme through recommendations.
	- these fields are also part wildlife corridor and part wildlife network	Scheme development supported by ecological assessment.

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	and retain a high level of biodiversity	Where avoidance is not possible, ensure appropriate mitigation incorporated in scheme through recommendations.
	- the fields are a natural active flood plain and alleviation area for the river and waterways when there are high water levels due to heavy rainfall etc.	Scheme development supported by flood and drainage assessment. Recommendations to include appropriate measures to attenuate any increased runoff.
	- Ashton Vale Fields are at the bottom of the valley and receives the run off of water from the hills.	Scheme development supported by flood and drainage assessment. Recommendations to include appropriate measures to attenuate any increased runoff.
	- Should the urban extension go ahead more run off water will be created adding to the already high water tables.	Scheme development supported by flood and drainage assessment. Recommendations to include appropriate measures to attenuate any increased runoff.
	<p>- there is a very good bus service which runs from a central point. Silbury Road is on the outskirts of the area so we do not feel this would serve our community well.</p> <p>- they do not wish to have a stop at the end of the currently very quiet Silbury Road and would be quite happy catching the bus from the Park & Ride stop.</p>	Point noted. Consideration to be given to merits of stop location as part of design finalisation. Comments to be passed to transport specialists within the team.
	<p>- should the rapid transit proposal go ahead they would prefer to see the route run alongside Longmoor Brook which is more industrial near the Park & Ride and David Lloyd buildings, away from the housing estate to reduce intrusion from noise/pollution/light etc to the local community.</p> <p>- by ensuring the route/stop was kept away from the residential area, this would also ensure that should the stadium go ahead that we would not have fans hanging around the area waiting for transport or being dropped off.</p>	<p>Alternative routeing has been considered as part of the scheme development; this includes Bristol City Centre to Ashton Vale Option 2, which runs through the existing industrial park to the south of the A370, and connects to Option 1 at the existing level railway crossing at Ashton Vale Road. This option also avoids the undeveloped Ashton Vale fields, considering an earlier comment by Ashton Vale Heritage Group.</p> <p>Preference for Option 2 alignment is therefore assumed and</p>

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		will be passed to the transport specialists within the team.
	- we believe that even now much of the Ashton Vale Community are still unaware of this proposal and how this and the other proposed developments will affect Ashton Vale.	Noted. Scheme development is to continue to be supported by consultation.
Bristol Living Project (joint BCC and Lottery Funding) on behalf of Ashton Vale Heritage Group received 8 th January 2009		
COLLITER'S BROOK		
8. Effects on Water Environment	The proposed system may interfere with the natural process of land drainage and biodiversity so we would like you to ensure that you start with the premise that Colliter's Brook is sacrosanct and that any interference is minimised and no culverting takes place.	Point noted. Scheme development supported by ecological, flood and drainage assessment. Recommendations for scheme design to be made based on avoidance first; and mitigation where avoidance is not possible.
	<p>The RT should not be sited in close proximity to the river corridor as it may have the following impacts,</p> <p>If the brook floods it may impact on the operation of the RT and either close it or require speed restrictions.</p> <p>There is potential for pollution in runoff from the RT system to directly enter the brook.</p>	Scheme development supported by flood and drainage assessment. Recommendations to include appropriate measures to attenuate any increased run off.
	<p style="text-align: center;">Aspirations:</p> <p>Enhance the quality of the Colliter's Brook itself and its corridor for biodiversity and aesthetics</p> <p>Increase the opportunity for the public to access the waterways when walking, cycling to and from the new bus-stops / new cycleway-pathway</p> <p>Increase the visual access, enjoyment and appreciation of the Colliter's Brook if seen from the RT</p> <p>Maximise the space made for water to reduce impact of flooding in the Ashton area from the three proposed developments of RT,</p>	<p>Noted. Consider inclusion in planning section and incorporate recommendations highlighting the potential for added value of the scheme for non-motorised users.</p> <p>Scheme development supported by environmental assessment work and appropriate mitigation to be recommended where necessary, for incorporation in the final design.</p> <p>Comments to be passed to transport specialists within the team.</p> <p>Environmental assessment work is ongoing and further surveys will be reported in an Environmental Statement. Full EIA will be necessary at such time as a planning application is made and is</p>

Issue Considered	Comment	Response
	<p>Ashton Park and Football Stadium Undertake an environmental impact assessment</p>	<p>therefore not yet required.</p>
	<p>Recommendations: Consider routing the RT along the Longmoor Brook rather than the Colliter's Brook as this preserves the quality of the Colliter's Brook in its natural state.</p>	<p>Value of Colliter's Brook to be reflected in planning section. Scheme development supported by ecological assessment. Appropriate mitigation to be recommended for incorporation within the final scheme. Comments to be passed to transport specialists within the team</p>
	<p>COLLITER'S BROOK BETWEEN SILBURY ROAD, WINTERSTOKE ROAD</p>	
	<p>Route the complementary walking and cycling path planned for the RT alongside this section to encourage walking and cycling along a safe, quiet blue – green wildlife corridor.</p>	<p>Noted. Comment to be passed to transport specialists within the team.</p>
	<p>Notwithstanding the above, Maximise the land take from the current open space for the Colliter's Brook corridor to keep it as naturalised as possible so that it does not become restrained in a channel. This will help to contribute to the flood management of this area particularly to offset the hard surfacing at the Park and Ride car-park and the car park at the car auction site that is immediately adjacent and the proposed new football stadium development. A full sustainable drainage scheme should be built into the scope of the project.</p>	<p>Scheme development supported by flood and drainage assessment. Recommendations to include appropriate measures to attenuate any increased runoff.</p>
	<p>By design actively enhance the river and its corridor aesthetically for wildlife and the public. This area could be made an outstanding focal point/point of interest through the creative use of seating, art and interpretation for the local community and commuters. Investment in enhancing the quality of the water environment so that it looks well kept will hopefully detract from prospective anti-social behaviour such as fly-tipping into open watercourses.</p>	<p>Comment to be passed to transport specialists in the team. Consider inclusion in planning section and incorporate recommendations highlighting the potential for added value of the scheme for the wider community.</p>

