



Bristol Local Plan Review Consultation February 2018 Summary of Responses

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1. Introduction to this summary

Public Consultation on the Local Plan Review took place between 19th February 2018 - 13th April 2018. As part of the requirements within Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the consultation sought comments on the content of the Local Plan and what it ought to contain. Representations have been taken into account by Bristol City Council and will be used to inform the next draft of the Local Plan on which consultation is planned to start in October 2018.

A total of 436 responses were received on the content of the Local Plan Review. Responses received have been broadly summarised in this report.

Appendix A lists all respondents in alphabetical order and each respondent is given a reference number. The tables below summarise comments by proposal and by the themes raised by respondents. The respondents who commented on a particular proposal/theme are identified by a reference number in the right hand column ('References' or 'Theme References').

The comments of statutory bodies¹ and partnerships which include statutory bodies are summarised separately for each proposal.

¹ Bodies referred to in the Local Planning regulations.

2. Comments on Vision

Overview: In total, 66 respondents made comments regarding the Vision set out in page 6 of the document. Of these, 28 respondents were in general support of the vision, 5 were in general objection to the vision and 11 were comments neither in support nor objection. A total of 22 respondents suggested amendments to the vision.

Key themes that emerged from the responses:

Table 1 Comments from statutory bodies and partnerships

Key Themes	Theme References
<p>Support: Of those in support of the Plan Vision, respondents cited their support for the vision's reference to health and wellbeing; efficient use of land; different (non-market) housing tenures; sustainable communities; mass transport systems; development in South Bristol.</p> <p>Objection: Of those objecting to the plan Vision, respondents stated that it was too vague, focuses too much on the city centre and will not improve quality of life in the city.</p> <p>Bristol Port Company considered the plan has very little consideration of the Avonmouth Port and does not pay sufficient regard to the National Policy Statement (NPS) for Ports or acknowledge its implication.</p> <p>Amendments: Of those who suggested that amendments should be made to the plan Vision, respondents would like to see more emphasis on: climate change and sustainability; affordable housing; the environment; protecting tree cover; mixed and balanced communities; children and a child friendly city; wildlife and habitat protection; resources and waste; build to rent housing.</p> <p>Respondents also stated that the vision needs a stronger commitment to delivering housing and should express housing figures as a minimum. A more innovative and bolder vision was also encouraged.</p> <p>While no proposed amendment, some comments also noted that the vision does not fully align with Joint Spatial Plan (JSP), which seeks to close the gap between disadvantaged and other communities by 2036, while the plan Vision aims only to have 'substantially addressed' inequality/deprivation by 2036.</p>	<p>Ref 123, 168, 179, 217, 218, 225, 248, 249, 251, 253, 255, 269, 285, 286, 292, 298, 303, 306, 316, 317, 319, 322, 326, 337, 340, 343, 351, 353, 360, 361, 362, 363, 364, 365, 366, 369, 371, 372, 374, 375, 377, 380, 381, 382, 384, 385, 386, 387, 388, 392, 393, 396, 397, 400, 408, 409, 413, 415, 418, 424</p>

Comments from statutory bodies and partnerships:

Table 2 Comments from statutory bodies and partnerships

Consultee	Reference
Bristol Avon Catchment Partnership have suggested in-text changes to the vision to enable a more proactive strategy which makes explicit reference to adaptation to climate change within the vision statement.	Ref 2
Historic England wish to encourage a greater recognition of the economic, social and environmental values of heritage as set out within the Government's Heritage Statement (2017). The Local Plan will have a significant influence on the future of the historic environment – how might the vision in the Local Plan express a commitment to it and a positive role for it in shaping the planning for the City's future?	Ref 246
Highways England provided general support, particularly the aspiration for developing mass transit systems. Important that delivery of transport schemes	Ref 336

Consultee	Reference
is co-ordinated with other development and infrastructure is there when required. Consider timeline at 2.2 should consider potential impact of M4 and M5 junction schemes set out in the Joint Transport Study (JTS).	
Wessex Water state vision should make greater reference to climate change and wider catchment based approach to water management. This would meet aspirations of Policy 5 and Policy Principle 5 in JSP. Climate change is biggest challenge presented to Bristol to deliver future vision. Section 2.2. Suggested amendments to wording to reference climate change and resilience (see response).	Ref 345
Environment Agency suggest that the specific reference to the plan's natural environment and climate change resilience objectives is set out.	Ref 405

3. Comments on Strategy - Meeting housing needs through urban living

Overview: In total, 50 respondents made comments regarding the section "Strategy - meeting housing needs through urban living" set out in page 7 of the document.

Key themes that emerged from the responses:

Table 3 Summary of consultation responses to elements of the Proposal

Key Themes:	Theme References
<p>Housing need and targets: There were some expressions of general support for the housing target set out in the strategy and also for the aspiration to exceed the housing target. Several respondents suggested that the wording should be amended to state the targets explicitly as a minimum.</p> <p>Respondents raised concern that the target would not be deliverable given the current rates of housing completion in the city, while others requested more detail on the distribution and deliverability of housing in sites across Bristol. It was suggested that land should be re-assessed in order to meet the aim to exceed the housing target.</p> <p>There were several objections to the housing targets, on the basis that the figure passed down from the JSP is incorrect, with a substantial under-estimation of housing need. Objectors referenced the Government methodology that should be applied to re-calculate need.</p> <p>Other matters raised: The following concerns were also raised by respondents:</p> <ul style="list-style-type: none"> <i>Housing type:</i> while some respondents support the reference to different types of tenure, others felt a greater emphasis on affordable or temporary housing is needed. Comments were also received on the need for child friendly and high quality housing. <i>Infrastructure:</i> the need to reference infrastructure required to support housing delivery was raised. <i>Employment land:</i> one concern was the lack of employment land identified to match housing delivery. 	Ref 2, 13, 39, 111, 112, 151, 248, 249, 273, 286, 298, 303, 316, 317, 324, 343, 350, 359, 360, 361, 362, 363, 364, 365, 366, 369, 371, 372, 374, 375, 377, 379, 380, 381, 382, 384, 385, 386, 387, 388, 406, 407, 409, 413, 415, 417, 418, 424, 431

Comments from statutory bodies and partnerships:

Table 4 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Historic England recognise the opportunity provided by making the best use of land within the urban area and endorse the principle of Urban Living Concept in a form of development that will “reflect Bristol’s Urban Character”. The inherent sustainability of the approach is welcomed <u>on the basis that the risks associated with unrealistic capacity assumptions are addressed</u> due to potential harm to the significance of the city’s historic townscape and setting of heritage assets.</p>	Ref 246
<p>Bristol Avon Catchment Partnership is supportive of the development around the river should endeavour to revitalise the rivers for people and wildlife.</p>	Ref 2
<p>Natural England: In general support for development strategy, however a much greater level of ambition for the natural environment is needed to ensure scale of development proposed is truly sustainable. As noted in the Sustainability Appraisal Scoping Report, the Urban Living SPD will increase pressure on existing green spaces, especially where there are existing deficiencies in provision. Recreation and other issues related to new development are also likely to impact on designated sites within the plan area, and potentially beyond.</p> <p>The importance of the natural environment as part of sustainable development and the development of the West of England Green Infrastructure Plan should be given greater prominence in the Plan, supported by a commitment to seeking enhancements to the Green Infrastructure network commensurate with the scale of new development and to achieving a net gain in biodiversity. This would accord with the Defra 25-year Plan for the Environment and the Joint Spatial Plan.</p> <p>JSP Habitats Regulations Assessment identified a number of likely significant effects on European sites and mitigating policies were introduced to avoid adverse effects.</p> <p>Natural England would welcome further discussion with BCC regarding green infrastructure and in relation to the HRA and SA/SEA for the Local Plan Review.</p>	Ref 349

4. Comments on Transport and Development Strategy

Overview: In total, 20 respondents made comments regarding the Transport Strategy set out on page 8, and 34 respondents made comments regarding the Development Strategy set out on page 9.

Key themes that emerged from the responses:

Table 5 Summary of consultation responses to elements of the Proposal

Key Themes:	Theme References
<p>Transport Strategy:</p> <p><i>Strategic transport:</i> Respondents considered that there is not a sufficient strategic transport plan for the city to support the planned growth, and that the failure to deliver major transport projects in alignment with development will exacerbate existing issues. It was highlighted that there is not enough consideration or mention of transport in relation to the intensification and urban living approach. Increased expenditure on strategic transport was suggested.</p> <p><i>Active travel:</i> the lack of emphasis on active travel including walking and cycling was raised as a concern, which some respondents feel should be a priority for the city. Stronger proposals on providing pedestrian and cycle access and strategic networks was requested. Related comments referred to the need for child friendly streets and promotion of electric vehicles.</p> <p><i>Specific projects:</i> support for a rail link between Bristol and Portishead was expressed by one respondent who also noted that the local rail network needs improving generally. A rapid transport link to Whitchurch and Hengrove was put forward by one respondent.</p> <p>References to other relevant plans in this section was requested, including the Bristol Transport Plan, City Centre Framework, Local Cycling and Walking Infrastructure Plan, and Transport Development Management guide.</p>	<p>Ref 12, 25, 55, 114, 209, 243b, 245, 253, 266, 271, 286, 293, 319, 324, 369, 378, 397, 415, 431</p>
<p>Development Strategy:</p> <p>Comments received were generally supportive of the Development Strategy, however several respondents highlighted the need for this to be supported by appropriate infrastructure and to protect the environment, as should any attempts to exceed the housing target. The potential use of masterplans was raised by respondents.</p> <p>Tall buildings were mentioned by some respondents. While some expressed objection to this aspect of strategy, others expressed a need for the council to take a proactive and positive approach to them to deliver the aims of the strategy.</p> <p>Another concern raised was that of balance; the need to deliver appropriate types of housing alongside economic growth, which a number of respondents felt was lacking in the strategy.</p>	<p>Ref 39, 96, 249, 255, 298, 303, 306, 313, 316, 337, 349, 351, 353, 359, 360, 361, 362, 363, 364, 369, 371, 372, 374, 375, 377, 378, 384, 409, 411, 415, 418, 424, 436</p>

Comments from statutory bodies and partnerships:

Table 6 Comments from statutory bodies and partnerships

Consultee:	Reference
<p>Network Rail state that any development of land which would result in a material increase or significant change in the type of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can be demonstrated that safety will not be comprised, or where serious mitigation measures would be necessary.</p>	Ref 208
<p>Highways England provide support, particularly aspiration for developing mass transit systems. Important that delivery of transport schemes is co-ordinated with other development and infrastructure is there when required. Timeline at 2.2 should consider potential impact of M4 and M5 junction schemes set out in JTS.</p>	Ref 336

5. CDS1: Bristol City Centre

Overview: In total, 49 respondents made comments regarding Proposal CDS1: Bristol City Centre. Of these, 28 comments were in general support of the proposal, 6 were in general objection to the proposal and 15 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 7 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>General Principle of Development: Of the comments supporting the principle of development, many referred to the suitability of the city centre for urban living but emphasised the need for flexible policies to enable resilience, diversity and balance in uses during the plan period. The need for supporting transport infrastructure was also raised.</p> <p>Concerns were raised over the extent of the proposal area. It was also queried whether the proposal would deliver a diverse housing stock including family, semi-sheltered and affordable housing to balance the existing proliferation of flats and student housing.</p>	Ref 130, 273, 309, 313, 345, 350, 363, 365, 366, 372, 374, 385, 386, 387, 393, 396, 401, 412, 425
<p>Housing Need Distribution: More detail on specific housing allocations and targets in the city centre was requested, including the need for new allocated sites. A need for delivery of a more mixed housing stock was stated, including family and affordable homes.</p>	Ref 290, 303, 313, 336, 350, 365, 372, 374, 387, 396
<p>Tall Buildings and Urban Living: Of those in support of tall buildings and urban living, the city centre is considered a suitable location for such an approach, provided tall buildings are limited to the right setting, which should be defined with some flexibility.</p> <p>Concerns were raised about the impact of this approach on heritage assets (including the Old City) and the type of housing the approach is likely to deliver which was considered to be mainly flats and student housing rather than needed family homes. An alternative mid-rise approach was considered more appropriate which would have less potential harmful impacts.</p> <p>One respondent was pleased to note that St. Pauls is not identified for densification.</p>	Ref 39, 114, 246, 250, 267, 288, 309, 313, 316, 354, 355, 363, 366, 372, 374, 412
<p>Agent of Change: There was overall support for the proposal, with respondents emphasising that it should be a robust, clearly defined local proposal that is not solely reliant on national policy backing.</p> <p>There was a query on the clarity of ‘desirable uses’ in proposal wording and requests that theatres and church bells should also be included in proposal.</p>	Ref 274, 295, 317, 322, 345, 397, 408, 416
<p>Retail: There was overall support for promoting retail uses in the city and regeneration of the Bristol Shopping Quarter. A comment noted that smaller retail spots such as Alma Vale Road should be designated centres.</p>	Ref 267, 291, 431
<p>Site Specific: The following sites were commented on, some of which are subject to existing BCAP policies:</p> <ul style="list-style-type: none"> • Support for Bristol Shopping Quarter (BCAP36). • Conflicting views on the suitability of tall buildings at Newfoundland Way (BCAP39). • Comments regarding the need to recognise Whiteladies Road as a prime business district for the local area and media industry and to be fully 	Ref 87, 291, 313, 322, 363, 366, 367, 385, 386, 393

Key Themes	Theme References
<p>included in BCAP map.</p> <ul style="list-style-type: none"> Request that Whiteladies Road is not considered a town centre. Concern that policies do not address area and visitor destinations between Temple Meads and the Western Harbour, including Redcliffe. Concern that South Redcliffe is not included in city centre framework. Requests that Old Market is included in CDS1 and reference made to its Neighbourhood Plan. Potential for Central Health Centre site to contribute to regeneration. 	
<p>Other Adopted Policies: There were a number of comments on specific existing policies:</p> <ul style="list-style-type: none"> Objection to removal of BCAP7 and potential impact on retention of employment sites in St Pauls. Support for retention of BCAP6. Strong objection to loss of BCS8. Support for retention of BCAP9 which should also be amended to clearly define cultural facilities in the city. Need for BCAP13-19 to include tourism policy and provide stronger protection for retail uses. Support for retention of BCS23 and DM33-35. While there was an expression of support for policies BCS21, DM26-30, BCAP1, BCAP30-34 due to their support for walking, other respondents felt they should be amended to set higher design standards, including support for signature buildings and structures. Comments on BCS22 and DM31 (heritage assets) stated a need to reference 'great weight' as per NPPF and to be amended to promote interventions around heritage buildings to secure their future and improve access. Proposed deletion of DM8 and BCAP16 to tackle vacancy levels, promote diverse centre and recognise contribution of non-retail uses in city centre. 	Ref 187, 253, 262, 267, 273, 288, 291, 293, 300, 313, 317, 322, 408, 442, 431
<p>Walking: Several respondents stated a desire to see more support for walking and pedestrian facilities in CDS1, including an account of progress since last Local Plan adoption. There was support for increased pedestrian provision and the expansion of primary and secondary pedestrian routes across the central development areas in Bristol.</p>	Ref 253, 293, 317

Comments from statutory bodies and partnerships:

[Table 8 Comments from statutory bodies and partnerships](#)

Consultee	Reference
<p>Wessex Water: response confirmed technical requirements for consultation in respect of sewers and the preferred approach to surface water drainage and sewerage. Support for agent of change proposal.</p>	Ref 345
<p>Highways England: the delivery of homes in centre will require JTS proposals for sustainable travel to/from city centre to be forthcoming. A transport assessment should consider the potential impact of development in the city centre, and how the proposed mitigation would address this impact.</p>	Ref 336
<p>Historic England recognise the opportunity provided by making the best use of land within the urban are and endorse the principle of Urban Living Concept in a form of development that will "reflect Bristol's Urban Character". The inherent sustainability of the approach is welcomed on the basis that the risks</p>	Ref 246

<p>associated with unrealistic capacity assumptions are addressed due to potential harm to the significant of the city’s historic townscape and setting of heritage assets.</p> <p>Historic England notes that Urban Living concepts focus on central Bristol, the core of the historic city. Due to its importance and sensitivity, notes the proposal commitment in 3.1.7. There is much that the Local Plan can do to safeguard and promote Bristol’s heritage –the commitment in 3.1.7 to protecting the Floating Harbour’s maritime is welcomed. The Plan’s evidence base and community involvement may identify other important matters to highlight.</p>	
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6. CDS2: Extended Bristol Temple Quarter Enterprise Zone

Overview: In total, 22 respondents made comments regarding Proposal CDS2: Extended Bristol Temple Quarter Enterprise Zone. Of these, 12 comments were in general support of the proposal, 2 were in general objection to the proposal and 8 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 9 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>General Principle of Development: Those in support considered that the extended Bristol Temple Quarter was a sustainable location for new and affordable homes. Delivering housing and high-quality office space presented an opportunity to address deficiencies in supply and performance of the Temple Quarter Enterprise Zone (TQEZ).</p> <p>Key messages stated:</p> <ul style="list-style-type: none"> • Need to align with the wording of the Urban Living SPD, which states that the area has the potential for urban living, tall buildings and higher densities. • Extension of the TQEZ should not dilute the priorities of more central sites included in the current Enterprise Zone. • There is a need to consider improving connectivity in and around the station and proposed university campus. • Traffic will need to be carefully managed, and mitigation measures identified to ensure the primary drivers for a fair and equitable City are achieved and maintained. • Need to consider the impact of viability associated with the other policies within the Plan, which may impact the delivery of the Temple Quarter Enterprise Zone. <p>Respondents who objected to proposals generally considered that:</p> <ul style="list-style-type: none"> • The principle of development should not be delivered through tall buildings, as these are inappropriate within the area. • Introduction of new land uses: concerns over the potential impact of new uses on existing noise-generating businesses to operate, particularly in relation to proposed residential uses. • Flexible uses: land use should be flexible in regeneration locations to allow changes in use where needed to respond to market circumstances. 	<p>Ref 69, 252, 264, 273, 316, 347, 350, 354, 355, 364, 365, 401, 403, 419,</p>
<p>Range of Uses and Intensity of Employment Uses: Generally respondents supported the range of uses and intensity of employment. Considered that there are already many office buildings, converted to flats and consequently, a shortage of office space. Retail must be retained on the ground floor, otherwise the City Centre will be eroded.</p>	<p>Ref 252, 267, 316, 354, 365</p>
<p>Spatial Framework: Support for the delivery of a Spatial Framework on the site.</p>	<p>Ref 246, 316</p>
<p>Extension to the Temple Quarter Enterprise Zone (update to Policy BCAP35): Whilst the approach to extension of the Temple Quarter Enterprise Zone was generally supported, respondents considered that sites should be brought forward sequentially. One respondent considered that the proposed university development should have restrictions on student accommodation and adequate car-parking provision needs to be allowed</p>	<p>Ref 252, 273, 316, 317, 354, 364</p>

Key Themes	Theme References
for.	
<p>Temple Quarter Enterprise (TQE) Campus: Generally this proposal was supported, with the following commentary raised:</p> <ul style="list-style-type: none"> Reference should be made to the TQE Campus in proposal-wording to provide clarity on the expected nature of development. Students at the new Campus should be accommodated in Purpose Built Student Accommodation (not HMOs), and a mix of uses within the Enterprise Campus should be supported. Support the aspiration for a 'pedestrian street' through Temple Meads to connect with the Temple Quarter site. 	Ref 264, 289, 316, 319, 347, 355
<p>Other Sub-themes included:</p> <ul style="list-style-type: none"> Arena: There is no mention of the Arena within the Plan or Proposal CDS2; considered to represent a gap in the long-term planning of this area. 	Ref 102, 317, 345, 378

Comments from statutory bodies and partnerships:

[Table 10 Comments from statutory bodies and partnerships](#)

Consultee	Reference
<p>Historic England request that great care be taken with the language associated with Proposal CDS2 in that it currently states that "Temple Meads Station will be redeveloped", request that the policy is clear in that redevelopment of the station is <u>not the intention</u>. Expect the Local Plan to make special reference to the importance of this nationally significant railway complex and a commitment to its Grade 1 listed status.</p> <p>Historic England also question whether evidence will be gathered and a similar Spatial Framework prepared for the EZ extension, as is the case for the current EZ. The extension of the EZ provides a welcome opportunity to enhance a number of important historic sites including the immediate setting to the north of St Mary Redcliffe, which could be highlighted as components of the Plan's positive heritage strategy.</p>	Ref 246
<p>Wessex Water: response confirmed technical requirements for consultation in respect of sewers and the preferred approach to surface water drainage and sewerage.</p> <p><i>Flood Risk:</i> Wessex Water consider positive wording should be incorporated into the Local Plan so as to ensure that water management and flood risk solutions will be considered to assist in the delivery of development.</p>	Ref 345

7. CDS3: St Philips Marsh

Overview: In total, 27 respondents made comments regarding Proposal CDS3: St Philips Marsh. Of these, 12 comments were in general support of the proposal, 11 were in general objection to the proposal and 4 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 11 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>General Principle of Development: Of the comments supporting the principle of development, respondents noted that the redevelopment of St. Philips Marsh would complement Proposal CDS2 (Extended Bristol Temple Quarter) and the development of a University of Bristol campus. It was felt that this link could be made clearer in the proposal wording, and one respondent queried the arbitrary boundary between the two areas.</p> <p>Respondents felt that it was important that land use in the area remain flexible, diverse and balanced and should retain some of the existing economic uses. Some comments suggested that a guidance ‘framework’ document could help direct development in the area, while others stated development would need to be supported by substantial transport and accessibility improvements in order to be successful.</p> <p>Concern was raised about the impact of the proposal on existing businesses and employment use if residential uses were introduced, due to noise and pollution concerns. These uses are considered incompatible. Objections also highlighted the need to retain jobs in local areas in sustainable locations, and the importance of having a diverse employment base including light industrial.</p> <p>One respondent suggested the proposal area should include Avon Meads Retail Park which has potential for redevelopment.</p>	<p>Ref 21, 29, 78, 117, 180, 203, 226, 264, 347, 350, 364, 365, 378, 381, 397, 415</p>
<p>Proposals for Redevelopment and Change to Mix of Uses (Higher Intensity Employment Uses): Comments in support stated that the proposal should be explicit in identifying that employment land is not protected outside of those sites identified in Proposal EC2.</p> <p>Comments in objection primarily raised concern that the proposal would lead to eventual permanent loss of employment sites, even if not intended, due to the incompatibility of such uses with introducing residential elements. It was raised that the proposal may place additional burdens on existing businesses that could threaten their operations and only those not creating adverse impacts on residential uses would survive. Landlords would also only offer short term leases due to potential planning gain in long term, while smaller businesses would be priced out by gentrification. The need for sustainable, mixed employment sites was raised.</p>	<p>Ref 78, 117, 180, 203, 208, 226, 273, 347, 364, 365, 378, 381, 405, 430</p>
<p>Flood Defences: Respondents stated that more detail and stronger wording could be provided in the proposal around improvements to River Avon with regard to greenways, sustainable travel use and improved flood and water management.</p>	<p>Ref 345, 351, 397, 405</p>
<p>Wholesale and Fruit Market: Several respondents were concerned that the proposal did not mention or safeguard the St Philips Wholesale and Fruit</p>	<p>Ref 126, 297, 317, 353, 370</p>

Key Themes	Theme References
Market, considered to be a regionally important market with potential to develop into a regional hub for the sustainable food system. It is a significant part of city food infrastructure and should be safeguarded or designated as such, with the proposal supporting its development and growth.	

Comments from statutory bodies and partnerships:

Table 12 Comments from statutory bodies and partnerships

Consultee	Reference
<p>The Environment Agency <i>Conflict between existing and proposed uses:</i> states that the area identified includes a number of well-established water storage and processing activities which are regulated by the Environment Agency under the Environmental Permitting Regulations. These sites have the potential to cause noise, dust, odour and pollution which could impact on proposed uses: affordable homes, offices and flexible uses, education, leisure and retail. The Agency would seek reassurance that Local Plan Policies BCS23, DM33, and DM35 will continue to be used to safeguard the ongoing-viability of these industries, which may be vulnerable to noise sensitive developments. There needs to be additional detail on this matter to support the ongoing viability of these industries.</p> <p><i>Flood Defences:</i> recommend that any proposal review considers that:</p> <ul style="list-style-type: none"> • BCS16 should be revised to include specific reference to the requirement to ensure no adverse impact on third party interest resulting from new development or associated mitigation measures. • The outputs of the River Avon Tidal Flood Risk Management Strategy should inform Local Plan Proposals, detailing site level flood risk mitigation with the affected area. <p>The Strategic Flood Risk Assessment will require updating to reflect current modelling outputs and associated datasets.</p>	Ref 405
Wessex Water confirmed technical requirements for consultation in respect of sewers and the preferred approach to surface water drainage and sewerage.	Ref 345
Network Rail: consider that Proposal CDS3 must take into consideration that St Philip's Marsh March Train Maintenance Depot, which has a heavy industrial use and is operational 24hrs a day, 7 days a week. Future proposals should take into account the possible effects of noise and vibration and the generation of airborne dust resulting from the operation of the railway.	Ref 208

8. CDS4: Delivery of an enhanced gateway and new city quarter at the Western Harbour

Overview: In total, 62 respondents made comments regarding Proposal CDS3: St Philips Marsh. Of these, 8 comments were in general support of the proposal, 37 were in general objection to the proposal and 17 were comments neither in support nor objection, or required additional content or clarity.

Key themes that emerged from the responses:

Table 13 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>CDS 4 General Principle of Development in this area: General support for replacement of existing over-engineered road (and bridge) network and the principle of residential use as this creates an opportunity for an enhanced community. Affordable housing must be secured (with 40% identified as a minimum), with consideration needed for alternative models of housing delivery. Responses considered that this was an opportunity to restore the architecture and character of the Western Harbourside area.</p> <p>Key concerns included:</p> <ul style="list-style-type: none"> • Concerns over losing the character of the basin; any development should leave a generous margin to the River Avon and not impact views, enjoyment or setting of heritage features. • Need to consider requirements for new transport infrastructure and ways to retain both north-south, east-west and local connections. This needs to be backed up by detailed studies set within a wider Bristol Transport Plan and City Centre movement strategy. • Principles behind approach were considered to be too vague, with additional consultation needed on how the plans will be funded and who will benefit. • Proposed incompatible uses within the area. Not considered appropriate for industrial areas to be replaced by residential developments. The Local Plan should prioritise keeping industrial uses and extending PIWA designation. • Development should be restricted to existing under-developed space. • The New Cut should be removed from the proposed area, as it has a different character, heritage assets, important park land and varied employment land. • Respondents objected to the renaming of Spike Island, Hotwells and Cumberland Basin as “Western Harbour”. Proposed boundary for the focus for development is unclear. • Proposals need to connect and interact with the existing area. • Respondents queried why Policy BCAP41 had not been retained: Consider a replacement policy is needed focussing on tourism development in the Harbourside area. 	<p>Ref 20, 67, 76, 78, 95, 96, 111, 137, 147, 165, 181, 195, 206, 219, 246, 253, 267, 273, 274, 276, 304, 339, 350, 378, 384, 415, 430, 442</p>
<p>CDS4 Extending the Western Harbour and Cumberland Basin as a Residential Area: Respondents for new development in the area would need a high percentage of genuinely affordable homes, with a focus on delivering residential development for local people and workers. There should be a focus on brownfield development, which should be of a scale to sustain infrastructure and mixed uses.</p> <p>Respondents who objected to proposals generally considered that:</p>	<p>Ref 20, 57, 67, 85, 89, 90, 96, 111, 117, 144, 147, 159, 180, 195, 203, 213, 226, 263, 274, 290, 304, 384</p>

Key Themes	Theme References
<ul style="list-style-type: none"> • Initial proposals focus on roads and tall buildings, both which could be detrimental to the character of the area particularly given the number of historical buildings within the area and key view to the suspension bridge. • Residential development must not threaten maritime industries - agents of change principle should apply. • Retain Bond Warehouse and Repository Buildings sites for housing instead of building new developments. • Respondents set out that the area boundary should be reconsidered as it includes significant levels of current green space. Loss of this green space would be unacceptable. • Suggestion to explore creative small space housing such as shipping containers under existing carriageways. 	
<p>Reorganisation of Infrastructure, Roads and Bridges: General support for the replacement of the existing over-engineered highway network, and there is an opportunity to restore the area to the pre-1960's setting. However, there is a need to consider alternatives: tunnels should be considered to limit visual impact. Provision should be made for cycling and considerations must be given to air quality. Need to ensure that any proposals are considered in the context of the West of England Transport Plan and anticipate technological change to ensure forthcoming traffic proposals are not quickly redundant again.</p> <p>Key concerns included:</p> <ul style="list-style-type: none"> • <i>Vague Proposals:</i> Current proposals are too vague, with unexplained consequences north and south of the river on the setting and heritage assets. • <i>Restoration of Heritage:</i> A number of respondents considered there should be an ambition to restore the setting of Avon Crescent to something more appropriate. Whilst reconfiguration is necessary, Plimsoll Bridge and Cumberland Basin Swing Bridges are landmark features. Reference needs to be made to the Conservation Area appraisal. • <i>Interaction with Other schemes and Navigation:</i> Metrobus proposals, Chocolate Path, Flood work and Impact on Navigation (especially large vessels) into the Floating Harbour needs to be considered. Any lower bridge must enable shipping. • Proposals need to consider the <i>public and tourism use</i> of the area, and insist that development leaves green or shared spaces for people to enjoy this area. • <i>Case:</i> Strength of case for reorganisation needs to be made. Aesthetic reasons are insufficient, and the benefits of 'Do Nothing' should be considered. • <i>Implementation:</i> Reorganisation of this area will bring congestion to the rest of the City during construction, have an environmental impact, and bring disruption to neighbouring communities. Ground stability and financial implications will need to be considered. • There is a local community traffic strategy that should be taken into consideration. 	<p>Ref 12, 20, 59, 71, 76, 78, 85, 89, 90, 96, 144, 147, 159, 165, 179, 180, 181, 195, 213, 215, 219, 243a, 243b, 258, 263, 267, 274, 276, 305, 314, 317, 339, 384</p>

Key Themes	Theme References
<p><i>Enhancing Pedestrian and Cycle Access:</i> General support for enhancing cycling and walking routes as being fundamental to enabling delivery. Development at Western Harbour would be a concern without improvements to east-west active travel links and need to retain access to the waterfront. Further improvements to cycling and walking routes are limited without significant traffic reduction and road space allocation. Improvements will be necessary for a clean air zone.</p>	<p>Ref 76, 78, 165, 180, 215, 253, 285, 397</p>
<p><i>Retention of Maritime Industry at Underfall Yard:</i> General support for protection and safeguarding of these industries (as per adopted policy BCAP8) as there is a city-wide shortage of light industrial space. Respondents considered the area between Bond Warehouse, the cut and historic dock buildings should be reserved for the Harbour Railway. Consider Coronation Road, Underfall Yard and Marina should be protected under PIWA policy, as there is a city-wide shortage of light industrial space. Agent of change should apply to any future residential.</p>	<p>Ref 59, 78, 85, 96, 117, 130, 137, 165, 180, 203, 215, 226, 258, 259, 339</p>
<p>Area/Site Specific considerations:</p> <ul style="list-style-type: none"> • <i>Hotwells:</i> There was a general objection to tall buildings within this area, as this would impact the character. Necessary to return to low-rise, varied architecture, with a need to preserve existing retail and leisure uses where these exist. • <i>Spike Island and Ashton:</i> Strong need to preserve open space (New Cut preserve open space). and the scale of low rise-buildings which would enable the Bond warehouse buildings to retain their scale. • <i>Avon Crescent:</i> Need to restore and enhance the character of the area, including unlocking green space/permeability. • <i>Caravan Site:</i> Three responses identified that there is a need to protect the Caravan site as a year-round income for the Harbour Area. This feature also offers an important cultural/tourist offer for the City. • <i>Bond Warehouse, Thomas Ware Tannery and Payne's Shipyard:</i> One respondent identified that redevelopment of the site represents a key opportunity. 	<p>Ref 20, 59, 71, 213, 215, 267, 276, 339, 389, 413</p>
<p>Other sub-themes:</p> <ul style="list-style-type: none"> • Character and Design: <ul style="list-style-type: none"> • Covered in a large number of responses. Respondents considered that no damage is done to heritage assets (namely the Suspension Bridge, Bond Warehouses, Avon Crescent, Ashton Avenue houses, Plimsoll Bridge, Brunel Swivel Bridge, Nova Scotia and Underfall Yard). • The setting of and views to these assets needs to be restored; the character of the area contributes to attractiveness as a tourist and business destination. Some responses considered that the impact of the proposed development was not considered in enough detail and the reference to preserving character is vague (3.1.21). • Requested that Policy BCAP41 is retained as a means to understand the historic value of the area. • Must reference Section 66 and Section 72 of the Planning and Listed Building Act, alongside Paragraph 131, 132, 134 and 137 of the NPPF. • It was considered necessary to allow for new development to relate to existing or surrounding developments, tall buildings should not be 	<p>Ref 20, 57, 59, 71, 76, 78, 85, 89, 95, 106, 111, 117, 147, 159, 165, 179, 180, 181, 187, 195, 203, 213, 215, 219, 226, 253, 258, 259, 263, 267, 304, 317, 333, 339, 345, 378, 389</p>

Key Themes	Theme References
<p>considered appropriate.</p> <ul style="list-style-type: none"> • Flood Risk: Tidal flood risk and sea level risk in this area is a concern for proposed development. Development should only take place after extensive mitigation measures are in place. This proposal contravenes BCAP5 and BCS16. • Environment and ecology: White City Allotments, the Avon New Cut Local Nature Reserve, open space around the Cumberland Basin, space adjacent to Brunel Way must be taken into consideration, protected and enhanced. • Green Space: Including Brunel Way for development is unacceptable. Development should take place on brownfield land within the area. The Harbour should provide Green Lungs to the City. • Air Pollution: Plans to environmentally improve air quality need to be part of the Western Harbour area. 	

Comments from statutory bodies and partnerships:

Table 14 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Historic England notes the ambition for the hugely significant historic area of the City.</p> <ul style="list-style-type: none"> • <i>Evidence Base:</i> The significance should be fully understood to inform the scope, location, form and capacity ensuring the risk of harm to the effected heritage assets is minimised and the potential benefits are fully realised. This evidence should be in the form of a Historic Environmental Assessment (with key view analysis, characterisation and heritage asset setting evaluation). The City Docks Conservation Appraisal and Management Proposals (BCC 2011) and the City's Historic Environment Record hold valuable information on the historic significance of this area and individual assets, and Historic England's Conservation Principles will help to establish the evidential, historical, aesthetic, and communal values of the area. • <i>Clarity of Proposals:</i> The proposal needs to be clearer in what its proposing: is there a suitable alternative for a replacement bridge and would this result in less blight? How has the scheme moved on from the less dramatic proposals suggested within the Bristol Central Area Plan (2015)? • <i>Further Engagement:</i> Historic England would welcome the opportunity to discuss this project due to the national significance of the docks, floating harbour and setting of the Avon Gorge and suspension bridge. 	Ref 246
<p>North Somerset Council: request to consult North Somerset Council on any proposed changes to road network as this is one of the main routes to/from Bristol for North Somerset residents and businesses.</p>	Ref 305
<p>Wessex Water: Changes to Cumberland basin will require consultation with Wessex Water to consider the implication upon existing assets and opportunities for improvements. Response confirmed technical requirements for consultation in respect of sewers and the preferred approach to surface water drainage and sewerage.</p>	Ref 345

9. East Bristol: Focus for development

Overview: In total, 6 respondents made more general comments regarding East Bristol. Of these, no comments were in general support of the proposal, 3 were in general objection to the proposal and 3 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 15 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>Sensitive Infill, Conversion of Buildings and Redevelopment of Underused Sites: Comments in objection primarily raised concern that the proposal would lead to eventual permanent loss of employment sites, even if not intended, due to the incompatibility of such uses with introducing residential elements. It was raised that the proposal may place additional burdens on existing businesses that could threaten their operations and only those not creating adverse impacts on residential uses would survive. Landlords would also only offer short term leases due to potential planning gain in long term. It was considered that the need for sustainable, mixed employment sites should be a plan priority.</p>	Ref 117, 203, 226
<p>Site Specific: Two sites were mentioned in responses. One stated that Crews Hole Road (on map at 3.2.4) could be suited to live/work accommodation, while another highlighted that Duchess Fields should be considered an allocated site within Section 3.2 of the Plan.</p>	Ref 29, 409

Comments from statutory bodies and partnerships:

Table 16 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Highways England: There is potential for development in this area to impact on the strategic road network (SRN), notably the M32 but also M4 and M5. A transport assessment would establish the severity and nature of this impact and allow demonstration of the benefits of the mitigation package.</p>	Ref 336

10. CDS5: Lawrence Hill

Overview: In total, 20 respondents made comments regarding CDS5: Lawrence Hill. Of these, 6 comments were in general support of the proposal, 10 were in general objection to the proposal and 4 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 17 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>General Principle of Development: Comments on the principle of development raised concern over the loss of industrial and employment land and objected to the principle of their loss in the proposal. Two comments supported the proposal in principle.</p>	Ref 78, 180, 345, 397, 430, 431
<p>Redevelopment of underused or industrial and warehousing uses for housing as these become available: One respondent was supportive of this approach, provided new development was sufficiently high density to justify the loss of employment land. Another suggested temporary housing would be suitable as a quick solution prior to development through the urban living approach.</p> <p>Comments in objection primarily raised concern that the proposal would lead to eventual permanent loss of employment sites, even if not intended, due to</p>	Ref 13, 78, 117, 180, 203, 226, 243(b),273

Key Themes	Theme References
<p>the incompatibility of such uses with introducing residential elements. It was raised that the proposal may place additional burdens on existing businesses that could threaten their operations and only those not creating adverse impacts on residential uses would survive. Landlords would also</p> <p>Landlords may only offer short term leases due to potential planning gain in the long term. It was considered that the need for sustainable, mixed employment sites should be a plan priority.</p> <p>One respondent was concerned about the lack of reference to school provision and requirements in the surrounding area if residential development in the area occurred.</p>	
<p>Reconfiguring roundabout and pedestrian and cycle improvements:</p> <ul style="list-style-type: none"> • Respondents supported the reconfiguration of the roundabout and recognised a need for improvements, including to cycle and walking provision. • A specific mention of the Railway Path corridor and its importance to active travel to east Bristol was requested. • It was requested that provision of cycle/pedestrian routes should be attractive and not on major roads, while another respondent suggested they should be on each radial road through the area and of a high quality. 	Ref 253, 317, 397, 431
<p>Tall Buildings: one respondent supported tall buildings in Lawrence Hill while another expressed concern about them.</p>	Ref 13, 267
<p>Site Specific: One respondent stated that as a landowner in Lawrence Hill Industrial Area, they would like to work with other landowners on a strategy, and favoured high density development in the area.</p> <p>Another respondent stated that Duchess Fields should be identified as an allocated site.</p>	Ref 13, 409
<p>Advertising: Several respondents raised concern with the level of advertising (billboards and digital) in the Lawrence Hill area in comparison to other areas of the city such as Clifton, and the harmful impact of this on residential amenity.</p>	Ref 168, 238, 292

Comments from statutory bodies and partnerships:

Table 18 Comments from statutory bodies and partnerships

Consultee	Reference
<p>South Gloucestershire Council identified that their Local Plan was also looking to increase housing numbers in the adjoining urban communities through new approach to urban living. Therefore there are a number of issues which will need to be considered together.</p> <p><i>Transport:</i> Working jointly with BCC and South Gloucestershire Council, consider appropriate public transport and other transport infrastructure improvements which will benefit new and existing communities of both Bristol and South Gloucestershire to mitigate additional housing growth, address existing congestion issues and significant commuter flows on the East fringes of the urban area.</p> <p><i>Infrastructure:</i> There is a need for continuing co-operation between BCC and South Gloucestershire to identify the impact of housing growth on the</p>	Ref 428

Consultee	Reference
<p>strategic need for infrastructure (particularly in relation to new and special school places where there are cross-boundary movements of children).</p> <p><i>Employment Opportunities:</i> South Gloucestershire Council consider that the impact on employment opportunities in these areas are considered in the context of the loss of employment land resulting from redevelopment to residential uses and mitigated through appropriate local safeguarding and new types of employment provision.</p>	
<p>Highways England: There is potential for development in this area to impact on the SRN, notably the M32 but also M4 and M5. A transport assessment would establish the severity and nature of this impact and allow demonstration of the benefits of the mitigation package.</p>	Ref 336

11. CDS6: Fishponds

Overview: In total, 13 respondents made comments regarding CDS6: Fishponds. Of these, 3 comments were in general support of the proposal, 8 were in general objection to the proposal and 2 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 19 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>General Principle of Development: Two respondents made comments in support of the principle of development, and one noted particular support of regeneration of two sites, Beacon Tower and St Matthias college.</p> <p>Comments in objection primarily raised concern that the proposal would lead to eventual permanent loss of employment sites in the area, even if not intended, due to the incompatibility of such uses with introducing residential elements. It was raised that the proposal may place additional burdens on existing businesses that could threaten their operations and only those not creating adverse impacts on residential uses would survive. Landlords would also only offer short term leases due to potential planning gain in long term. It was considered that the need for sustainable, mixed employment sites should be a plan priority.</p> <p>Another concern raised was the potential for overdevelopment of the area, with subsequent harmful impacts on the environment and infrastructure.</p>	Ref 9, 78, 117, 180, 203, 226, 345, 416, 430
<p>Tall Buildings: Two respondents raised concern about the impact and suitability of tall buildings in Fishponds, including South Gloucestershire Council (see table below).</p>	Ref 267, 428
<p>Student Housing: Concern was raised that there is already too much student housing in areas of Fishponds and that this should be restricted; an example was provided of the Trendlewood estate in Fishponds, which the respondent considers has too many lettings to UWE students and should be limited to protect residential balance.</p>	Ref 9
<p>Site Specific: The issue of overdevelopment was raised in relation to the Blackberry Hill site, with the respondent considering it an example of hundreds of homes being delivered without sufficient additional infrastructure provision.</p>	Ref 9

Key Themes	Theme References
<p>Environment: One comment was concerned that development in Fishponds may reverse recent improvements to local flora and fauna, including the presence of otters in the River Frome and Eastville Park (after a 50 year absence) and new tree planting.</p> <p>Another comment was concerned that development would need to be accompanied by public transport upgrades to protect AQMAs in Kingswood and South Gloucestershire.</p>	Ref 9, 431
<p>Infrastructure and Transport: One respondent expressed a desire to see a proposal commitment to improving walking and cycling facilities along Fishponds Road and to the Railway Path to support proposed development in the area.</p> <p>Another respondent expressed concern that existing and ongoing development has already resulted in parking pressure in the area which prevents access to service and emergency vehicles.</p>	Ref 9, 397

Comments from statutory bodies and partnerships:

[Table 20 Comments from statutory bodies and partnerships](#)

Consultee	Reference
<p>South Gloucestershire Council: identified that their Local Plan was also looking to increase housing numbers in the adjoining urban communities through new approach to urban living. Therefore there are a number of issues which needed to be considered together.</p> <ul style="list-style-type: none"> • <i>Transport:</i> Working jointly with BCC and South Gloucestershire Council, consider appropriate public transport and other transport infrastructure improvements which will benefit new and existing communities of both Bristol and South Gloucestershire to mitigate additional housing growth, address existing congestion issues and significant commuter flows on the East fringes of the urban area. • <i>Employment Opportunities:</i> South Gloucestershire Council consider that the impact on employment opportunities in these areas are considered in the context of the loss of employment land resulting from redevelopment to residential uses and mitigated through appropriate local safeguarding and new types of employment provision. • <i>Infrastructure:</i> There is a need for continuing co-operation between BCC and South Gloucestershire to identify the impact of housing growth on the strategic need for infrastructure (particularly in relation to new and special school places where there are cross-boundary movements of children). • <i>Taller Buildings:</i> South Gloucestershire Council consider that the landscape impact of taller buildings in Fishponds will be significant due to the prominence of this location in wider views across Bristol and South Gloucestershire and that this should be explicitly addressed through the proposal and design guidance. 	Ref 428
<p>Wessex Water response confirmed technical requirements for consultation in respect of sewers and the preferred approach to surface water drainage and sewerage.</p>	Ref 345

12. South Bristol: Focus for Development

Overview: In total, 18 respondents made comments regarding South Bristol. Of these, 7 comments were in general support of the proposal, 5 were in general objection to the proposal and 6 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 21 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>General Principle of Development: Of those supporting the general principle, comments referred to south Bristol's suitability for strategic development and growth due to its sustainable location and available land.</p> <p>Concerns were raised that the proposal neglects economic development in south Bristol and would not address long-term unemployment or socio-economic deprivation of the area. It is considered by some respondents that there is a lack of a co-ordinated or integrated approach to south Bristol as well as a lack of political focus. A need for employment land in Whitchurch was specifically raised by one respondent, while another comment referred to the need for improved active travel links (particularly across the River Avon) to support the development proposals.</p> <p>One comment raised objection to tall buildings in south Bristol and another comment put forward land west of Ashton Gate Stadium as a suitable location for allocated development.</p>	<p>Ref 31, 121, 245, 267, 287, 298, 317, 321, 336, 343, 360, 361, 362, 371, 397, 431</p>
<p>Focus for 11,000 new homes: A comment in support stated that south Bristol is suited to an urban living approach and has significant potential to deliver housing.</p> <p>Other comments raised concern that the housing delivery would need to be supported with a transport strategy and sufficient employment land allocations in order to be sustainable.</p>	<p>Ref 274, 298, 343,</p>

Comments from statutory bodies and partnerships:

Table 22 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Wessex Water response confirmed technical requirements for consultation in respect of sewers and the preferred approach to surface water drainage and sewerage.</p>	<p>Ref 345</p>
<p>Highways England considered there is potential for development in this area to impact on the SRN, notably the M32 but also M4 and M5. A transport assessment would establish the severity and nature of this impact and allow demonstration of the benefits of the mitigation package.</p>	<p>Ref 336</p>

13. CDS7: Central Bedminster

Overview: In total, 95 respondents made comments regarding CDS7: Central Bedminster. Of these, 9 comments were in general support of the proposal, 77 were in general objection to the proposal and 9 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 23 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>General Principle of Development: Comments regarding the principle of development proposed in Central Bedminster generally recognised the opportunity and need for some regeneration and development in the area.</p> <p>However, many objected to the scale of development proposed with regards to housing numbers, density and height. Reference was made to the existing character of the area as being urban rather than inner-city, and concern that the proposal would result in an inner-city scale and character of development. Some concerns were raised about the type of housing that would be provided and who it would benefit; in particular concern that it would not address the housing crisis but benefit investors or landlords. The ability of the area to accommodate the scale of development was also questioned with regards to infrastructure and services.</p>	<p>Ref 1, 8, 11, 14, 16, 23, 35, 48, 60, 64, 66, 69, 72, 73, 75, 77, 86, 92, 98, 107, 108, 110, 113, 116, 119, 133, 139, 143, 146, 148, 155, 156, 158, 161, 166, 167, 170, 176, 188, 189, 191, 192, 193, 197, 200, 205, 210, 214, 221, 223, 224, 230, 233, 237, 244, 311, 312, 334, 341, 345, 346, 360, 361, 362, 368, 371, 380, 390, 395, 396</p>
<p>Focus for 2,200 Homes:</p> <ul style="list-style-type: none"> • There was general recognition and a level of support for new housing in the area amongst respondents. However, the type and tenure of this housing was a common concern, with many respondents seeking development to provide a high level (or even, exclusively) affordable, social rent or community housing, as well as homes suitable for families and the elderly. • Other comments suggested a threshold approach to affordable housing such as in the BCC Affordable Housing Practice Note. • More clarity on the distribution of homes across individual sites was requested. 	<p>Ref 23, 108, 140, 155, 193, 210, 214, 267, 311, 312, 334, 341, 360, 361, 362, 371, 380</p>
<p>High Density and Tall buildings: There were some general expressions of support for tall buildings and higher density in Central Bedminster, however the majority of comments were in objection.</p> <p>The objection comments raised concern about the impact of high density and tall development on the character and environment of the area, and consider it inappropriate. Objections specific to tall buildings included their harmful social impact/social isolation; that they are unlikely to provide a suitable mix of homes including for families and the elderly; that they will impact views in Bristol and from Windmill Hill; like the 1960s tower blocks which ultimately failed.</p> <p>Many comments stated that alternative approaches should be considered, including high density mid-rise and terraced housing. Wapping Wharf and Paintworks were highlighted as good examples</p>	<p>Ref 1, 8, 11, 14, 16, 22, 23, 35, 48, 50, 54, 60, 64, 66, 69, 72, 73, 75, 77, 86, 92, 98, 106, 107, 108, 110, 113, 116, 119, 131, 133, 139, 140, 143, 146, 148, 155, 156, 158, 161, 166, 167, 170, 171, 176, 188, 189, 191, 192, 193, 197, 200, 205, 210, 214, 218, 221, 223, 224, 229, 230, 233, 237, 244, 285, 304, 307, 311, 312, 341, 346, 360, 361, 362, 368, 371, 380, 390, 395, 431, 441</p>

Key Themes	Theme References
of higher density development that would be appropriate in Bedminster.	
<p>Redevelopment of some industrial and warehousing land in the Whitehouse Lane area: There was some support for the redevelopment of existing employment space; one respondent stated that this should include North Street and the Old Brewery site, while another stated that this should prioritise development in Flood Zone 1, over Zone 2 and 3.</p> <p>A considerable number of comments objected to the principle of losing employment space for homes, while others felt that residential and employment uses in close proximity would be incompatible and result in any remaining employment premises being lost, or their viability threatened, in the long-term.</p>	Ref 11, 14, 16, 23, 35, 48, 60, 64, 66, 69, 72, 73, 78, 86, 92, 98, 107, 108, 110, 113, 116, 117, 119, 143, 146, 148, 156, 161, 170, 176, 180, 188, 189, 191, 192, 193, 197, 203, 214, 221, 223, 224, 226, 233, 244, 307, 311, 334, 346, 368, 371, 380, 390
<p>Improvements to connections between East Street, Dalby Avenue and Bedminster Station: Comments generally recognised a need for regeneration in this area, but stated that it should be of an appropriate scale that respects the context and demographics of the area. Some comments expressed that the area of land between Whitehouse Street and Dalby Avenue should be a soft landscaped space and protected as such.</p>	Ref 191, 200, 244, 311
<p>Improved environment around Parson Street Station: Comments generally recognised a need for regeneration in this area, but stated that it should be of an appropriate scale that respects the context and demographics of the area.</p> <p>The need for new disabled access to the station was raised, as was the need for increased services at the station if it is to accommodate an increased population and encourage sustainable commuting. One comment stated that Parson Street should not be subject to an urban living approach as it is of a different character.</p>	Ref 200, 274, 378, 431
<p>Site Specific:</p> <ul style="list-style-type: none"> • Some comments referenced specific sites. St Catherine's Place was referenced as an existing consent for a tall building that received substantial objection. • Many comments related to Bedminster Green and raised concern about the type of development being sought by developers there, with some referring to an existing Community Planning Brief for the area which should be considered. Some comments stated that Bedminster Green should be identified as a specific key opportunity area for development due to its sustainable location. • A comment relating to the Old Brewery on North Street stated it should be included in Proposal CDS7. 	Ref 16, 75, 92, 191, 200, 210, 244, 311, 341, 360, 361, 362, 371
<p>Transport, Parking and Air Quality: Comments raised concern that the Central Bedminster area is not served by sufficient or high quality public transport to support the proposed level of growth, and that it would also exacerbate existing parking problems.</p> <p>Related to this, many comments raised concern that development</p>	Ref 1, 8, 11, 14, 16, 23, 35, 48, 54, 60, 64, 66, 69, 72, 73, 75, 86, 92, 98, 107, 108, 110, 113, 116, 119, 137, 139, 143, 155, 146, 148, 156, 161, 170, 171, 176, 188, 189, 192, 197,

Key Themes	Theme References
would worsen air quality, noting that Central Bedminster already exceeds legal levels of air pollution.	214, 221, 224, 229, 233, 237, 307, 341, 346, 368, 378, 390
Infrastructure: A large proportion of respondents raised concerns about the impact of development in infrastructure, including schools and GPs, stating that there is currently insufficient provision which will not cope with additional demand. Subsequently, any large scale development must provide appropriate infrastructure.	Ref 8, 11, 14, 16, 23, 35, 48, 50, 54, 60, 64, 66, 69, 72, 73, 77, 86, 98, 107, 108, 110, 113, 116, 119, 131, 133, 139, 140, 143, 146, 148, 155, 156, 161, 166, 167, 170, 171, 176, 188, 189, 191, 192, 193, 197, 200, 205, 214, 221, 223, 224, 229, 233, 244, 307, 346, 368, 390, 395, 441
Historic Character: The impact of the proposals on the unique historic character of Bedminster was a concern raised by many respondents.	Ref 1, 8, 11, 14, 16, 23, 35, 48, 50, 60, 64, 66, 69, 72, 73, 86, 98, 107, 108, 110, 113, 116, 119, 131, 140, 143, 146, 148, 155, 156, 157, 161, 167, 170, 176, 188, 189, 192, 193, 197, 205, 214, 221, 223, 224, 233, 346, 368
Masterplan: The need for a 'joined up' masterplan approach to development in the area was raised by a large proportion of respondents. This should be prepared in collaboration with the local community and stakeholders and could take the form of an SPD.	Ref 11, 14, 16, 23, 35, 48, 50, 54, 60, 64, 66, 69, 72, 73, 75, 77, 86, 92, 98, 107, 108, 110, 113, 116, 119, 140, 143, 146, 148, 155, 156, 161, 167, 170, 171, 176, 188, 189, 191, 192, 193, 197, 210, 214, 221, 223, 224, 229, 233, 237, 244, 307, 312, 317, 346, 368, 378, 390, 395
Other topics: Comments were also received on the following issues: <ul style="list-style-type: none"> • Impact on and the need for open spaces. • Impact on East Street as a retail centre. • Impact on the existing community and the need to consult them on future plans. • The environment and leisure opportunities available if the River Malago was opened up as part of redevelopment in the area. • The opportunity to embrace green technology on a large scale in the area. • The potential to provide student housing to alleviate issues in other city areas and provide for new the Temple Quarter Enterprise Campus. 	Ref 8, 64, 75, 92, 131, 210, 218, 221, 229, 237, 307, 311, 368

Comments from statutory bodies and partnerships:

Table 24 Comments from statutory bodies and partnerships

Consultee	Reference
Wessex Water: response confirmed technical requirements for consultation in respect of sewers and the preferred approach to surface water drainage and sewerage.	Ref 345

14. CDS8: Brislington

Overview: In total, 18 respondents made comments CDS8: Brislington. Of these, 2 comments were in general support of the proposal, 10 were in general objection to the proposal and 6 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 25 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>General Principle of Development and Focus for 350 Homes: Of those supporting the general principle, some comments also referred to the need for new and regenerated employment land including Brislington Trading Estate and Brislington Shopping Centre. One comment stated that development in the area should be higher density than proposed.</p> <p>Of those in objection, concerns were raised over the loss of the suburban character of Brislington, the quality of residential development (particularly along the A4), potential for tall buildings in the area and the loss of employment/industrial land to residential use.</p>	Ref 151, 267, 268, 269, 324, 343, 430, 431
<p>Re-use of vacant or underused industrial and warehousing land around the A4 Bath Road: The re-use of vacant or underused employment land was supported by some respondents as more efficient use of land.</p> <p>Some respondents objected to the principle of losing employment space for homes on the basis that residential and employment uses in close proximity would be incompatible and result in any remaining employment premises being lost, or their viability threatened, in the long-term.</p>	Ref 78, 117, 180, 203, 226, 268, 269
<p>Transport and Infrastructure: Some concerns were raised regarding potential new road infrastructure in the area and the potential for increasing already high air pollution levels. The need for infrastructure in line with development and potential for improved pedestrian and cycle routes as well as green space was also raised.</p>	Ref 33, 285, 351, 416

Comments from statutory bodies and partnerships:

Table 26 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Wessex Water: response confirmed technical requirements for consultation in respect of sewers and the preferred approach to surface water drainage and sewerage.</p>	Ref 345

15. CDS9: New Neighbourhood at Bath Road

Overview: In total, 29 respondents made comments with regard to CDS9: New Neighbourhood at Bath Road. Of these, 10 comments were in general support of the proposal, 9 were in general objection to the proposal and 10 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 27 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>General Principle of Development and Focus for 750 Homes: Of those in support of the principle of the proposal and residential use, few comments suggested that the site should be larger and incorporate land from within B&NES local authority. It was also suggested that a mixed use development would help provide sustainable access to employment and community facilities.</p> <p>Of those objecting, concerns raised were the loss of green belt land, the additional pressure on transport and infrastructure, and objection to tall buildings on the site. A specific concern was also raised about old mine workings in the vicinity and their heritage value.</p>	Ref 33, 62, 80, 267, 268, 269, 274, 280, 324, 345, 378, 390, 398, 400, 406, 407, 416, 415, 431
<p>Affordable Housing Requirement of 40%: Two respondents expressed concern that the 40% target is enforced and not reduced through viability issues raised by developers.</p> <p>Two respondents objected to the target on the basis that it is not sufficiently evidenced and is an 'arbitrary' figure given that the JSP and Proposal ULH2 refer to a minimum target of 35%.</p>	Ref 251, 268, 274, 400
<p>Retention of Allotments: There was strong support for this aspect of the proposal, which respondents suggested should also include the garden centre and should be factored into the masterplanning of the site at an early stage. One comment stated that there should be ambition to further increase the provision of allotments.</p>	Ref 203, 251, 255, 297, 351, 370, 431
<p>Green Belt Boundary Revision: Some comments were received that accepted the loss of Green Belt in this location and stated that any development should enhance nature in the surrounding area. One comment objected on the basis that a larger area should be removed.</p> <p>Those in strong objection considered that there is sufficient brownfield to be used first and raised concern that it would reduce the gap between Bristol and Keynsham. A sequential approach to the use of Green Belt was suggested, as was a priority to improve degraded Green Belt land for access, woodland and food growing rather than development.</p>	Ref 255, 268, 269, 324, 337
<p>Traffic, Infrastructure and Air Quality: All comments received on this topic raised concerns over the impact of development in exacerbating existing poor air quality and congestion issues. They stated that major infrastructure improvements would be needed such as Metrobus and using targeted financial contributions from development. Others highlighted the need for sustainable/active transport infrastructure which is not mentioned in the proposal.</p>	Ref 33, 80, 102, 121, 253, 268, 431

Comments from statutory bodies and partnerships:

Table 28 Comments from statutory bodies and partnerships

Consultee	Reference
Wessex Water: response confirmed technical requirements for consultation in respect of sewers and the preferred approach to surface water drainage and sewerage.	Ref 345

16. Hengrove and Knowle West

Overview: In total, 12 respondents made comments with regard to Hengrove and Knowle West. Of these, 2 comments were in general support of the proposal, 2 were in general objection to the proposal and 8 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 29 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
General Principle of Development: Comments were generally supportive, however these stated a need to ensure new housing is affordable and for local people, and that there should be an allocation for employment land too. There was one comment concerned about tall buildings in the area.	Ref 249, 267, 287, 343
Hengrove Park, Hartcliffe Campus and Whitchurch Park Spatial Framework: A number of comments raised specific concerns, including the retention of wildlife, the need for carbon neutral development, support for protection of open space and the need to develop the site alongside Whitchurch Village Plan and include a rapid transit link to Whitchurch Park. One comment referred to a specific site as complementary to the proposal delivery – Former Whitehouse School. The issue of employment land was also raised. One comment suggested a review of the PIWA and employment land is required, while another raised concern that Hengrove Park would not have sufficient employment opportunities or would be an adequately mixed use neighbourhood.	Ref 249, 253, 287, 317, 337, 343, 431
Knowle West: Comments received generally highlighted a need for further focus and priority for regeneration at Knowle West. One comment noted that there has been no leadership body for the Knowle West Regeneration Framework since 2015. One comment objects to any additional housing on the Slopes area, while another highlighted that the Mounds in Knowle West is former landfill.	Ref 287, 317, 426 427, 431
Site Specific: The following site specific comments were received: <ul style="list-style-type: none"> • Development at Hengrove Park should not harm Filwood Broadway. • Hawkfield Business Park as having potential for mixed-use redevelopment. • Whitehouse Centre (BSA1307) / Former Whitehouse School suitable for alternative housing model such as self-build or community land trust, and potentially providing a new rugby and social club facility. 	Ref 31, 249, 287

Comments from statutory bodies and partnerships:

Table 30 Comments from statutory bodies and partnerships

Consultee	Reference
Wessex Water: response confirmed technical requirements for consultation in respect of sewers and the preferred approach to surface water drainage and sewerage.	Ref 345

17. CDS10: Revised Green Belt at South West Bristol

Overview: In total, 85 respondents made comments with regard to CDS10: Revised Green Belt at South West Bristol. Of these, 9 comments were in general support of the proposal, 64 were in general objection to the proposal and 12 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 31 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>General Principle of Green Belt Release: The majority of comments received were in objection to the principle of Green Belt release. Respondents felt that the proposal would undermine the purpose of the Green Belt and that there is insufficient justification (including a lack of 'exceptional circumstances') for its release. It was commonly stated that brownfield sites should be exhausted first, and that all existing consents for housing in Bristol should be implemented first. Some concern about the proximity to the North Somerset boundary, with potential for large cross-boundary urban sprawl.</p> <p>Of those in support of the release, some stated that there were exceptional circumstances justifying loss of Green Belt, while others recognised the need for housing.</p>	Ref 4, 15, 17, 19, 26, 32, 40, 45, 46, 47, 53, 58, 63, 65, 81, 82, 93, 96, 101, 103, 105, 118, 124, 128, 129, 134, 135, 136, 138, 150, 153, 156, 157, 160, 163, 169, 185, 196, 198, 199, 208, 212, 234, 245, 255, 258, 273, 274, 277, 287, 299, 305, 321, 330, 331, 357, 359, 390, 406, 407, 421, 422, 423, 431, 432, 433, 434, 435
<p>Ashton Vale town green, Bedminster Down common and Highridge Common: The majority of respondents commenting on this aspect of the proposal were in objection. They emphasised the amenity value of the spaces and object to the principle of their release from the Green Belt. The importance of the area around the South Bristol Crematorium was highlighted in particular, as a tranquil space with room for additional expansion in the future. The impact on Yew Tree farm was also raised as a concern.</p> <p>Some more general comments queried whether it was necessary to remove so much land from the Green Belt and requested more detail. There was little explicit support, and little mention of the specially protected local green space status proposed for these areas; rather, it was assumed that the land released would be developed.</p>	Ref 17, 46, 63, 103, 118, 129, 134, 137, 138, 150, 153, 182, 234, 245, 277, 287, 305, 321, 331, 421, 433, 434
Retention of Allotments: This was supported.	Ref 182, 297, 370
Revised Green Belt Boundary at Link Road: Some respondents supported the use of the new link road as a revised boundary in principle. However, the majority of comments were in objection on the basis that the	Ref 15, 31, 41, 81, 128, 150, 234, 253, 255, 259, 277, 299,

Key Themes	Theme References
loss of some Green Belt to the new road does not justify further loss of Green Belt. Some respondents were also concerned at the relationship of this area of Green Belt release with the North Somerset boundary and the need for consideration of cross-boundary issues.	305, 321, 331, 343, 359, 390
<p>Specific Development Locations: There was overall support in comments relating to North of Ashton Vale town green, although comments raised the need for a new station at Ashton Gate and a Metrobus link, as well as protection for Ashton Vale Industrial Estate.</p> <p>Two comments supported development of Land to the west of The Pavilions however the majority of respondents objected on the basis of harm to the viability of Yew Tree Farm and the general principle of Green Belt release.</p> <p>Two comments supported the development of Land to the west of Elsbert Drive, including a suggestion to expand the site further. One comment objected in principle.</p>	Ref 15, 182, 186, 245, 234, 277, 284, 299, 321, 359, 431
<p>Additional matters raised: Respondents commented on various other topics in relation to this proposal, which are summarised below:</p> <ul style="list-style-type: none"> • Transport and Infrastructure: likelihood of increased traffic congestion and pressure on services. Respondents highlighted that traffic and parking are already severe issues in the area and that the location of housing in the Green Belt is not sustainable, increasing commuter traffic. The need to re-open the Portishead train line was also raised. • Affordable Housing: the need for any housing to be affordable, however a doubt that Green Belt housing will deliver this – more likely to be executive homes. • Environment and Ecology: concern about impact of development on wildlife corridors and specific in the area and views to the city, such as from Dundry. • Amenity Value: many comments referenced the high amenity value of Green Belt spaces for recreation and wellbeing, particularly for deprived areas of south-west Bristol. • Employment: the need for sustainable long term employment in the area. • Flood Risk: concerns about the area of development being floodplain. 	Ref 4, 26, 32, 53, 58, 61, 63, 65, 81, 101, 129, 134, 138, 150, 183, 212, 255, 259, 277, 287, 305 Ref 4, 138, 255 Ref 45, 47, 61, 81, 93, 103, 134, 138, 153, 199, 234, 253, 277, 321, 331, 337, 357, 378, 435 Ref 32, 45, 46, 47, 101, 103, 153, 199, 212, 234, 321, 331 Ref 138 Ref 103, 258, 345, 357

Comments from statutory bodies and partnerships:

Table 32 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Wessex Water: response confirmed technical requirements for consultation in respect of sewers and the preferred approach to surface water drainage and sewerage.</p> <p>Wessex Water also noted that the redevelopment of these sites could facilitate improvements to Colliter's Brook, stating that various groups have aspirations for a project to improve the brook and it is essential to develop a holistic surface water strategy with stakeholders to deliver wider environmental gains.</p>	Ref 345

Consultee	Reference
<p>North Somerset Council:</p> <ul style="list-style-type: none"> • <i>Principle:</i> Any proposed change to Green Belt ought to be fully justified and all options for meeting identified need fully examined prior to proposing boundary changes. Just because the land is assessed as limited contribution to the Green Belt does not justify its removal. • It is not within BCC remit to adjust Green Belt boundary to correspond to new link road as much of the land is in North Somerset. Any change to the boundary to correspond solely with BCC land may not meet requirements of NPPF Para 85 for defining boundaries. • <i>Co-operation:</i> North Somerset Council would welcome opportunity to work with BCC on a common approach through respective Local Plans and possibly a future masterplan. This could extend to include considering the joint impact of future proposals to improve access to Bristol Airport and for possible A38 park and ride. • <i>Bedminster Down:</i> Query whether necessary for all land on map on p28 to be removed from Green Belt. Land at Bedminster Down could be regarded as extensive tract of land, may not fall within criteria for Local Green Space. Suggest that a strong finger of Green Belt stretching into city from North Somerset as an alternative approach which would improve recreational opportunities and enhance landscape on the ridge. • <i>Ashton Vale:</i> Land north of Ashton Vale Town Green is adjacent to area designated as an area of separation in Long Ashton Neighbourhood Plan. This should be taken into account to avoid merger with Long Ashton. • <i>Metrowest:</i> Strategic issue of the re-opening of Portishead line needs to be considered including ambition to operate 2 passenger trains per hour. To futureproof this, an alignment for a new access road into rear of Ashton Vale Industrial Estate should be safeguarded in the LP as an alternative to existing level crossing access. It could connect into the B3128 park and ride junction, continue onto south side of Longmoor Brook and connect into industrial estate via Manheim car auction northern perimeter. 	Ref 305
<p>Network Rail are conscious that CDS10 seeks to remove land from the Green Belt, which would represent the first step in the development of this land. There are two considerations which need to be made:</p> <ul style="list-style-type: none"> • Alongside MetroWest Phase 1 proposing an initial hourly passenger train service and North Somerset ambitions to upgrade the line to two passenger trains per hour, the existing freight train operations are to be maintained. • In order to futureproof this upgrade, a new access road into the rear of the Ashton Vale Road industrial estate should be safeguarded in the City Council's Local Plan as an alternative to the existing access via the level crossing. This new access road should connect into the B3128 park and ride junction and continue on the south side of Longbrook Moor where it would connect into the industrial estate. 	Ref 208

18. North Bristol

Overview: In total, 15 respondents made comments with regard to North Bristol. Of these, 5 comments were in general support of the proposal, 4 were in general objection to the proposal and 6 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 33 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
General Principle of Development: Some comments supported higher density development in North Bristol and recognised opportunities for more efficient land use. Some further detail on site allocations was requested and one comment related to the need to co-operate with South Gloucestershire Council to co-ordinate this development. More specific comments included an objection to densification of Whiteladies Road and support for focusing key industrial uses to Avonmouth.	Ref 248, 267, 336, 367, 375, 377, 378, 401
6000 New Homes: There was general support amongst respondents however a need for more detail on housing distribution was identified given that the Lockleaze and Southmead policies only identify the delivery of 1400 homes.	Ref 39, 266, 377, 431
Urban Living: Concern was raised by respondents that infill may not always be sensitive and results in loss of green space, including gardens and that while the proposal references 'good examples' of infill development, it does not detail bad examples to be avoided. The loss of family housing through subdivision was raised as a concern, and one comment requested that Henbury is included as an urban living location to align with the Urban Living SPD.	Ref 255, 289, 369, 378
Site Specific: Three sites were identified by respondents as suitable development locations: Woodgrove Road in Henbury, Wesley College and the Eastgate area. One comment expressed disappointment that there is no specific Shirehampton proposal or section in the plan and put forward ideas for the area.	Ref 39, 44, 375, 377

Comments from statutory bodies and partnerships:

Table 34 Comments from statutory bodies and partnerships

Consultee	Reference
Highways England: There is potential for development in this area to impact on the SRN, notably the M32 but also M4 and M5. A transport assessment would establish the severity and nature of this impact and allow demonstration of the benefits of the mitigation package.	Ref 336

19. CDS11: Lockleaze

Overview: In total, 6 respondents made comments with regard to CD11: Lockleaze. Of these, 3 comments were in general support of the proposal, 0 were in general objection to the proposal and 3 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 35 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
General Principle of Development, Focus for Urban Living and 1200 new homes: Comments received were supportive, in particular recognising the potential for new development and increased density to support local facilities (including Gainsborough Square as a centre), improve quality of life and potentially support a new MetroWest station at Bonnington Walk or Constable Road. The need to link development to the UWE campus and provide improved active travel infrastructure generally alongside development was highlighted.	Ref 243(b), 317, 397, 431
Stoke Park: one comment suggested that Stoke Park should be referred to in the proposal as a gateway and important green space for the city.	Ref 285
Infrastructure: respondents raised concern that any development will need to be accompanied by appropriate infrastructure including school provision and cycle and public transport improvements due to existing congestion on Muller Road and Filton Avenue.	Ref 243(b), 317

Comments from statutory bodies and partnerships:

Table 36 Comments from statutory bodies and partnerships

Consultee	Reference
Wessex Water: response confirmed technical requirements for consultation in respect of sewers and the preferred approach to surface water drainage and sewerage.	Ref 345

20. CDS12: Central Southmead and Southmead Road

Overview: In total, 7 respondents made comments with regard to CDS12: Central Southmead and Southmead Road. Of these, 5 comments were in general support of the proposal, 0 were in general objection to the proposal and 2 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 37 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
General Principle of Development: There was general support amongst respondents for development in Southmead. It was suggested that development should align with the Southmead Community Plan and priorities of the Southmead Development Trust, with suggested inclusion of references within the proposal to 'regeneration areas', a masterplan approach and an application to the Housing Infrastructure Fund. Comments also requested an emphasis within proposal on open space, public realm improvements and active and public transport improvements.	Ref 243(b), 253, 270, 317, 285, 397

Comments from statutory bodies and partnerships:

Table 38 Comments from statutory bodies and partnerships

Consultee	Reference
Wessex Water: response confirmed technical requirements for consultation in respect of sewers and the preferred approach to surface water drainage and sewerage.	Ref 345

21. Lawrence Weston Neighbourhood Plan

Overview: In total, 9 respondents made comments with regard to Lawrence Weston Neighbourhood Plan. Key themes that emerged from the responses:

Table 39 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
General Principle of Development: Respondents made varying comments on development in Lawrence Weston, including the need to protect habitats in and around Lawrence Moor and the need to improve the interrelationship between residential use and surrounding commercial and industrial uses, while also mitigating harmful impacts from this and surrounding motorway Reference was made to Lawrence Weston Neighbourhood Development Plan and Lawrence Weston Neighbourhood Design Statement.	Ref 243(b), 253, 270,317,285, 397, 407

Comments from statutory bodies and partnerships:

Table 40 Comments from statutory bodies and partnerships

Consultee	Reference
Wessex Water: Response confirmed technical requirements for consultation in respect of sewers and the preferred approach to surface water drainage and sewerage.	Ref 345
Highways England: Pleased that there are no proposals for new homes in immediate vicinity of M5 Junction 18 but note that the Lawrence Weston Neighbourhood Planning Group have developed a neighbourhood development plan that aims to deliver 300 homes in the Lawrence Weston area.	Ref 336

22. CDS13: Protecting Living Conditions Avonmouth Village

Overview: In total, 8 respondents made comments with regard to CDS13: Protecting Living Conditions Avonmouth Village. Of these, 2 comments were in general support of the proposal, 1 was in general objection to the proposal and 5 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 41 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
General Principle: Comments in support of the principle of the proposal were concerned that the area of protection and mitigation is wide enough, with suggestions that Lawrence Weston and Shirehampton should also be considered in the proposal.	Ref 44, 243b, 317, 407
Local Plan needs to recognise that Lawrence Weston is only 500 metres from industrial activity and down-wind from prevailing weather, and therefore has been strongly affected by the industrial activity on Avonmouth and Severnside. Noise pollution from the motorways is also an issue - ask for	

Key Themes	Theme References
support in mitigating this issue.	
<p>Bristol Port Company considered the proposal is incoherent and not evidenced, making unsubstantiated assertions about generic 'impacts'. Appears to be included due to local political pressure and fails to recognise existing legal regimes relevant to impacts. Refute reported incidents of nuisance and if based on the few instances the port is aware of, the proposed planning proposal would not have been effective at controlling the issue but rather this is the remit of Environment Agency.</p> <p>Current proposal would be disproportionate and interfere with the statutory undertaking of the port.</p>	Ref 326
<p>Portview Road: Two comments were received regarding Portview Road, both of which suggested that part of the site nearest the village could be redeveloped for residential use. One respondent suggested the partial removal of PIWA status to support this and redevelopment of the area north of the railway line for employment uses to mitigate any loss in other areas.</p>	Ref 285, 310
<p>HMOs: Two respondents raised concerns about the amount of HMOs in the area and the resulting impact on family homes. Suggestions to address this were put forward; the introduction of Article 4 directions, or the identification of appropriate sites for high density, small units for port and short term workers.</p>	Ref 285, 310

Comments from statutory bodies and partnerships:

[Table 42 Comments from statutory bodies and partnerships](#)

Consultee	Reference
<p>Wessex Water confirmed technical requirements for consultation in respect of sewers and the preferred approach to surface water drainage and sewerage.</p> <p>The area identified includes access routes for Wessex Water vehicles to Avonmouth sewage treatment works. Any proposed mitigation measures must not inhibit WW's ability to effectively operate the sewage treatment works which serves 0.9 million people in Bristol and Bath area.</p>	Ref 345

23. ULH1: Provision of New and Affordable Homes

Overall: In total, there were 121 responses to the content of this proposal: a total of 33 were in support of the content, 70 were objecting to the proposal, and 18 were comments neither in support nor objection to the proposal.

Key themes that emerged from the responses:

Table 43 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>Overall: There were fewer responses that supported the content of this proposal, than those objecting. Of those that supported the content, these valued the use of brownfield land to deliver homes and affordable homes, particularly within the city boundary – however, it was recognised that this should not be at the expense of development being coherent and maximising efficiency.</p> <p>Key concerns from those objecting included:</p> <ul style="list-style-type: none"> • <i>Insufficient Clarity:</i> Queried whether these figures included student housing. • <i>Housing Mix and Affordable Housing:</i> Insufficient emphasis on small family/younger professional homes and community-led housing, which are necessary to build a sustainable community. A number of respondents considered that there should be a requirement for Private Rented Accommodation within the overall housing number. • <i>Meeting housing targets over sustainable development:</i> A number of respondents considered that there was too great an emphasis on meeting housing targets over sustainable development, and the impact of such had not been considered. • <i>Minimum Targets:</i> Not meeting objectively assessed need. There were concerns that the proposal did not meet the standard objectively assessed housing need or wasn't considered to be actually meeting housing need for everyday people. Targets should be expressed as a minimum and updated to reflect any changes at the Joint Spatial Plan level. • <i>Small sites:</i> Queried why the supply of small sites was likely to be half the average delivery rate for the past 10 years. • <i>Flexibility:</i> It is necessary that the plan supports changes in housing delivery requirements set out by the West of England Housing Deal, and any changes emerging at JSP level. 	<p>Ref 34, 50, 63, 123, 158, 219, 248, 249, 250, 265, 266, 267, 269, 273, 298, 299, 301, 303, 309, 316, 317, 324, 325, 350, 354, 355, 359, 360, 361, 362, 363, 364, 365, 366, 371, 372, 374, 375, 377, 379, 380, 381, 382, 385, 386, 387, 388, 396, 407, 409, 412, 413, 417, 425, 427, 445</p>
<p>Overall support for increasing units on existing allocated sites: There was general support for increasing the density and efficient use of land on existing allocations, subject to this being appropriately tested (for example, this might not be appropriate in conservation areas).</p>	<p>Ref 187, 249, 298, 354, 361, 362, 363, 364, 372, 374, 375, 377</p>
<p>Overall object to encouraging the redevelopment of and under used office or industrial land: There were 44 responses that directly objected to the content of this proposal, stating that homes should not come at the expense of current employment space. Key concerns considered that:</p> <ul style="list-style-type: none"> • The combined impact of this proposal (amongst CDS3, CDS5, CDS6, CDS7 and CDS8) is to actively, or unintentionally, encourage the removal of employment land which could harm economic and sustainable development. The City needs to encourage development of employment uses. • Whilst these areas may appear underused, respondents highlighted that 	<p>Ref 1, 11, 14, 16, 23, 35, 48, 54, 64, 66, 69, 72, 73, 86, 98, 107, 108, 110, 113, 116, 117, 119, 129, 138, 143, 146, 148, 156, 161, 170, 176, 188, 189, 192, 193, 197, 203, 214, 221, 224, 226, 233,</p>

Key Themes	Theme References
<p>these are successful areas of local employment and form a basis for Bristol's economy. Businesses in these locations are struggling to secure long term leases (and short-term leases are unviable).</p> <ul style="list-style-type: none"> Concerns about interactions of uses and the entry of residential uses within these areas, as noise restraints make it impossible for industrial uses to be sustained. Respondents considered that the Local Plan should prioritise keeping these areas as industrial use, extending or protecting the designation. The impacts of losing these employment sites have not been considered, and should instead focus on the encouragement of job creation in local areas. Concern that proposals contained within Paragraph 4.1.6 – particularly that development proposals for former employment uses will no longer have to demonstrate an absence of demand for employment uses. Mixed-use designs can see both aims met with support through a masterplan. The proximity of employment and residential uses should be considered. <p>Comments in support considered that:</p> <ul style="list-style-type: none"> Brownfield sites should be brought forward for new homes and mixed-use developments, and the Plan should make efficient use of land within the City boundary, without having to demonstrate that employment land is no longer needed. Clarity needed about the locations which will not need to demonstrate absence of demand for employment uses and consider that this could also focus on warehousing land. 	<p>244, 245, 248, 249, 267, 269, 298, 307, 309, 316, 325, 346, 360, 365, 366, 368, 371, 372, 374, 375, 377, 380, 381, 382, 385, 386, 387, 388, 390, 407, 411, 412, 415, 427</p>
<p>Site Specific Comments included: Support for the development of tall buildings and units on KS04 (St Mary le Port); and Fire Station, Temple Back.</p>	<p>Ref 303, 372, and 374</p>
<p>Other themes:</p> <ul style="list-style-type: none"> <i>Traffic and Infrastructure:</i> Proposal needed on providing a diverse, stable housing market and affordable housing. <i>Housing type:</i> There were a larger number of comments regarding the inclusion of specific text relating to the private rented sector and 'Build for Rent' – considered that this should be referenced within ULH1, ULH10 or as a separate proposal. All new homes should be of an adequate liveable space-size. Flexible and adaptive approach to housing proposal and design can put in place solutions that help more than one group (Elderly, disabled, young people). General lack of inclusion is a cause for concern. Consider BCS 18 should have been retained. 	<p>Ref 43, 102, 112, 309, 336, 342, 372, 374</p> <p>Ref 102, 172, 177, 265, 287, 299, 301, 316, 327, 360, 361, 362, 363, 364, 370, 396, 412, 414</p>

Comments from statutory bodies and partnerships:

[Table 44 Comments from statutory bodies and partnerships](#)

Consultee	References
<p>Bristol Avon Catchment Partnership: Considered that there was a need for specific in-text changes to Section 4.0.1 for greater emphasis on climate change, and the implications of increased rainfall and increasing temperatures. The Partnership propose references which state that delivering more homes should be made through a more proactive strategy, based on increasing resilience and adaptability. The Partnership also seeks to support Green and Blue Infrastructure through new and existing developments.</p>	<p>Ref 2</p>

Consultee	References
<p>Wessex Water: Statements may not sufficiently acknowledge trade offs made in public realm which will also need to accommodate climate change impacts such as increased rainfall, intensity, and increased temperature as well as low rainfall and extreme weather events. Space is required for roads, cycle paths, cycle and car parking, green and blue infrastructure for shade, cooling, SUDs, water sensitive design and recreation. Explicit reference to resilience to climate change would be welcomed. Suggested amendment to wording (see full response).</p> <p>Support recognition in ULH1 that aspirational housing figures must be supported by sufficient infrastructure capacity. New development should be co-ordinated with required infrastructure taking into account capacity of existing infrastructure. Specific references to resilience should be included within the text, suggested amendments (see full response).</p>	Ref 345
<p>Highways England: This proposal makes no mention of requiring the necessary infrastructure to deliver them. This should be reflected in the wording of proposal going forward notwithstanding the local plan policies that are proposed to be retained.</p>	Ref 336

24. ULH2: Affordable Housing

A total of 79 respondents referred to proposal ULH2 Affordable Housing. Of these, 20 supported the content of the proposal, 24 were objecting to the content of the proposal and 35 were neither in support or object, often being in support of the principle as a whole but suggesting refinements to the target or requirements.

Table 45 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>Support: Those in support considered that affordable housing was a means to creating a connected and rebalanced community, and that greater levels of affordable housing should result in greater support for schemes. There is a need to match housing to local levels of affordability and for local workers in the City Centre.</p> <p>Main comments included:</p> <ul style="list-style-type: none"> • <i>Quantum:</i> Schemes with a higher quantum (i.e. 100%) should gain greater planning weight. The quantum needs to be linked to the Mayor's commitment to affordable housing numbers. Depending on the Plan Period and current low provision; this will result in a back-loading of affordable housing requirements (up to 70% which is unrealistic). • <i>Phasing:</i> Concerned that affordable housing would be added after the first phases of development and lead to a possible fall off in housing numbers. Affordable Housing is vital from the first phase. • <i>Private Rental Sector/Build to Rent:</i> Concerned that planned development will be built as financial investments for foreign investors. Unclear how these support the needs of everyday people. • <i>Definition:</i> Needs clarifying, social housing needed for people on low incomes not just a general definition of 'affordability'. Also, this definition will need updating based on the draft NPPF (March 2018) text on affordable housing which now includes affordable rent and sale. • <i>Enforceable:</i> The target must be enforceable, with a number of respondents identifying that developers are not providing current requirements. • <i>Locations:</i> Any release of Green Belt should result in affordable housing. 	<p>Ref 4, 5, 34, 57, 96, 174, 202, 219, 243b, 249, 250, 251, 267, 271, 272, 275, 276, 282, 287, 298, 301, 303, 309, 311, 317, 327, 338, 350, 354, 355, 358, 359, 360, 361, 362, 363, 364, 365, 366, 369, 371, 372, 374, 375, 377, 379, 384, 396, 400, 402, 409, 412, 413, 417, 419, 425, 427, 430, 443</p>
<p>Consideration of Target: Whilst there was overall support for a target, a large proportion of these responses argued that the target should be higher or lower. A number of respondents considered that sites should be assessed on a site-by-site basis. General comments highlighted:</p> <ul style="list-style-type: none"> • <i>Higher Percentage:</i> New development should support a high percentage of genuinely affordable homes, with 40% not considered to be enough (particularly in waterside locations). Developments proposing nearer 100% true affordability should receive greater weight in planning determination, with one respondent stating that a target nearer 60% would be more appropriate. • <i>Lower Target:</i> A number of respondents considered that the target was inconsistent with national proposal and without evidenced justification. The target for Affordable Housing was considered to directly inhibit ability to provide alternative affordable housing (i.e. Self-Build or Community-led). • <i>Flexible target:</i> A more flexible approach to affordable housing delivery is required in parts of the city including designated urban areas such as the 	<p>Ref 29, 94, 122, 137, 231, 239, 249, 250, 255, 260, 264, 267, 272, 274, 275, 298, 301, 303, 309, 311, 317, 350, 354, 355, 359, 360, 361, 362, 363, 364, 365, 366, 369, 371, 372, 374, 375, 377, 384, 402, 409, 413, 419, 443</p>

Key Themes	Theme References
<p>Town Centres (including Knowle). Major regeneration areas e.g. St Philips Marsh and Western Harbour should specially apportion levels of open market and affordable housing.</p> <ul style="list-style-type: none"> • <i>Too low a size threshold:</i> Recognise the need for affordable housing but threshold of 5 units and requirement for 35% Affordable Housing is counter-productive for small developments/small builders. Current requirement is not being met on small sites by developers: smaller builders do not benefit from the economies of scale that larger house-builders do, however recognised that these smaller builders make a valuable contribution to delivering housing on small, challenging sites. Recommend the minimum site size for contributions is 10 units. • <i>Need a low size threshold:</i> A threshold of four, rather than five, units would be more effective in many areas where older houses are typically converted to four units. • <i>Linkages to JSP levels:</i> Circumstances are wholly based on the JSP-levels, which has not been subject to viability testing. Amendments to the JSP need to be reflected in the Local Plan Review. 	
<p>Affordable Housing Type: A number of responses considered that creative housing delivery models should be considered within the Local Plan and the definition should be expanded. Alternative models should include the expanded definition of Affordable Housing (NPPF, March 2018) community owned land leased to home owners.</p>	Ref 88, 96, 282, 303, 311, 327, 338, 352, 361, 362, 363, 364, 369, 372, 373
<p>Article 4 Directions: These are needed to prevent loss of employment sites through prior approval (e.g. Parkview Campus) and subsequent lack of affordable housing.</p>	Ref 31
<p>Viability: A large number of respondents challenged the viability of the proposal, suggesting it was a significant change from BCS17 and this needed to have a specific viability appraisal:</p> <ul style="list-style-type: none"> • <i>Enforceable:</i> A number of responses considered that as the proposal stands, affordable provision to be offset by viability gives developers an option, and that BCC should enforce BCC-commissioned viability reviews. Publishing these documents in full should be considered as a minimum. • <i>Viability of this proposal has not been tested at JSP level:</i> There is currently a danger of the proposal being in conflict with the emerging text within the NPPF. ULH2 should be based on a target that has been appraised in terms of viability, which is likely to include a variable approach across the City. • <i>Viability of this proposal in combination with other policies:</i> The introduction of CIL, minimum space standards and renewable energy targets all impact the viability of delivering affordable housing. The 35% target has not been satisfactorily viability tested and places unacceptable blanket obligations. 	Ref 78, 117, 180, 203, 226, 245, 249, 250, 255, 298, 309, 317, 360, 361, 362, 363, 364, 365, 366, 371, 372, 374, 375, 377, 384, 417, 419, 443
<p>Connection to the Affordable Housing Planning Practice Note: Respondents considered that the adoption of the Affordable Housing Practice Note (2018) followed by ULH2 was confusing. A number of respondents considered that the blanket target within the Local Plan for 35% was not appropriate given the Affordable Housing Practice Note set out that 20% was acceptable. Respondents considered that this approach should be referenced within the proposal and should be extended to all brownfield sites in Bristol.</p>	Ref 249, 303, 311, 350, 354, 360, 361, 362, 363, 364, 365, 366, 371, 372, 374, 375, 377, 384
<p>Affordable housing in student development: Object to affordable housing</p>	Ref 219, 264, 265

Key Themes	Theme References
being available for students – these units must be for families. It was also considered to be unclear how affordable housing (C3) would be delivered within the same development or building as specialist student accommodation. Significant concerns on this approach from design and management point of view and its ability to deliver good quality accommodation. Urge BCC to engage in detail with both student housing and affordable housing providers before developing this proposal further.	

25. ULH3: Urban Living –making efficient use of land to meet our needs

Overview: A total of 113 respondents commented on this Proposal as a whole (including references to other policies). Approximately 48 respondents support the proposal overall, 23 were opposed to the proposal as a whole and 42 made comments that were not clearly support or object.

Of these 113 respondents, 83 referred explicitly to Urban Living (as opposed to subsidiary parts of the Proposal). From these 83 respondents, 46 made comments that were generally in support, 22 comments were generally objecting and 15 comments were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 46 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>Urban Living: Generally, there was support for development at higher densities and efficient use of brownfield land; however a number of respondents argued that proposals for intensification did not need to be delivered through tall buildings. Some respondents considered that Urban Living could strengthen Bristol’s position in the region and generate large capacity for Bristol. Support for proposal wording ‘locations with good accessibility to public transport corridors and routes’.</p> <p>A large number of comments generally supported higher density but not through building upward or in specific locations (referenced within CDS1-CDS13 summaries), or support was generally based on a large number of qualifications. Key concerns included:</p> <ul style="list-style-type: none"> • <i>Urban living and Sustainable and Active Travel:</i> Proposal should require new development to preserve and enhance pedestrian routes (‘permeability’), enable active travel in order to address air pollution and have access to safe, accessible recreational open spaces. Densification enables better public transport connectivity and also assists with demonstrating business cases. • <i>Design:</i> Urban living needed to be focussed on good design which would enhance local distinctiveness. Council should not underestimate challenge of encouraging households other than students/young professionals to embrace urban living/high density. • <i>Clarity of Suitable Locations:</i> Too great a focus on the City Centre. Need to focus on mixed- use regeneration of neighbourhoods across the City. Clarity is needed (ref Figure 5 in the SPD), as will not be suitable in all locations. • <i>Consider Mix of Uses:</i> Urban Living should not just focus on residential development, but commercial and employment too. 	<p>Ref 39, 43, 70, 87, 96, 114, 187, 217, 245, 246, 248, 249, 250, 253, 255, 260, 264, 265, 266, 267, 269, 273, 282, 285, 286, 287, 288, 293, 295, 298, 299, 300, 301, 303, 307, 309, 311, 316, 325, 336, 337, 338, 339, 341, 344, 345, 350, 354, 355, 360, 361, 362, 363, 364, 365, 366, 369, 371, 372, 374, 375, 377, 378, 380, 381, 382, 384, 385, 386, 387, 388, 393, 395, 396, 397, 405, 409, 411, 412, 413, 419, 425, 427, 445</p>

Key Themes	Theme References
<ul style="list-style-type: none"> • <i>Delivering liveable spaces</i>: Concerned that the proposal is wholly focussed on a supply-side approach, rather than focussing on the needs and demands of local people. Higher density should not mean small units with poor amenity. The Plan needs to set out good quality family housing (for children and elderly people) and for generous living space (for example, to enable people to use their home for working or for truly accessible homes). • <i>Clarity of Definition</i>: Unclear definition about whether this applies to all residential development, or just areas identified. Should there be a focus on just those areas of low density and should this be an average? Unclear what would represent a 'development which fails to make efficient use of land' or the spatial application of 'in and around'. • <i>Unclear Interaction with SPD</i>: Query why the SPD holds more detail on Urban Living and Tall Buildings than the proposal (i.e. 50dph requirement), given this is not subject to examination. Consider that regulations are explicit that SPD must follow the Plan Review in explaining adopted proposal requirements. • <i>Weak Assessment of Impact</i>: It was felt that the assessment of impact was not adequately covered. Tall buildings also negatively impact on the environment, impact on the setting of historic buildings and views and may impact the economy (through the number of tourists). • <i>Object to Tall buildings, consider mid-rise</i>. Tall Buildings were considered to be a disaster within the City Centre. Need to consider other non-standard alternatives (such as Community-Led Housing should be considered as alternatives). Consider Wapping Wharf or European examples of high density housing, which has not resulted in tower blocks. • <i>Viability</i>: Mix of Uses and a requirement to provide range of uses (particularly in single buildings) can affect viability and ongoing management. • <i>Infrastructure</i>: Lack of consideration of the impact of urban intensification/meeting needs on infrastructure or the impact on community (such as resilience, parking, accessibility, child safety, access to open space). Need the proposal to consider the impact on the SRN and local roads. • One respondent set out that there was too much focus on Brownfield Sites, and that Greenfield sites should be considered. • A number of respondents considered that there should be an exception to the national space standards in the Local Plan for Community-led Housing. 	
<p>Site Specific: Whilst specific reference was made to tall buildings in policies CDS1-CDS13 (where relevant), additional sites were referenced as:</p> <ul style="list-style-type: none"> • Hawkfield Business Park would represent opportunity for ULH3 approach to redevelopment. • UoB precinct should be included to in principle agreement for a tall building on Tyndall Avenue. • Very concerned that this will edge towards Hengrove, Inns Court and Hartcliffe Way, perhaps through speculative planning applications based on the current content. 	
<p>Adopted Policies and Other Policy Themes:</p>	<p>Ref 3, 6, 7, 18, 24,</p>

Key Themes	Theme References
<ul style="list-style-type: none"> • BCS21: Approximately 25 respondents commented that Policy BCS21 should be retained and not changed through the Local Plan Review. Most of these respondents considered that references to temporary and permanent public art should be retained within the Local Plan and future SPDs, and that BCC should consider a Public Arts officer. • One respondent was concerned about loss of three urban design concepts in para 8.5 of the BCAP. • DM26: A number of residents considered that reference to local character is needed to protect the character of large areas of the city which do not have a conservation area status. This is critical when considering what is acceptable in terms of densification. • Green Space: One respondent considered that open space standards should be included within the urban intensification. • Sustainable Development and Resilience: Needs to be stronger in terms of sustainable transport and sustainable planning. Existing policies on cycle and pedestrian facilities (e.g. BCAP29 and BCAP30) could be revisited, and reference to resilience throughout needs to be enhanced. • Waste and Management: Appropriate provision should be made at the design stage for waste management if density is anticipated to increase in the City Centre. 	27, 28, 36, 37, 42, 56, 74, 75, 115, 162, 178, 187, 194, 207, 247, 253, 259, 262, 285, 286, 288, 337, 348, 350, 351, 353, 378, 407, 414, 442

Comments from statutory bodies and partnerships:

Table 47 Comments from statutory bodies and partnerships

Consultee	References
Bristol Avon Catchment Partnership seeks the inclusion of the creating a liveable environment which is adaptable to climate change as a justification within Proposal ULH3. BACP states that BCS21 may not sufficiently acknowledge the proportional impacts of climate change.	Ref 2
Historic England welcome the commitment to high quality urban design to inform an efficient use of land, encouraging the development of vacant underutilised sites. If carefully planned, this will safeguard and enhance the city's renowned historic places and spaces. Suggest that Proposal ULH3 refers explicitly to the matter " <i>New Development will be expected to reflect Bristol's Urban Character and the <u>significance of its heritage assets</u></i> ".	Ref 246
Highways England: Support, however suggest that it may be necessary to have further policies to manage car parking and car ownership to increase reliance and provision of alternative modes and minimise impact on SRN and local road network.	Ref 336
Environment Agency considered essential that blue/green infrastructure is incorporated into the use of space. Multi-functional green/blue infrastructure can provide multiple benefits including amenity and health, together with a range of environmental benefits. Development in the vicinity of the river corridor should endeavour to revitalise rivers for people and wildlife, considering opportunities for de-culverting and associated enhancements.	Ref 405
Wessex Water: specific reference should be made to resilience and climate change. Suggested amendments (see full response).	Ref 345
BCS21: BCS21 may not sufficiently acknowledge the proportional impacts of climate change. Recommend that sufficient space is allowed in the design of the urban environment to accommodate adequate measures to deliver	

<p>multifunctional surface water drainage attenuation and green infrastructure. Systems should be designed and implemented to delivery multiple environmental benefits such as water use efficiency, water quality, biodiversity, amenity and recreational improvements.</p>	
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26. ULH4: Tall Buildings

There were 99 respondents that explicitly spoke about ULH4 or the concept of Tall Buildings. 50 people objected to the content of the proposal, 40 were in support and 9 respondents were neither in support or object of the proposal.

Key themes that emerged from the responses:

Table 48 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>General Principle: Whilst there was support for maximising the efficient use of brownfield land and increasing the density of new housing development, the concept of tall buildings was opposed. Supporters considered that tall buildings could make an appropriate contribution to the built environment and skylines, and height should be up to 50 or 60 floors to represent a 'step-change'. Units could have space for gyms, play areas, food halls and social areas to enable a real community to exist. A limited number of respondents supported tall buildings out-of centre where they may contribute to viability and vitality of local centres.</p> <p>A number of people supported higher densities, but considered that tall buildings were not appropriate. Key challenges to the proposal included:</p> <ul style="list-style-type: none"> • <i>SPD content:</i> Repeat concerns that Urban Living SPD will be used to deliver development management policies, and is not subject to examination which is particularly important for determining the viability impacts. • <i>Tall buildings are not a feature of Bristol:</i> Tall buildings were considered to be out with the current character of Bristol and will diminish Bristol's visual identity. How high will these be – and how do these align with the local topography? Respondents considered that there is a need to learn lessons from the 60's. • <i>Focus on Mid-rise Development or other alternatives:</i> Strong objection to Tall Buildings for housing. These are unacceptable: buildings should not be more than mid-rise in height. Wapping Wharf considered to be an example which integrates well into the existing space. • <i>Environmental Social impact not considered:</i> The impact of taller buildings on creating community spaces has not been assessed, nor has the place-making impact. High buildings can destroy communities, present high building/servicing/maintenance costs and can present evacuation risks in emergencies. Tall buildings have a negative environmental impact on their immediate neighbourhood, encourage social division, impact the setting of historic buildings and will obscure views. Tall buildings are therefore not considered to be appropriate for family housing. • <i>Unclear justification:</i> Unclear why tall buildings are necessary. May not achieve desired yields from tall buildings. • <i>Too little detail:</i> The majority of information has been deferred to an SPD which is inappropriate. Clarity needed on how this would be addressed on a locational basis, for example 'may be appropriate' or 'at other locations' is not clear guidance. On the converse, in areas outside the specific locations, requirements should not be put into place to stifle development. 	<p>Ref 8, 20, 21, 31, 34, 43, 69, 75, 87, 92, 95, 96, 106, 112, 114, 131, 144, 160, 179, 202, 216, 217, 219, 232, 243a, 243b, 244, 245, 250, 255, 264, 265, 267, 273, 277, 282, 298, 301, 303, 304, 307, 309, 311, 312, 316, 339, 341, 344, 350, 354, 355, 360, 361, 362, 363, 364, 365, 366, 372, 374, 377, 378, 380, 381, 382, 383, 385, 386, 387, 388, 389, 393, 395, 396, 403, 411, 412, 413, 419, 436, 437</p>
<p>For those respondents who made general comments on the location of tall buildings, these included</p> <ul style="list-style-type: none"> • The plan should include specific locations appropriate for tall buildings. 	<p>Ref 8, 18, 31, 288, 298, 311, 312, 316, 355, 380, 381, 382,</p>

Key Themes	Theme References
<ul style="list-style-type: none"> • These should focus on residential development at centrally located and accessible locations (such as Temple Meads). The proposal should benefit from greater clarity that the proposal is not restricted to the City Centre. • Around taller buildings, where these already exist in highly dense City Centre locations. 	383, 385, 386, 387, 388, 411, 413
<p>Other considerations included:</p> <ul style="list-style-type: none"> • Design: Underground spaces should be considered as well as tall buildings, and this should consider good quality signage and user-end experience of the public environment. • Objections were also raised in respect of tall buildings at the Western Harbour, Redcliffe Quarter and across other locations (Bedminster Green) (which are referenced within specific policies CDS1-CDS13) • TEQZ (which should consider Silverthorne Lane). 	Ref 18, 89, 95, 130, 147, 252, 264, 267, 298, 316, 354, 389, 414

Comments from statutory bodies and partnerships:

[Table 49 Comments from statutory bodies and partnerships](#)

Consultee	Reference
<p>Historic England are generally supportive of the principle, stating that in the right place, well-designed tall buildings can make a positive contribution to urban life and some of the best post-war examples of tall buildings are now listed. Historic England are supportive of para 4.2.9 which sets out that the City's heritage assets are conserved as the skyline grows and evolves.</p>	Ref 246

27. ULH5: Fire Safety

A total of 19 respondents considered proposal ULH5 of the concept of fire safety in their responses. A total of 11 responses were in support, 6 responses objected and 2 comments were neither in support nor objection.

Key themes that emerged from the responses:

Table 50 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>Support: The majority of those who responded to this proposal were in support. References to Grenfell Tower were made, and the need for appropriate fire mitigation to be made.</p> <p>Objects where based on two streams of thinking:</p> <ul style="list-style-type: none"> • <i>Fire Safety and Tall buildings</i>: Given the promotion of several challenges in high risks that are not found in traditional buildings, tall buildings have challenges associated with greater difficulties for fire-fighters, longer egress times and distances, alongside complex evacuation strategies. Careful consideration needs to be made in design purposes – so that accessible environments are created and people are clear of emergency protocol. • <i>Not a Planning Matter</i>: A number of responses considered that this was not a planning matter but was indeed a Building Regulations concern. This should be the subject of an independent review – given there is a danger that the proposal may be inconsistent with recommendations of the Independent Review of Fire Safety and Building Regulations. Conflicts with Written Ministerial Statement of 25 March 15 which restricts council from establishing standards relating to construction, performance and internal layout of new dwellings. 	<p>Ref 96, 250, 265, 267, 298, 299, 301, 317, 360, 361, 362, 363, 364, 374, 377, 395, 414, 445</p>

28. Student Accommodation: General

There were a number of general comments that were made about the intensification of students within Bristol. Of a total of 16 general responses, 6 were considered to be in support, with the remainder considered to be in objection or were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 51 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<ul style="list-style-type: none"> • Impact of Student Accommodation: Welcomed the raising of issues for student accommodation on communities (particularly with regards to noise, rubbish, policing, loss of housing and car-parking), particularly given there is no council tax receipts from their presence. • Intensification of Students: Students have reached their peak in Bristol and the adverse impact of students on local residents is significant. This will continue to get worse as the cap on student places has been lifted. There is no mention of the intensification of students and the implications of this on local infrastructure, and a local cap should be considered (say, 60%). • Engagement regarding growth: There has been limited engagement from UoB regarding their plans for growth. • Addressing Impact: Generally, proposal should address existing impacts of previous growth as well as future growth impacts. The proposal lacks practical implications for addressing issues of students and unsustainable university growth. • SPD: An SPD should be produced which covers additional detail. 	Ref 96, 104, 123, 145, 179, 240, 255, 273, 289, 317, 320, 329, 358, 367, 383, 389

29. ULH6: Specialist Student Accommodation

Of a total of 39 respondents which considered Proposal ULH6 explicitly, a total of 30 objected to the proposal, 4 supported and 5 were comments neither in support nor objection.

Key themes that emerged from the responses:

Table 52 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>Matching student numbers to provision</p> <p>Objections to this part of the proposal were based on the following elements:</p> <ul style="list-style-type: none"> • <i>Increase in Student Numbers:</i> A large number of respondents considered that any increase in student number should be restricted, not matched by further provision. A number of respondents considered that the increase in students should be restricted as the increase is not sustainable. • <i>Increase in accommodation should not be linear against number of students:</i> The increase in accommodation should not be provided on a one additional bed space to one additional student. Matching provision could place pressure elsewhere (for example in South Gloucestershire). • <i>Lacks precision:</i> A smaller number of respondents considered that the statement lacked purpose, and that the statement should be replaced with "Any expansion of university facilities that will generate an identifiable step change in student numbers will be expected to identify sufficient, appropriately located purpose-built student accommodation to accommodate the increase". • <i>Address existing need and shortfall:</i> New purpose built student accommodation should not be built just to accommodate an increase in student numbers but to reduce existing reliance on HMOs. There is no reference to the existing shortfall of high quality purpose-built student accommodation, despite student population growing by 9%. 	<p>Ref 114, 130, 228, 240, 264, 267, 271, 272, 273, 275, 288, 289, 301, 311, 316, 320, 354, 355, 369, 378, 383, 396, 402, 404, 411, 412, 428, 431</p>
<p>Specialist Locations</p> <ul style="list-style-type: none"> • Potential Sites for student accommodation: Disagree that the proposal should split-up potential sites for student accommodation and provision elsewhere. This is very restrictive and potentially constrains the development of equally appropriate sites outside of the preferred areas listed. Consider that the defined areas should be removed from the final proposal, and sites should be appraised on a 'site-by-site basis'. The split was also considered to be confusing by a number of respondents. <p>Locations:</p> <ul style="list-style-type: none"> • <i>Dispersal:</i> A small number of responses considered the integration of the University within the City should not be undermined by creating overly concentrated areas of students. Concentrations of student accommodation do not lend themselves to creating year-round communities. • <i>University of Bristol city centre precincts:</i> <i>Support:</i> Support stated that the proposal needs to be flexible enough so that alternative off-campus provision can meet demand if needed. • <i>Object:</i> Key concerns included: <ul style="list-style-type: none"> ○ There is too heavy a concentration of students within the City Centre. A balanced day and evening economy must include a mix of groups. Any additional provision would contribute to a higher concentration of HMOs and a bigger concentration of student accommodation to be unsustainable in terms of residential 	<p>Ref 264, 271, 273, 275, 289, 290, 298, 301, 316, 354, 355, 358, 383, 402, 404, 411, 412</p>

Key Themes	Theme References
<p>amenity.</p> <ul style="list-style-type: none"> ○ There is no such area termed the 'Clifton Campus' - these comprise three separate and distinct halls of residence and some smaller 'hall' type accommodation. ○ Inappropriate provision in this area given its conservation area status. Clarity also needed regarding the land and buildings which is not owned by UoB (such as the Highbury Villas and the Tyndalls Park Mews). <ul style="list-style-type: none"> ● <i>Stoke Bishop</i>: Objections to the expansion of halls in Stoke Bishop as this will continue to put huge pressure on car-parking associated with students and impact the Downs Conservation Area. ● <i>Kensington Low Road</i>: Objections considered there are an unacceptably high number of student HMOs at this location. ● <i>Highbury and St Michael's Hill</i>: Objectors considered that the 70%+ student population have an impact on the resident population. Notable that student houses and flats are only occupied for around 40% of the year - which is appalling given the need for housing. ● <i>Temple Meads Campus provision</i>: Concern, all students at the campus should be in purpose built accommodation and not reliant on HMOs for shortfall. ● <i>Locations Determined in Neighbourhood Development Plans</i>: This could result in no other locations being identified or only unsustainable locations. Suggest this is removed and replaced with: "in other locations that would not result in an overconcentration of purpose built student accommodation within that area." ● <i>Additional Flexibility</i>: <ul style="list-style-type: none"> ○ Draft proposal is too site specific and does not offer enough flexibility. This fails to recognise that a wide-range of educational establishments generate need for specialist accommodation. There should not be one approach for defined locations, and another approach for areas outside these. ○ Proposal could also restrict student accommodation in more peripheral locations, failing to recognise that some students may not wish to be close to campus and the potential positive impact this development could have on improving the vibrancy of local centres. ○ Proposal should change from effectively seeking to restrict purpose-built managed student accommodation to one which seeks to use a criteria based approach to ensure managed student accommodation can be acceptable in appropriate locations. ● <i>Lack of Clarity</i>: There is no reference to UWE students within Bristol City Council. This proposal represents a fair change from DM2, which promoted the City as a location for student housing, along with other locations that are close to universities or colleges – it is not clear of the justification for change? 	<p>Ref 145, 240, 266, 320, 358</p> <p>Ref 228</p>
<p>Affordable Student Housing</p> <ul style="list-style-type: none"> ● <i>Definition</i>: This definition is unclear. Affordable Student Housing needs to be defined and mandated to include for students from all economic backgrounds rather than HMOs in residential area, where population is already a problem. ● <i>Evidence for inclusion of Affordable Student Housing</i>: Suggest removal of 	<p>Ref 228, 264, 271, 275, 329, 354, 355, 358, 394, 402, 412</p>

Key Themes	Theme References
<p>requirement for affordable student housing. Fails to accord with paragraph 65(b) of the NPPF, which states that student housing development should be exempt from affordable housing obligations. Lack of clarity or evidence of 'identified need', especially when student rents are compared to other core (or neighbouring) cities.</p> <ul style="list-style-type: none"> • <i>Provide greater mix</i>: Solution is not to provide 'affordable student housing', but to provide accommodation that caters for the needs and mix of students. 	
<p>A larger number of references commented against the proposed criteria within the proposal.</p>	<p>Ref 262, 264, 288, 289, 301, 311, 316, 354, 355, 378, 383, 396, 402, 412, 416</p>
<p>Criteria 1: General Purpose Affordable Housing: Comments were generally objecting to the overall content of this proposal. Owing to paragraph 204 of the NPPF, it was considered to be unreasonable to require general contributions for affordable housing. National policy also requires that student housing should be exempt from affordable housing obligations, and it was unclear how this would be implemented (i.e. a 35% affordable housing requirement cannot be applied to student units in the same way as standard housing). There were also concerns about how affordable housing could be realistically delivered within the same sites as student housing.</p> <p>Those in support considered that there was no evidence to suggest that student housing should be exempt from affordable housing obligations. Support considered that Student Accommodation providers should be treated in the same way as any other developer.</p>	<p>Ref 264, 265, 275, 298, 311, 350, 354, 355, 358, 394, 402, 412</p>
<p>Criteria 2 Harmful Impacts: Clarity is needed on the meaning of 'undesirable concentration' and 'harmful impacts'. Opposition considered that the proposal should be redrafted to state that the developer/operator will engage with the LPA and agree procedures to be in place to, as far as possible, avoid adverse effects and that these will be balanced against positive benefits of the scheme when making a decision, as per NPPF.</p>	<p>Ref 264, 275, 354, 355, 402</p>
<p>Criteria 3 Mix of uses and Large Scale proposals: There was general objection to this part of the proposal on the basis that this would not support greater quality of life. One respondent considered that the proportion should be reduced to 20%.</p> <p>Clarity is needed on what is meant by 'substantial proportion'. Greater evidence of 'viability testing' is necessary – and there is concern that the proposal makes purpose-built private sector student accommodation unviable. There was concern that this would place increasing pressure on non-student housing stock (HMOs). Respondents considered that there is no national requirement for this proposal.</p>	
<p>Criteria 4 Active Frontages: There was predominantly support for Criteria 4, including support for the inclusion of active frontages. However, this should only be wherever possible and appropriate. This proposal should also be informed by viability testing where appropriate.</p>	

Key Themes	Theme References
<p>Impact Assessment: It was not considered to be clear what the trigger for the impact assessment was likely to be.</p> <ul style="list-style-type: none"> Objectors considered that data on supply and demand of student accommodation is already closely monitored and is provided in support of more significant planning applications. Subsequently, need for impact assessment is not necessary or valid. Viability: 'subject to viability' prefix should be added to any future proposal that requires student housing. This would drive down viability for SME developers and decrease choice for those seeking accommodation. 	
<p>Car Parking: A number of respondents cited that parking was one of the main concerns related to student accommodation.</p>	Ref 145, 240, 264, 266, 301, 311, 316, 320

Comments from statutory bodies and partnerships:

[Table 53 Comments from statutory bodies and partnerships](#)

Consultee	References
<p>South Gloucestershire Council considered that matching future increases in student numbers within additional provision of student accommodation could place additional pressure in the neighbouring areas of South Gloucestershire, unless a complementary and consistent approach is adopted through the new Local Plan. This would require on-going discussions with South Gloucestershire.</p>	Ref 428

30. ULH7 Houses in Multiple Occupation

Overall: Of a total of 35 respondents, 15 were considered to be in support of the proposal approach, 4 were considered to be in objection to the proposal and 16 respondents made comments neither in support nor objection (requiring additional clarity on specific terms used within the proposal).

Key themes that emerged from the responses:

Table 54 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>There was general support for restricting the number of Houses of Multiple Occupation within an area, with a number of respondents considering that current restrictions have not been sufficient and have resulted in areas of harm. Key comments considered the following:</p> <ul style="list-style-type: none"> • <i>Clarity of Harmful impact and Harmful Concentration:</i> Suggest there is an addition for ‘preventing harmful residential amenity or character’ or ‘harmful concentration of uses’. Greater evidence needed within these documents to justify ‘Harmful impact and Harmful Concentration’. • <i>Proportion of HMOS</i> <ul style="list-style-type: none"> • <i>Clarity:</i> How is the proportion of HMOs defined within a “given area” defined, and how will “housing stock” be defined? There was an argument for these policies focusing on Lower Super Output Area. • Greater clarity is needed for those <i>areas which already exceed the 10% guidelines</i>, and the proposal needs to set out how the Local Plan will achieve balance here. Further justification of the 10% threshold will be needed. Highbury area was identified as a particular location where there was not a ‘mixed and balanced community’, and one respondent queried how existing damage would be rectified. Greater clarity needed about how this could be defined. • <i>Sandwich Effect:</i> The unintentional impacts of this proposal need to be considered, however these were not defined. • <i>Proximity to Purpose Built Student Accommodation:</i> One respondent considered that there was a need to request a radius measure between existing and proposed HMOs, and proximity to PBSA. PBSA should be calculated as 1 unit per six bedspaces in order to be included in HMO proximity calculations. • <i>Article 4 Direction:</i> There was support for an Article 4 direction which covered the following: <ul style="list-style-type: none"> • <i>Article 4 should resist the conversion of commercial premises to student accommodation.</i> A number of respondents objected to BCS8 and DM12 had a previous role in protecting valuable local businesses from student accommodation. Consider extending Article 4 to include outer estates of the City Centre. These areas are seeing a significant level of Buy-to-Let conversion of former Local Authority stock. • One respondent considered that there was a need for further consultation on the possibility of an Article 4 Direction. • <i>SPD:</i> A Supplementary Planning Document needs to be developed, for which (a number of respondents considered should focus around the Clifton Down, St Georges, Hotwells and Avonmouth area). Pointed out an appeal case APP/Z0116/W/16/3158809 where an Inspector said, in absence of adopted SPD, he had no evidence to dismiss the appeal. 	<p>Ref 9, 52, 104, 114, 172, 243b, 264, 274, 289, 290, 317, 335, 354, 355, 358, 369, 383, 402, 425, 428</p> <p>Ref 29, 104, 172, 177, 228, 262, 264, 267, 271, 275, 279, 288, 289, 317, 329, 358, 369, 378, 383, 402, 404</p> <p>Article 4: Ref 29, 52, 264, 275, 310, 358, 369, 383, 407</p> <p>BCS: Ref 228, 275, 279, 329, 358, 383, 402</p> <p>DM12: Ref 172, 228, 262, 267, 275, 279, 285, 317, 329, 358, 369, 383, 402</p>

Key Themes	Theme References
<ul style="list-style-type: none"> • <i>Enforceable</i>: Proposal ULH7 needs to ensure that it is enforceable. • <i>Size</i>: All HMOs should be captured within this proposal, as opposed to just the larger developments. One respondent considered that the proposal should include a lower threshold of 4 units. • One respondent <i>objected to the removal of DM2</i>, unless this was considered for incorporation within a different proposal. There has been no consideration of character, or small-unit HMOs. <p>Those who objected considered that there was value in HMOs, particularly in providing accommodation for young people starting their careers. Others considered that this proposal would just restrict accommodation and result in additional purpose built student accommodation, or in combination with ULH6, an overall lack of supply.</p>	

Comments from statutory bodies and partnerships:

[Table 55 Comments from statutory bodies and partnerships](#)

Consultee	Reference
<p>South Gloucestershire Council considered that placing restrictions on House of Multiple Occupation could place additional pressure in the neighbouring areas of South Gloucestershire, unless a complementary and consistent approach is adopted through the new Local Plan. This would require on-going discussions with South Gloucestershire Council.</p>	Ref 428

31. ULH8 Older People's Housing

A total of 19 respondents considered Proposal ULH8. A total of 11 responses were in support, 1 response objected and 7 were comments neither in support nor objection.

Key themes that emerged from the responses:

[Table 56 Summary of consultation responses to elements of the Proposal](#)

Key Themes	Theme References
<p>There was general support for the proposal aims of ULH8. Whilst respondents were generally supportive, groups considered that careful consideration was needed about where sites should be allocated, suggesting these needed to be near where older people wanted to live.</p> <p>Key concerns covered:</p> <ul style="list-style-type: none"> • <i>Viability</i>: Need to consider the viability of C2 Extra Care Housing as an additional requirement. There are new definitions emerging in the NPPF and NPPG in terms of affordable housing – the implications of these definitions on Older People's housing and viability need to be considered too. A scheme providing older people housing should have the affordable housing requirement reduced. • <i>Alternative Forms of Development and Care Types</i>: Suggest alternative forms of housing delivery, such as community-housing, could represent an opportunity to deliver older people's housing. It is critical that there is flexibility within any proposal wording and that it does not restrict proposals for new models of care. • <i>Allocate Sites</i>: Need to ensure that sufficient sites are allocated to meet the needs of older people and importantly the locations where they 	Ref 29, 125, 174 248, 250, 251, 253, 265, 267, 273, 287, 298, 301, 354, 400, 414, 417, 425, 443

Key Themes	Theme References
<p>want to live. Older people housing is a diverse sector so plan should ensure sites available for wide range of development across a wide choice of locations, which need to be linked to nearby infrastructure.</p> <ul style="list-style-type: none"> • <i>Requirement on Larger Sites:</i> Query evidence on the requirement for Older People’s Homes to be delivered as a requirement on market sites and considered this to be too prescriptive in light of other proposal requirements. If this is the case, question why Proposal DM2 has been removed. Will ‘non-specialist homes’ be required alongside affordable housing? • <i>Definition:</i> Proposal needs to clearly define what constitutes older persons accommodation C2 Use Class (usually on-site, specialist care) from C3 use class (non-integral care provision) and should seek affordable housing delivery from only C3 developments with a preference for on-site delivery. It is not appropriate to seek affordable housing contribution from C2 older peoples housing. • <i>Separation of Older People Housing and Accessible Housing Policies:</i> Query how this will be different from accessible housing? 	

32. ULH9 Accessible Homes

A total of 27 respondents considered Proposal ULH8, of which a total of 14 were in support and 13 objected.

Key themes that emerged from the responses

Table 57 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>There was general support for this proposal goal, which will create choice in the general housing market. Key comments include</p> <ul style="list-style-type: none"> • <i>Clarification:</i> There is a need for clarification of the definition of ‘larger schemes’. • <i>Relating proposal approach to demands for accessibility:</i> Suggest that there is a 10% requirement for new homes to be wheelchair accessible and flexibly applied on an individual site basis. Suggest also that accessible housing is located on the most accessible part of any site (being mindful of topography in Bristol). Consider commuted sum where this is not deliverable. • <i>Alternative models of Housing Delivery:</i> Considered that alternative models of delivery (i.e. community housing) can achieve. There should also be some measures to encourage self-builders and smaller developments to include accessibility in their designs as the current proposal structure forces disabled and elderly people to move to larger scale new developments. • <i>Evidence required:</i> Written Ministerial Statement (March 2015) and PPG state that LPAs must support any higher accessibility, adaptability and wheelchair housing standards with a clear evidence base and housing needs assessment. Proposal ULH9 as worded is not robust, not supported by evidence base and does not reflect national planning guidance. No reason to exceed Building Regulation standards. • <i>Viability:</i> The viability of this proposal has not been tested. • <i>Separation of Older People Housing and Accessible Housing:</i> The 	<p>Ref 31, 174, 243b, 249, 250, 265, 267, 287, 298, 299, 301, 303, 309, 354, 360, 369, 371, 372, 377, 384, 407, 413, 414, 419, 425, 427</p>

Key Themes	Theme References
<p>separation of older people's housing and accessible housing also seems to be an unnecessary complication in considering specialist housing.</p> <ul style="list-style-type: none"> • <i>Consider Standard:</i> There are significant differences between M4(2) and M4(3) so the proportional requirement for wheelchair accessibility/adaptability. There is a significant case for all homes to be built to the Lifetime Homes Standard (M4(2)) and 10% of homes to be built to M4(3) standards in larger schemes. As a minimum the requirement should be for 20% on larger development to be wheelchair adaptable. 	

33. ULH10 Self-Build Accommodation

A total of 50 respondents responded to Proposal ULH10; 44 were generally in support in principle of expanding self-build (subject to the definition being expanded or other qualifications) with only two people objecting and 4 making comments neither in support nor objection.

Key themes that emerged from the responses:

Table 58 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>There is general support for Self-build accommodation and proposal ULH10, with respondents considering that this represented an alternative source of providing housing within the City. Whilst people were generally in support, key comments requested additional clarity or extension of the definition to include broader mechanisms for delivery:</p> <ul style="list-style-type: none"> • <i>Definition:</i> There is a need of a definition of self-build and custom build. • <i>Strong emphasis on broader definition to include Community-Led Housing:</i> Consider a proposal which focusses on Community Led Housing and the allocation of sites specifically for this purpose, as this would enable a critical mass of self-building to take place. Self-build promotes a small number of individual plots, which does not build community. Need community-led schemes, self-build, custom build homes, community-led and eco-self-build communities. • <i>Need for SPD on Self-Build:</i> Respondents suggested the idea of a need for a Self-build or Community Led Housing SPD which could offer greater certainty and clarity of what is appropriate (for example, consider 'pass-porting' as a means to ensure consistent and appropriate design standards). • <i>Offer Clarity and Certainty in Proposal Implementation:</i> A number of responses considered that there was a need to refine the process for community-led and self-build applications: <ul style="list-style-type: none"> ○ a. Fast-track community-led developments with dedicated BCC support. ○ b. Allow for greater design flexibility in self-build homes. ○ c. Allow for more flexible space standards, permitting to include community spaces in the calculation. ○ d. Provide encouragement and support to planning officers to use their discretion to support community-led development. • <i>Proposal flexibility:</i> There is a need for proposal flexibility to cover all types of self-build/community-led. Consider an 'exception proposal' (for surplus open land within the urban area). • <i>Target:</i> There were conflicting views, which stated <ul style="list-style-type: none"> ○ Should include a target for housing delivery through self-building (suggest 20%) which would enable the Council to stimulate demand and delivery. ○ Others considered that this should not be a blanket target. • <i>Maintain Self-build Register and Self-Build Proposal Support:</i> There is a need for a self-build register to be retained across the Council, and greater emphasis needs to be placed on publicising what land is available. • <i>Inclusion on larger sites vs specific self-build sites:</i> Further consideration is needed about the interaction of self-build allocations as part of larger sites. For example, should some sites be set aside for entirely community-led forms of development and how would this intersect with tall 	<p>Ref 5, 29, 31, 94, 117, 122, 174, 180, 203, 226, 227, 231, 239, 249, 250, 251, 260, 265, 267, 273, 282, 301, 303, 317, 318, 338, 352, 353, 359, 360, 361, 362, 363, 364, 366, 371, 372, 374, 375, 377, 384, 400, 407, 419, 420, 425, 427, 430, 438</p>

Key Themes	Theme References
<p>buildings/urban living? There are practical issues of delivering self-build on larger sites:</p> <ul style="list-style-type: none"> ○ Consider that self-builds would need their own access on larger sites. ○ Consider that there should not be a reliance on self-build land, coming forward as part of large developments. Other mechanisms for identifying land should be considered (references PPG) – use of their own land through land disposal. ○ Question whether self-builders want to be part of larger sites? ○ Consider off-site contribution where self-build cannot be delivered on site. <ul style="list-style-type: none"> ● <i>Interaction with other proposal requirements:</i> <ul style="list-style-type: none"> ○ <i>CIL and Affordable Housing:</i> There is a need to understand the proposal requirements for CIL liability and Affordable Housing in relation to Self-Build Housing. Possibly consider a mechanism for restricting land use to affordable community housing or remove completely. ○ <i>Space Standards:</i> Self-builds may not meet National Space Standards, often due to higher levels of communal space. ○ <i>Tall Buildings/Urban Living:</i> How will Self-build interact with Urban Living and Tall-building initiatives? Community Land Housing can play a role in addressing densification of historic low-density estates. ○ <i>Mixed Use:</i> Not appropriate to consider self-build on mixed-use sites. ● <i>Evidence:</i> There is a lack of evidence for this level of self-build accommodation, and a lack of viability assessment for this proposal. Self-build register cannot be the only source of evidence. ● <i>Site Allocations:</i> Where would these be located? Responses considered that site allocations should be for community land housing and should be as follows: ideally for developments of 20 to 100 homes; in locations for the wider community benefits self-build; to ensure their viability, in locations where people interested in the community proposition would like to live and promote medium- to high-density self-build community developments (50 to 80 homes per hectare). ● <i>Recommended Amendments:</i> ‘Allocation of housing sites to provide self-build/self-finish plots is proposed. A proportion of self-build plots will be sought through residential developments that include a proportion of houses; the provision of self-build plots is to be discussed on a case by case basis and dictated by site specific circumstances’. 	

34. Economy and Employment Land

Overview: In total, 7 respondents made comments with regard to the Economy and Employment Land section.

Key themes that emerged from the responses:

Table 59 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>Principle: Wide ranging comments were received on the general approach to the economy and employment land in the plan. Of those expressing support for the approach, one respondent specified particular support for the reference to promoting start-ups, small/micro businesses and social enterprises. Another highlighted the need for proposal to be flexible enough to prevent barriers to the economy in the future.</p> <p>Of those objecting to the approach, comments were concerned that it is not ambitious enough and does not sufficiently balance employment land need against housing need, with potential under-allocation in the plan for employment land. The lack of suitable office space in the city and allocation for it in the plan was cited as a potential barrier to future investment opportunities, while another comment expressed concern about the use of the phrase 'consolidate' in the document which does not demonstrate pro-growth. An explicit reference to growth plans was suggested.</p> <p>Several general comments and recommendations were made, including:</p> <ul style="list-style-type: none"> • Suggest local labour agreement proposal for major developments. • More detailed guidance and proposal needed on balance of uses and tipping points. • More detail needed with regard to retail industry. • Employment uses should be encouraged along key transport routes like Whiteladies Road and Severn Beach line. • Proposal needs to address flaws in the JSP Economic Development Needs Assessment. • Proposal should reference education as a major employment source. 	Ref 243b, 309, 313, 343, 369, 415

Comments from statutory bodies and partnerships:

Table 60 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Historic England considered that there is an absence of reference to the visitor/tourism economy even though it is currently 9% of the GDP. Heritage contributes significantly to tourism. Realising the potential will be dependent on a constructive and supportive approach to future planning that protects and enhances the quality of the City Centre.</p>	Ref 246

35. EC1: Avonmouth Industrial Area

Overview: In total, 12 respondents made comments with regard to EC1: Avonmouth Industrial Area. Key themes that emerged from the responses:

Table 61 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>Principle: Public comments received were generally supportive of the proposal approach, although one respondent questioned if there should be a reference to 'deep port' activities at Avonmouth. Comments from statutory consultees raised more objections to the principle of the proposal and are detailed below.</p>	Ref 267, 285, 401
<p>Bristol Port Company consider that the Local Plan Review contains limited reference of Avonmouth Port and its importance/strategic role. This renders Local Plan deficient as it does not coherently consider role and significance of Port and does not set out any specific policies. This is not in conformity with National Policy Statement for Ports. Demonstrates lack of clear understanding of Port's activities and characteristics (distinct from general industrial areas) and does not address role of Port as nationally significant infrastructure asset. Also a significant shift from Core Strategy which recognises importance of Port in proposal BCS4 and encouraged port-related activities.</p>	Ref 326
<p>Hallen Marsh habitat mitigation: All three comments received were supportive of the proposal with regard to Hallen Marsh. It was suggested that there should be public access provided to the site for the enjoyment of wildlife.</p>	Ref 253, 310, 349
<p>Site Specific: Comments were received relating to the following sites:</p> <ul style="list-style-type: none"> Greenfield land at Access 18 suggested as a potential mixed commercial and industrial use site. Expansion of St. Mowden/Access 18: concerns raised over transport and access to the site if developed for more warehousing. A need for improved transport links to support development of the site. 	Ref 294, 310

Comments from statutory bodies and partnerships:

Table 62 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Historic England states that there is no reference to the importance of the preserved archaeology within the low-lying Avonmouth levels and in particular the complex Bronze Age landscape.</p>	Ref 246
<p>South Gloucestershire Council considers that there is a need for on-going joint working in relation to Avonmouth Severnside, particularly regarding the development of site-specific allocations and ecological mitigation measures.</p>	Ref 428
<p>Environment Agency: There are a number of industrial activities regulated by the Environment Agency. These have the potential to cause noise, dust, odour and pollution, which could have adverse impact on the new forms of business space provided. The Agency would seek reassurances that Local Plan policies BCS23, DM33 and DM35 will continue to safeguard the on-going viability of these industries, which may be vulnerable to noise sensitive developments.</p> <p>The Avonmouth Severnside Strategic Flood Risk Assessment (SFRA) Level 2 should be updated with recent tidal inundation modelling outputs.</p>	Ref 405

Consultee	Reference
Highways England: The implications for M5 and particularly M5 J18 of this proposal should be considered, taking account of the new junction on the M49.	Ref 336

36. EC2: Industry and Distribution Areas

Overview: In total, 21 respondents made comments with regard to EC2: Industry and Distribution Areas.

Key themes that emerged from the responses:

Table 63 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>Principle: Of those supporting EC2, comments noted that the proposal would give protection to employment uses while allowing redevelopment for surplus land. Some respondents would like the criteria to establish the land as 'surplus' to be clear in the proposal. Some respondents felt that ensuring flexibility of the proposal is crucial as many of the protected sites may have opportunities for mixed-use schemes that align with the principles of urban living.</p> <p>Several respondents put forward suggestions for the proposal, including:</p> <ul style="list-style-type: none"> • Proposal could include relocation of existing industrial uses to edge of city and main transport route locations to enable redevelopment of brownfield land as per urban living. • Proposal should take account of evidence documents such as the Urban Potential Assessment. • Proposal should align with Old Market Neighbourhood Development Plan. <p>One respondent was concerned that the proposal approach favours hi-tech industries over the low-tech manufacturing sector, which will still be needed in the city. One objector raised concern that the proposal does not sufficiently demonstrate how industrial growth will be achieved, stating that the industrial areas need safeguarding and investment to meet future needs.</p>	Ref 75, 267, 287, 325, 343, 350, 380, 381, 382, 385, 386, 387, 411, 413, 415
<p>Specific Sites: Some respondents objected to the list of sites identified as Industrial and Distribution areas. The following sites were named by respondents as fully or partially inappropriate for protection under EC2:</p> <p>20. Netham Road/Blackswarth Road. 14. Fishponds Trading Estate. 15. Hawkfield Business Park. 21. New Gatton Road.</p> <p>One respondent supported the non-inclusion of a site previously considered a PIWA, Land west of Pennywell Road.</p> <p>One respondent stated that Brabazon Hanger should be removed from PIWA status.</p>	Ref 21, 29, 249, 325, 382, 388, 401, 411
<p>Other Matters Raised: The following issues were also raised by respondents:</p> <p>Article 4 directions:</p> <ul style="list-style-type: none"> • The need for Article 4 directions to protect key office sites from redevelopment through prior approval process, such as Parkview Campus. 	Ref 31, 75, 287

Key Themes	Theme References
<ul style="list-style-type: none"> Creative spaces: the need to support artists and creative spaces such as BV Studios Spike Island and Brunswick Club Studios. 	

37. EC3: New Forms of Work Space

Overview: In total, 11 respondents made comments with regard to EC3: New Forms of Work Space.

Key themes that emerged from the responses:

Table 64 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>Principle: The comments expressed general support for the principle of the proposal, and its potential to support varied businesses such as start-ups, social enterprises and micro-businesses. It was also recognised by some respondents as providing a sustainable employment location at potentially higher densities than existing.</p> <p>However some respondents consider that it is not appropriate to require all development of former industrial/distribution land to provide new forms of workspace and this should be applied with regard to market demand. Flexibility in the approach was considered important by some respondents, as well as the need to keep some available land for future growth.</p> <p>Other suggestions made by respondents included provision for the sustainability industry and provision for studio, hobby and workshop space especially in high density areas.</p>	Ref 267, 273, 311, 353, 360, 407, 413, 415, 418, 419, 425

38. EC4: Digital Connectivity

Overview: In total, 10 respondents made comments with regard to EC4: Digital Connectivity.

Key themes that emerged from the responses:

Table 65 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>Principle: The majority of comments received expressed support or strong support for the proposal. Four objection comments were received, which related to the imposition of standards through proposal which are higher than existing building regulations, which was considered to be contrary to the Written Ministerial Statement 2015.</p>	Ref 29, 250, 264, 267, 301, 302, 317, 366, 417, 427

39. Health and Wellbeing: HW1: Air Quality and HW2: Control of Polluting Development

Overview: In total, 81 respondents made comments with regard to Health and Wellbeing, including policies HW1 and HW2. Key themes that emerged from the responses:

Table 66 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
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Key Themes	Theme References
<p>General comments on Health and Wellbeing: Comments received expressed greater emphasis on the following aspects of health and wellbeing: green amenity spaces, nurturing nature, sustainable/active travel, child friendly spaces and play.</p>	Ref 76, 105, 209, 229, 253, 255, 273, 285, 306, 317, 337, 339, 340, 351, 392, 405, 406, 407, 425
<p>HW1 – Air Quality: Of those supportive of proposal HW1, respondents made comments relating to the need for a strong approach and a focus on complying with legal measures and taking preventative measures rather than relying on financial contributions. Examples provided by respondents include making a stronger commitment to traffic reduction and addressing car commuting, addressing wood burning stoves and design requirements to reduce air quality impacts.</p> <p>More detail on the financial contributions mechanism and the projects it would fund was requested by several respondents.</p> <p>Of the objecting respondents, concerns raised include the lack of viability testing and evidence to support the proposal, and the addition of potentially onerous requirements on developers which could impact delivery. Some comments queried how effective the proposal would be at addressing air quality issues, including the efficacy of off-site mitigation and whether the financial contributions mechanism will allow for high emitting developments to get permission through off-setting impacts financially.</p> <p>With regards to specific locations, comments referred to air quality issues at Avonmouth, Bedminster, the Western Harbour, Bath Road and the need for an additional Park and Ride in North Bristol.</p>	Ref 1,8, 11, 14, 16, 23, 33, 35, 48, 54, 55, 60, 64, 66, 69, 72, 73, 80, 86, 98, 102, 107, 108, 110, 113, 116, 119, 143, 146, 148, 156, 161, 170, 176, 188, 189, 192, 197, 214, 221, 223, 224, 233, 243b, 253, 255, 263, 272, 273, 274, 277, 290,295, 298, 301, 302, 307, 317, 346, 351, 353, 354, 355, 360,368, 378, 390, 397, 406, 407, 413, 416, 418, 425
<p>HW2 Control of Polluting Development: Comments received generally supported HW2, with one respondent suggesting it should be a stronger proposal to prevent any development which increases pollution. Another respondent requested more detail and suggested that off-site solutions may not help as pollution impacts are so localised. A suggestion for an AQIA to be required from multi-storey car park developers was made.</p>	Ref 151, 295, 369, 378

Comments from statutory bodies and partnerships:

[Table 67 Comments from statutory bodies and partnerships](#)

Consultee	Reference
<p>Bristol Avon Catchment Partnership recommend that any new proposal considers steps to reduce health inequalities in Bristol by ensuring that the wider determinants of health are addressed in an integrated and co-ordinated way. Development proposals should assess the potential impacts and opportunities on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Health Impact Assessments.</p>	Ref 2
<p>Historic England have noted that participating in heritage can contribute to people's personal development.</p>	Ref 246

<p>Wessex Water: emerging proposal should include some recognition that development by or for statutory undertakers would not be subject to additional contributions within or adjacent to AQMA. Development of infrastructure is necessary to meet aspirations of LP, concern that statutory undertakers such as Wessex Water would be double funding the CAZ requirements at development stage and for individual vehicles entering the CAZ.</p> <p>HW2 needs to be set in context with controls under the Environmental Permitting Regulations as amended with the requirements of the Medium Combustion Plant Directive and Government proposal on generator permitting.</p>	Ref 345
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40. New Protection for Open Space, HW3: Specially Protected Open Space and HW4: Reserved Open Space

Overview: In total, 51 respondents made comments with regard to New Protection for Open Space, including policies HW3 and HW4.

Key themes that emerged from the responses:

Table 68 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>Principle: Of those supportive of the principle of the proposal, several respondents made requests for greater clarity on which sites would be protected (and if this includes school fields) and how the assessment and re-designation of existing sites would occur.</p> <p>Some respondents suggested the proposal should also have strong references to protecting wildlife habitats and high quality soils for food growing. A comment regarding advertising in parks stated this is contrary to the aims of HW3 and HW4.</p> <p>A considerable number of respondents objected or raised concerns relating to these policies, which they believe would result in an overall reduction in green space and levels of protection. Some respondents felt the proposal approach is negative; concerned with protecting spaces from development rather than maximising and creating new green space. The request for local communities to nominate sites was criticised, with one respondent stating that this could disadvantage less wealthy and resourced areas to protect their spaces and others describing it as onerous.</p>	Ref 76, 105, 209, 229, 253, 255, 273, 285, 306, 317, 337, 339, 340, 351, 392, 405, 406, 407, 425
<p>Definition: Comments received generally expressed concern that the difference in definition between HW3 and HW4 and the protections they provide is not clear, nor is the mechanism in which they would be assessed and designated. One respondent stated that the designations should be used as widely as possible to prevent development of green space, while another suggested stronger wording to prevent development unless in exceptional circumstances.</p> <p>One comment stated that the relationship between the new designations and existing designations under policies DM16 and DM17 is not clear.</p>	Ref 30, 118, 234, 253, 255, 285, 287, 293, 301, 317, 321, 405, 417, 425, 426, 427

Key Themes	Theme References
Of those objecting to the proposal, the need for strong evidence and NPPF compliance with regard to the definitions was raised as a concern.	
<p>HW3: Specially Protected Local Green Space nominations: The following sites were nominated for inclusion as Specially Protected Local Green Space under HW3.</p> <ul style="list-style-type: none"> • Troopers Hill Local Nature Reserve. • Troopers Hill Woodland. • Troopers Hill Field. • St George's Park. • Dundridge Park. • East Bristol Allotments. • Ashley Street Park. • Coombe Brook Valley. • Mina Road Park. • Badock's Wood. • Stonebridge Park. • May Hassell Playing Fields. • Bedminster Down. • Land to the east of Wesley College. • Stoke Lodge. • The Slopes (The Bommie, Glyn Vale, Kingswear, Novers and the registered common of Novers Common). • Lamplighter's Marsh. • Hartcliffe, Withywood and Bishopsworth. • Manor Woods Quarries and Orchard. • North Bristol locations: Redland Green, Cotham Gardens, Redland Grove Open space, Montague Place triangle, Elm Lane amenity area, Thomas Memorial, St Andrews Park, Muller Road/Ashley Down Green, Queen Victoria House garden space, Somerset Street open space. 	Ref 10, 29, 38, 68, 84, 97, 141, 164, 173, 201, 256, 278, 287, 296, 308, 332, 375, 399, 392, 426, 435, 439, 444

Comments from statutory bodies and partnerships:

[Table 69 Comments from statutory bodies and partnerships](#)

Consultee	Reference
<p>Bristol Avon Catchment Partnership state that:</p> <ul style="list-style-type: none"> • It would be beneficial to clarify which forms of open space fall within the statistic for a fifth of the city's land area. The BACP would welcome a more ambitious open space provision than the proposed 20%. • Local Green Spaces should be identified based on the potential to 'allow for adaptation to climate change'. • It is not clear what criteria have been used to assess 'areas of land no longer required to be maintained as open space'. • It would also be useful to understand which published standards for green space provision would be used and if these will be applied in the areas where substantial new development is planned. • BACP would welcome an Open Space approach which recognises the increasing importance of greenspace distribution and quality to mitigate against the impacts of climate change at a local neighbourhood level. • BACP welcome an open space needs assessment which focusses on inequalities in greenspace distribution and quality. 	Ref 2

Consultee	Reference
<p>The Environment Agency consider that proposals for maintaining the current open space could be made more aspirational by setting a target to increase the quantum of open space rather than maintaining the status quo. Open Spaces can provide multiple benefits.</p> <p>Exclusion of Local Wildlife Sites, Sites of Nature Conservational Interest or the value of watercourses: Specially Protected Local Green Space cover Local Nature Reserves but does not appear to include Local Wildlife Sites/Sites of Nature Conservation Interest. Further consideration should therefore be given to this matter. There appears to be little reference to the value of watercourse and wetlands, and the Agency would advise that opportunities to provide enhancements should be carefully considered.</p>	Ref 405
<p>Wessex Water: A design-led approach suggested. Would welcome an open space proposal approach which recognises the increasing importance of greenspace and green infrastructure to mitigate against impacts of climate change at local neighbourhood level.</p> <ul style="list-style-type: none"> • 6.2.2: need to clarify which forms of open space are included in statement that a fifth of the city's land area is open space. Would welcome approach which is more ambitious than existing 20% open space provision e.g. London target of 50% by 2050, recognising that green liveable cities attract investment. • 6.2.2: Not clear what criteria will be used to assess if land is no longer required as open space. It would be useful to have this information available at the same time as LP review to understand how such areas will integrate with new policies for open space. • 6.2.3: introduction of new designations for open space from Important Open Space needs to be clearer as it could be perceived as reallocation of important open space into three different categories with different levels of protection from development (or potentially no protection). • 6.2.4: suggested amendments were included in the detailed response. <p>Criteria in which reserved open space is no longer required for its function is not clear. It would be useful to understand which published standards for green space provision would be used and if these will be applied in areas of substantial planned new development. Any loss should take into consideration potential loss of other functions including access, health and wellbeing, urban cooling, urban drainage or attenuation, biodiversity and related factors.</p>	Ref 345
<p>Sport England stated overall objection to the plan. They consider that that recreation and sport space including playing pitches are not adequately protected in plan. They made the following points:</p> <ul style="list-style-type: none"> • Plan should reference Active Design principles set out by Sport England and Public Health England. • Existing sports facilities (outdoor) should be protected in plan. • Plan should promote community use of education sites, so that school facilities can be used by general public to increase provision. 'Use Our School' resource of Sport England provides advice on this. 	Ref 342

41. HW5: Takeaways

Overview: In total, 14 respondents made comments with regard to HW5: Takeaways.

Key themes that emerged from the responses:

Table 70 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>Principle: Of those supporting the proposed approach, some respondents suggested there is justification to increase distance criteria further. One respondent would like an SPD to be produced to support the proposal.</p> <p>Of those objecting to the proposal, concerns related to the lack of evidence supporting the approach and the link between food, obesity and proximity. Some respondents felt the proposal is not sound. Further concern relates to the definition of takeaways as Use Class A5, as a wide range of establishments may be A5 Use Class and this may not capture unhealthy non-A5 uses. Potential harmful impact on town centre viability was also raised.</p> <p>Other comments broadly relating to HW5 suggested a new Use Class for independent takeaways (rather than multi-nationals/chains), the potential for a similar approach to alcohol near student accommodation and the need for a litter control plan around takeaways.</p>	<p>Ref 177, 203, 254, 287, 297, 317, 323, 353, 354, 370, 378, 416, 425, 427</p>

42. Climate Change: RES 1 – RES 4

Overview: In total, 74 respondents made comments with regard to the topic of Climate Change, including policies RES1, RES2, RES3 and RES4.

Key themes that emerged from the responses:

Table 71 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>Climate Change, general comments: Several comments expressed support for the commitment to climate change in the Local Plan. However, several comments stated a need for a stronger and more progressive approach which allows for innovative solutions. One respondent queried the term clean energy. Some suggestions for additional measures to be referenced in the proposal include a widespread education and awareness campaign; tree planting; Child Friendly City objectives; new solar, wind and tidal technologies; and a zero carbon footprint requirement for new council housing.</p>	<p>Ref 28, 218, 243b, 286, 306, 319, 353</p>
<p>RES1 Meeting more of development's energy needs sustainably: Of those in support of the proposal, some respondents stated a desire for it to apply to all new development and not just residential. Some also suggested that the proposal should be more supportive of renewable energy generation including wind, could reference Community Energy and could include additional measures such as offsetting transport emissions from development.</p> <p>Of those objecting to the proposal, the predominant concern raised was that the proposal has not been viability tested or sufficiently evidenced, failing to justify the approach or its deliverability. Subsequently, several respondents feel the proposal is unsound. They raised concerns that the proposal would not align with Part L of Building Regulations, introducing uncertainty for developers. Many objectors felt that the proposal would not be deliverable</p>	<p>Ref 28, 30, 78, 114, 117, 152, 180, 203, 226, 243b, 245, 249, 250, 251, 264, 265, 266, 267, 272, 287, 298, 299, 301, 302, 309, 311, 317, 319, 350, 353, 354, 355, 360, 361, 362, 363, 364, 366, 369, 371, 372, 374, 375, 377, 384, 397, 400, 406, 407, 413, 418, 419, 425</p>

Key Themes	Theme References
<p>and could stifle development, including certain necessary/useful buildings and the delivery of affordable housing. Many respondents advocated for a more flexible, 'fabric first' approach.</p> <p>With regard to financial contributions specifically, some respondents queried how the funds raised would be used and how it would be applied to developers. Some queried if this would be a sound and justifiable approach, and highlighted that if an on-site solution is not viable, an off-site contribution is also unlikely to be viable.</p>	
<p>Proposal RES 2 Updating the approach to heating systems: Responses to RES2 were generally supportive, subject to more detailed wording being provided. Some respondents referred to the need for the proposal to reference renewable sources and to take account of the right type of heating systems for developments. One respondent requested more certainty regarding waste heat from generators and Avonmouth plants to allow planning of heat networks.</p>	Ref 30, 265, 267, 299, 317, 319, 406, 407
<p>Proposal RES 3 Supporting new sustainable design standards: All comments received in relation to RES3 were supportive. Specific comments included:</p> <ul style="list-style-type: none"> • Building with Nature standards should also be referenced. • Opportunities to further raise standards should be regularly sought. • recycled content building products (RCCBPM) could be referenced. • eco self-build communities practice sustainable design. 	Ref 30, 57, 78, 117, 180, 203, 226, 255, 266, 267, 287, 337, 350, 351, 353, 356, 425
<p>Proposal RES 4 Stronger policies for adapting to climate change: Comments received were generally supportive, however made suggestions for more tree planting; to address adaptation of existing development; to have greater emphasis on SUDs and to identify renewable energy zones. Several respondents stated the need for more detail, and to be able to understand the impact of proposal on viability.</p>	Ref 28, 266, 301, 317, 351, 353, 354, 355, 369, 425
<p>BCS9 Green Infrastructure: Comments support retention but needs to increase protection of allotments and garden trees, reduce noise pollution, encourage green pathways and pedestrian routes. One respondent expressed a need for a Bristol Green Infrastructure Plan.</p>	Ref 75, 203, 213, 253, 267, 297, 337, 367, 370, 409
<p>Other matters raised: Additional comments concerned:</p> <ul style="list-style-type: none"> • BCS13: Object to loss of proposal which referenced need to encourage active travel to mitigate climate change. • Transport: the need for proposal to reference electric cars and charging points, emphasise active travel and encourage opening up of new rail stations and rail electrification. 	Ref 28, 253, 367

Comments from statutory bodies and partnerships:

Table 72 Comments from statutory bodies and partnerships

Consultee	Reference
<p>SSE Generation Development Ltd: <i>Climate Change:</i> Supports text in 7.01 in which the Plan sets principle that 'development should minimise energy demand and maximise the use of renewable energy, where viable meeting all demands for heat and power without increasing carbon emissions'.</p> <p>Support text of 7.1.6 that Local Plan Review presents opportunity to update and upgrade climate change and sustainability policies of the Local Plan to maintain Council's commitment to these issues.</p> <p><i>RES 1:</i> Proposal should be supportive of renewable energy including larger tip heights to reflect commercial viability. Proposal should consider applications for repowering of existing plant, wind farm extensions and remove time-limit conditions from planning permissions. There should be proposal support for new gas development.</p>	Ref 283
<p>South Gloucestershire Council: <i>RES 2:</i> support references to joint working on potential District Heating Systems at Avonmouth Severnside, and for a refocus on proposal locations where heat networks are either being planned or delivered.</p>	Ref 428
<p>Bristol Avon Catchment Partnership: <i>RES 3:</i> supports the inclusion of the text which states 'the council wishes to ensure that planning policies are sufficiently clear in securing adaptation measures from development'.</p> <p><i>RES4:</i> Bristol Avon Catchment Partnership supports the Proposal RES4, and specifically the recognition that adaptation to climate change lacks the prominence and detail of other areas of sustainable design proposal and the desire to have stronger policies for adapting to climate change'.</p> <p>BACP have suggested an update to Proposal BCS9 to include references to climate change.</p>	Ref 2
<p>Historic England: Energy Efficient Alterations: Important for the Local Plan to encourage only appropriate and suitable alterations to the city's heritage assets. Historic England has prepared considerable advice that should help to inform a suitable reference in the Plan.</p>	Ref 246
<p>Wessex Water: Supports in principle however need to address adaptations beyond site level, which recognises cross-boundary nature of some forms of green infrastructure. More proactive policies for adapting to climate change could be incorporated into other proposal areas particularly green infrastructure and open space. These could help ensure delivery of adaptation measures beyond development sites, especially as higher density development could mean less open space on site for adaptations to climate change.</p> <p>Existing proposal BCS9: suggested amendments set out in detailed response.</p>	Ref 345

43. Food Systems and RES5: Stapleton Allotments

Overview: In total, 22 respondents made comments with regard to the topic of Food Systems and RES5: Stapleton Allotments.

Key themes that emerged from the responses:

Table 73 Summary of consultation responses to elements of the Proposal

Key Themes	Theme References
<p>Updates to existing proposal: Respondents were generally supportive of the inclusion of food systems within the plan, however several felt that policies could and should be stronger and with greater emphasis throughout the plan and stricter enforcement. They stated that it should include greater protection of allotments, food growing sites and best and most versatile soil, and the St Philips Wholesale Market. Food growing could be a strategic objective of the plan and it could also commit to adoption of plans such as the December 2013 Good Food Plan and Milan Urban Food Policy Pact. Collaboration across the West of England region could take the form of a task force.</p>	Ref 209, 255, 261, 266, 297, 317, 353, 370, 416
<p>Pollinating Insects: While two respondents expressed support for the plan's reference to pollinating insects, one pointed out that BCC still uses pesticides and herbicides in urban areas.</p>	Ref 28, 349
<p>RES5: Stapleton Allotments: All comments received were in support or strong support of Proposal RES5, with several respondents stating that all allotments should receive similar protection. A map and outline of the allotments was requested to be included in the plan.</p>	Ref 30, 114, 152, 184, 203, 255, 267, 297, 351, 353, 370
<p>Other matters raised: Some comments related to additional, related topics:</p> <ul style="list-style-type: none"> • <i>Allotments:</i> One respondent stated that the ambition in the plan should be to increase allotment provision and not just protect existing sites. Two comments concerned the potential to increase allotments at Knowle West, and to protect allotments at Longfield Road/Upper Belmont and Sommerville Roads. • <i>Green Infrastructure:</i> A comment stated that policy DM31 should be included in the list of supporting policy (p63) and another expressed concern that the Green Infrastructure Strategy to accompany the JSP does not have sufficient funding or status. 	Ref 255, 285, 306, 351, 427

Comments from statutory bodies and partnerships:

Table 74 Comments from statutory bodies and partnerships

Consultee	Reference
<p>South Gloucestershire Council: Notwithstanding the value of the allotments, South Gloucestershire consider that it is fundamental to ensure the ability to provide a Park and Ride site adjacent to the M32 which can intercept trips on the Strategic Road Network. SGC consider that a change in designation is premature at this stage, given the importance of the Park and Ride as recognised within the Joint Transport Strategy. SGC are looking to work with BCC to find an alternative suitable location.</p>	Ref 428

44. RP1: Retained Policies

The following table lists comments made in reference to existing policies that are proposed to be retained or removed as part of the Local Plan Review:

Table 75 Summary of consultation responses to elements of the Policy

Policy	Object	Support	Comment	Summary	References
Policies to be Removed					
BCS1: South Bristol	1			Object as policy emphasises improvements to pedestrian, cycling and public transport facilities.	Ref 253
BCS2: Bristol City Centre	1			Object as policy references improvements to public transport, pedestrian and cycle routes.	Ref 253
BCS8: Delivering a Thriving Economy	3		1	Suggestion it is reviewed to reflect market conditions re: office floor space retention.	Ref 358, 369, 383, 419
BCS10: Transport and Access Improvements	1		4	Suggestions for how the policy could be revised to better control cars, heavy vehicles and prevent shared spaces. One comment objects to its removal and another advises it will need amending to reference to the JTS and JSP.	Ref 253, 288, 290, 317, 336
BCS11: Infrastructure and Developer Contributions			56	While there were no explicit objections to the removal of the policy, the majority of comments referred to the need for infrastructure to support large scale development. A large number of responses were related to a mass response submitted in relation to CDS7 – Central Bedminster. Some made reference to the sort of facilities desirable through CIL and s106 funds, including child-friendly facilities, sports facilities, doctors and schools.	Ref 1, 11, 14, 16, 23, 31, 35, 48, 50, 60, 64, 66, 69, 72, 73, 77, 80, 86, 98, 107, 108, 110, 113, 116, 119, 121, 143, 146, 148, 156, 160, 161, 167, 176, 188, 189, 192, 197, 208, 214, 221, 223, 224, 233, 243b, 259, 267, 286, 287, 304, 307, 342, 346, 368, 390, 427
BCS20: Effective and Efficient Use of Land			1	Promotion of development site in alignment with BCS20.	Ref 409
DM12: Retaining	4			Object to the loss of DM12, which should focus on	Ref 291, 358, 369, 383

Policy	Object	Support	Comment	Summary	References
Valuable Employment Sites				preventing the loss of employment space.	
BCAP41: The Approach to Harbourside	1			Object to loss, should be replaced by policy focusing on protection of and promotion of economic regeneration through tourism development in the Harbourside area	Ref 442
Policies to be Retained					
BCS7: Centres and Retailing		1		Support retention of policy, suggested amendment to include Imperial Park as a district centre.	315
BCS12: Community Facilities			1	Local Plan Review should have more emphasis on community and cultural facilities and should be a requirement of every major development.	243b
BCS16 Flood Risk and Water Management			1	Should be revised to include specific reference to the requirement to ensure no adverse impact on third party interest resulting from new development or associated mitigation measures, in accordance with the National Planning Policy Framework	405
BCS19: Gypsies and Travellers and Travelling Showpeople			1	Evidence base for this policy is outdated and policy will need updating. South Gloucestershire Council wish to explore cross-boundary working on this policy topic.	428
DM15: Green Infrastructure Provision		3	1	Should be enforced more effectively.	Ref 297, 306, 369, 370
DM17: Development involving Green Infrastructure		1		Should be enforced more effectively.	Ref 306
DM21: Development of private gardens	1			Object to current policy as it is used to permit development and loss of green infrastructure.	Ref 255
DM23: Transport			2	Currently consistent with JSP however should be monitored	Ref 336, 378

Policy	Object	Support	Comment	Summary	References
Development Management				and changes reflected as necessary. Parking policy should vary by area – reference to PTAL in the London plan.	
DM29: Shopfronts, Signage and External Installations			24	Policy required on outdoor advertising especially digital advertising/billboards to reflect changes in technology and impacts on privacy, wellbeing, the environment and disproportionate impact on deprived areas.	Ref 49, 51, 79, 83, 91, 99, 100, 109, 120, 132, 142, 149, 154, 168, 175, 190, 204, 220, 222, 225, 238, 288, 292, 317
DM37: Unstable Land			1	Coal Authority state that important that new development recognises coal mining legacy and positively addresses related problems.	Ref 410
SADMP Appendix A Parking Standards Schedule			2	Need references to electric vehicle charging. New dwellings must include adequate parking spaces.	Ref 127, 139
BCAP9: Cultural and Tourist Facilities and Water-Based Recreation		2		Should apply to development at Western Harbour particularly with regards to loss of caravan site.	Ref 85, 442
BCAP10: Hotel Development		1		Suggest amending to include extension and change of use applications for completeness.	Ref 300
BCAP11: University and Hospital Development		2		Explicit support for hospital and ancillary hospital development within defined hospital precinct is needed.	Ref 264, 393
BCAP26: Old City- Reducing Traffic		1		Policy needs to be strengthened.	Ref 253
BCAP 29: Car and Cycle Parking		2		Policy needs to be strengthened. Parking policy should vary by area – reference to PTAL in the London plan.	Ref 253, 378
BCAP 30: Pedestrian Routes			1	Network is unambitious: it needs to be expanded and some deadlines set for improvements.	Ref 253

Policy	Object	Support	Comment	Summary	References
BCAP32: Quayside Walkways			1	Some progress has been made but standards and deadlines should now be set.	Ref 253
BCAP37: High Street, Wine Street and Castle Park	1			Should be amended to include reference to Central Health Clinic site.	Ref 393
BCAP SA6 Site Allocation at Redcliffe			1	Allocation needs reviewing – has not been let for offices despite extensive marketing.	Ref 419
All retained policies			1	Respondent made detailed comments with regard to all existing policies.	Ref 267

44. Consultees who made 'No Comment'

Two respondents noted the consultation but had no comments at this stage. They are included in the total number of respondents but are not listed against any policies.

Table 76 Consultees who responded with 'no comment'

Consultee	Reference
Canal and River Trust	257
National Grid	281

Appendix A: List of Respondents

072	Abbott, Tracey
320	Abraham, Cllr Peter
350	Acorn Property Group
358	Action For Balanced Communities
021	Acton–Campbell, Rob
292	Adblock Bristol
082	Ahtow, Ricky
112	Alexander, Kirsty
418	Apsley House Capital Ltd
194	Architecture Centre, The
115	Artspace Lifespace
186	Ashton Vale Industrial Estate Occupiers
127	Atwell, John
253	Avon Area Ramblers
340	Avon Gardens Trust
337	Avon Wildlife Trust
310	Avonmouth Planning Group
380	Azko Nobel CIF Nominees Ltd
042	Badrocke, Lucy
141	Baker, Jane
209	Ballard, Caitlin
226	Bamford, Deasy
214	Barnard, Claire
052	Barnes, Richard
436	Bartlett, K W J
051	Basden, Stuart
145	Batley, Wendy
381	BBC Pension Trust Ltd
180	Beale, Thomas
136	Beard, Jasmine
307	Beaumont, Charlotte
137	Beavon, Janis
234	Bedminster Down & Uplands Society
360	Bedminster Green Landowners Consortium
201	Belfin, Becky
217	Beresford, Colin
074	Bergne, Theresa
303	Berkeley Group, The
353	BGCP
388	Bird Group of Companies, The
382	BL Flooring Supplies Ltd
030	Blake, Ben

347	BOC
317	Bolton, Cllr Charlie
162	Bolton, Georgina
169	Bond, Sam
003	Boni, Vanessa
109	Bottin, Laura
102	Boushel, Margaret
441	Bowes, Valerie
263	Bradfield, John
154	Bradley, Ian
080	Bradshaw, Sally
425	Bright Green Futures
268	Brislington Conservation and History Society
313	Bristol Alliance
002	Bristol Avon Catchment Partnership
286	Bristol Child Friendly City Group
378	Bristol Civic Society
406	Bristol Energy Network
326	Bristol Port Company
293	Bristol Walking Alliance
190	Brook, Andy
181	Broome, A&S
174	Brown, Faith
099	Brown, Mark
435	Brown, Mavis & George
252	Brymain Investment Ltd
274	BS3 Planning Group
188	Burbridge, Amy
014	Burt, Sheena
415	Business West
438	Butler, Rachel
068	Campbell-Clause, Will
257	Canal & River Trust
094	Capstick, Natalie
370	Carey, Joy
061	Carr, Maralyn
222	Carlake, David
066	Carter, Kathryn
187	Cartwright, Allison
024	Cartwright, Rachel
366	CBRE Global Investors
419	CEG
177	Chandos Neighbourhood Association
421	Cleverley, PJ
267	Clifton and Hotwells Improvement Society
383	Clifton Down Community Association
120	Clover, Julian

410	Coal Authority, The
434	Coles, Elaine
228	Collier, Derrick
329	Collier, Lindsey
089	Cooke, Nigel
063	Copleston, Laurence
248	Cote Charity, The
093	Cowley, Nick
138	Cox, Janice
255	CPRE Avonside
423	Crafer, Jessica
413	Crest Nicholson
400	Crest Strategic Projects & Stratland Hicks Gate Ltd
442	CSJ Planning
374	Cubex Land Ltd
334	D2 Planning Ltd
361	Dandara
012	Davies, Stephen
269	Davis, Peter
117	Bristol Wood Recycling Project
311	Deeley Freed Estates & Sydney Freed Holdings
113	Dempsey, Kieran
130	Dempster, Joanna
331	Derrick, Diana & Jonathan
035	Dickinson, Mick
318	Dingle, Samantha
395	Disbudak, Melahat
275	Dix, Caroline
126	Drowley, John
091	Duffy, Nick
392	Dundry & Hartcliffe Wildlife Conservation Group
078	Eagle, Sarah
232	Earis, Philip
377	Ed Ware Homes
321	Eddy, Cllr Richard and Quartley, Cllr Kevin
364	Edward Ware Homes
041	Edwards, M
134	Ellis, Jazz
122	Elwell, Josh
351	England Nature Partnership
405	Environment Agency
018	Evans, S
433	Farrow, Bernard
006	Field Arts Projects
362	Firmstone Consortia One Ltd
430	Fishponds Co-Build

075	Fitzjohn, Tessa
356	Ford, Jennifer
020	Ford, Roger
231	Fox, K
375	Frances Firmstone
013	Frank Bruce & Co Ltd
043	Friedland, Lionel
256	Friends of Badock Wood
164	Friends of Dundridge Park
399	Friends Of Lamplighters Marsh
302	Friends of the Earth
010	Friends of Troopers Hill
049	Frost, Ruth
011	Frost, Stephen
221	Fryer, Daniel
355	Fusion Students
384	Galliford Try Partnerships
183	Garland, Alan
368	Gathering Voices
385	GE CIF Trustees Ltd
239	Gee, Paulius
207	Gillard, Bryony
168	Gillett, Robbie
417	Gladman Developments
411	Globe House LTD
240	Goulandris, Cllr John
261	Green Futures Associates
193	Grossman, Anja
073	Guy, Thomas
379	H2 Development Management
055	Hackett, Neil
150	Halfpenny, J
131	Halladey, Jo
443	HARP Planning Consortium
223	Harris, David
149	Harris, J
070	Harvey-Samuel, Vanessa
365	Hatton Garden Properties
133	Hawker–Meadley, Jess
308	Hawkins, Cheryl
332	Hawkins, Derek
129	Hayers, Joanne
212	Hazel, Caroline
007	Heath, Suzanne
284	Highbridge Landowners
271	Highbury Residents Association

336	Highways England
155	Hillitt, Liz & Tony
246	Historic England
386	HJ Heinz Pension Trust Ltd
022	Holbrow, Guy
085	Holden, Richard
048	Holway, Sarah
250	Home Builders Federation Ltd, The
031	Hoos Construction Ltd
038	Houghton, Melanie
146	Houghton, Tom
065	Howe, Colin
124	Hucker, Jonathan
333	Hughes, Derek
040	Hunt, Martyn
422	Iles, Gillian
414	Initiative Homes Ltd
110	Insull Lara Marie
309	Irere Kingdom 1 Ltd & Irere Kingdom 2 Ltd
312	Irwin, Chris
001	Jackson, Zoe
230	James, Dianne
196	Jasper, Anne
123	Jeanes, Jonathan
205	Jeffrey, Bridget
056	Jivram, Monique
216	Jones, Chris
341	Jones, Gareth
156	Jones, Helen
062	Jones, Lee
028	Jones, Nikki
185	Jowett, Alex
315	Junction Nominee 1 Ltd and Junction Nominee 2 Ltd (Imperial Park)
178	Kay, Elisa
034	Kellas, Miranda
140	Kelly, Jane
054	Kelly, Nick
191	Kemp, Andy
254	Kentucky Fried Chicken (Great Britain) Ltd
114	Kidwell, Nicholas
132	Killick, John
262	Kingsdown Conservation Group
060	Kingston, Mark
202	Kinnear, Ben
179	Kirby, Ellis
427	Knowle West Future

017	Lambert, Sam
396	Land & Buildings Ltd
170	Lanham-Cook, Selena
004	Lansdowne, Tony
095	Larwood, Karen
260	Lascelles, Henry
159	Laurence, Glynis
407	Lawrence Weston Neighbourhood Planning Group
189	Lear, Andrew
108	Leslie, Lindy
107	Lewington, Liz
330	Lewis, David & Susan
163	Lewis, Georgina
259	Lexis Nexis
247	Littlewood, Tom
176	Loades, Elspeth
258	Long Ashton Parish Council
175	Lyttleton, Emma
157	Maddox, Hayley
045	Maddox, Tommie
148	Mair, James
444	Malago Valley Conservation Group
402	Malone, Sarah
160	Manning, Giles
344	Marchesini, Gianluca
199	Martin, Barry
206	Mason, Bryan
200	Massey-Chase, Becca
280	McCallion, Brian & Tina
416	McCarthy MP, Kerry
215	McConnell, Claudia
300	McGrath Group Ltd
218	McGuinness, Colin
103	McMahon, Maggie
172	McVey, Fiona
016	Meadley, Sam
079	Medlicott, Sheryl
139	Mills, Janet
026	Mizen, Paul
097	Montgomery, Mary
219	Moody, Colin
081	Moore, Robert
053	Morgan, Peter
033	Morris, Gillian
203	Moss, Ben
387	Moss Europe Ltd

403	Motorcorner Ltd
037	Munro Pascoe, Paula
281	National Grid
349	Natural England
025	Nendick, Phillip & Hazel
208	Network Rail
204	Newman, Beverley
227	Newrick, Debra
409	NHS Property Services
023	Nicholas, Leila
251	Nike Group of Companies
437	Nisbet, Gareth
119	Norman, Julian
305	North Somerset Council
426	Northern Slopes Initiative, The
233	Norton, Laura
128	O'Byrne, John
371	Old Brewery MMC
057	Osborne, Melanie
046	Owen, Tina
147	Pales, James
151	Palmer, John
153	Partridge, Ian & Stephanie
047	Partridge, Stephanie
424	Pearle, SJ
298	Pelican Development Management Ltd
346	Percival, Gina
301	Persimmon Homes
044	Phillips, Linda
224	Pickford, David
135	Picton, Jason
276	Pitt, Caroline
323	Planware Ltd
152	Player, Ian
050	Porteous, Rob
282	Positive Impact Community Housing (PICH)
077	Potter, Simone
439	Pow, Nicola
032	Preston-Jago, Natasha
210	Price, Carol
287	Pride of Place
297	Raffle, Angela
059	Rands, Martin
404	RARA
285	RCAS
372	Redcliff MCC LLP

359	Redrow Homes and Newcombe Estates
184	Reuer, Alexandra
198	Riddock, Ashley
290	Ringer, Arne
171	Riva, Gaia
106	Rogers, Louise
104	Rooke, Lynda
064	Ross, Kirsten
161	Roul, Geraldine
389	Rouncefield, Mary
100	Round, Mark
069	Rowell, Vibeke
166	Royle, Adam
211	Rundle, Carol
058	Rundle, Martyn
339	Russell, Frances
316	Salmon Harvester Properties Ltd
144	Savage, James
237	Sefton-Jenkins, Diana
084	Sharples, Richard
213	Shea, Christopher
291	Shepherd, Abigail
087	Sibille, Raphael
098	Siddorn, Martin
158	Silverman, Gus
197	Skatova, Anya
314	Smart, Christine
357	Smith, Patricia
295	Somerset County Council
343	South Bristol Business
428	South Gloucestershire Council
431	South West Transport Network
270	Southmead Centre Partnership Project
265	Sovereign Housing
342	Sport England
354	Square Bay
283	SSE
029	St George Community Network Group
322	St Mary Redcliffe
294	St Modwen Developments Ltd
327	St Mungos
288	St Pauls Planning Group
111	Stagg, K
071	Steel, Valerie
420	Stenning, Miriam
369	Stevens, Cllr Clive

273	Stirling, Dr Charles
266	Stoke Bishops Residents Planning Group
432	Stokes, David & Joan
272	Stokes Morgan Planning
324	Stratland (Hicks Gate) Ltd
009	Strickland, Susan
039	Stride Brothers Ltd
304	Stuckey, Denis
397	Sustrans
027	Sutherland, Oliver
279	Swain, Diana
142	Tarlton, James
249	Taylor, Charlotte
121	Taylor, Josh
299	Taylor Wimpey
096	Tedder, Michelle
125	Tetlow King Planning
408	Theatres Trust
105	Thomas, Robert
005	Tiny House Community Bristol
092	Townsend, Nick
173	Trezvenant, Fiona
393	University Hospitals Bristol NHS Foundation Trust (UHB)
264	University of Bristol
319	University of Bristol Sustainability Team
363	Urban Tranquility Developments
394	UWE
338	Vassal, Fabien
390	Veal, Martin
245	Vence LLP and Ashton Gate Ltd
348	Visual Arts South West
165	Walker, Richard
289	Waller, Andrew
243	