Issue Considered	Comment	Response
	<p style="text-align: center;">Water Framework Directive</p> <p>It may be useful to summarise the relevant aims of the forthcoming Severn River Basin Plan (Water Framework Directive) that we are expected to contribute to as a key stakeholder,</p> <p style="text-align: center;">Prevent deterioration of aquatic ecosystems, protect them and improve the ecological health of waters</p> <p style="text-align: center;">Aim to achieve at least good quality status for all waters</p> <p style="text-align: center;">Restore rivers to their natural state, minimise physical modification by infrastructure and development</p>	<p style="text-align: center;">Ensure inclusion of Severn River Basin Plan aims in Water chapter at the next stage of reporting.</p>
	RIVER AVON-NEW CUT	
	<p>The video interpretation of the route that was used in the public consultation exercise has raised concern that there will be not be enough physical space for all the elements of the scheme along the section along Cumberland Road, adjacent to the River Avon- New Cut. If extra space was required might it be useful and feasible to build a suspended promenade/walkway for walkers out over the New Cut parallel to the existing Chocolate Path?</p>	<p style="text-align: center;">Noted. Comment to be passed to transport specialists within the team.</p>
	<p>Ashton Swing Bridge, as you are probably aware, was originally a 2 deck bridge with railway line and road bridge above. Although now in disrepair it is a historical feature that has heritage value amongst the community.</p>	<p style="text-align: center;">Scheme development supported by a heritage assessment. Recommendations to include appropriate measures to protect the value of important heritage resources.</p>
Comments from Natural England Received 11 th March 2009		
Landscape Assessment	<p>- The methodology we generally advocate for use in Environmental Assessment is that which is set out in the Landscape Institute and Institute of Environmental Management and Assessment (IEMA)</p>	<p style="text-align: center;">The landscape assessment has been undertaken in accordance with relevant parts of the IEMA guidance.</p> <p>Full LVIA is not required until such time as a planning application is</p>

Issue Considered	Comment	Response
	<p><i>Guidelines for Landscape and Visual Impact Assessment (2002).</i></p> <p>- We therefore recommend ensuring that all stages of the landscape assessment component of this Environmental Assessment are consistent with the IEMA guidelines.</p>	<p>submitted. Findings will be incorporated into the ES that accompanies any planning application – DfT guidance does not specify this level of detail to support Major Scheme Bid applications.</p>
Species Impacts	<p>- The list of notable species to be assessed is reasonably comprehensive but it does not appear to extend to all species of principal importance for the conservation of biodiversity (see Section 41 of the Natural Environment and Rural Communities Act, 2006) that are likely to be found in the area.</p> <p>- It may not in every case be necessary to conduct specific surveys but we would recommend that the Environmental Assessment considers the potential impacts upon all species of principal importance for the conservation of biodiversity that could be affected by the proposals.</p>	<p>All relevant species of principal importance as listed in Section 41 of the NERC Act and their likelihood to be found in the area have been considered and the evaluations made will be detailed in the ES.</p>
Habitat Impacts	<p>- We welcome the fact that consideration of impacts upon habitats will extend to Local Sites in addition to statutory sites. The importance of Local Sites to biodiversity conservation is increasingly recognised within government guidance.</p> <p>- Bristol City Council have also identified non statutory Wildlife Network Sites that are important to the maintaining the integrity of local biodiversity. We would also recommend consideration of the likely impacts upon Wildlife Network Sites within the Environmental Assessment.</p>	<p>Consideration of likely impacts upon Wildlife Network Sites will be included within the ES.</p>
Opportunities for Environmental	<p>- In our view it is good practice for Environmental Assessment to</p>	<p>Noted. More detail of potential gains and enhancements to biodiversity over and above that which is required for mitigation will</p>

Issue Considered	Comment	Response
Enhancement	<p>consider opportunities for environmental benefits and enhancements over and above that which is required for mitigation or offsetting.</p> <p>- We therefore welcome the reference to the potential gains for biodiversity and recommend the development of more detailed and specific environmental enhancement proposals as part of the further work.</p> <p>- The intention to incorporate sustainable drainage measures, possibly including balancing ponds, within the design of the proposals may offer particular opportunities.</p>	be included in the ES.
Public Access	<p>- The proposals will clearly result in welcome improvements in pedestrian and cycle access.</p> <p>- However, the proposals may also have the potential to adversely affect existing rights of way and the ability of local people to access the natural environment. If this is not already planned we recommend you consider the inclusion of an assessment of any negative impacts the proposals may have on public access.</p>	<p>Noted. This element of the scheme impacts is addressed in other supporting information concerned specifically with transport and access, as well as referenced within the appraisal of scheme integration with policies and plans.</p> <p>Journey Ambience will be considered at such time as the ES is prepared to support a planning application – DfT does not specify this detail to support Major Scheme Bid applications.</p>
Test of likely significant impact upon international sites	<p>- We welcome the recognition that the proposal will need to be subject to the Habitat Regulations Assessment process in accordance with the Habitats Directive and Regulations.</p> <p>- As you are doubtless aware, this is a separate process undertaken by the Competent Authority, who are required to take guidance from Natural England. With this in mind, it would be helpful were the Environmental Statement to clearly set out any likely significant effects on internationally designated sites under a specific subject heading.</p>	Noted. The ES will clearly set out the likely effects on internationally designated sites and will be included under separate sub heading where possible.

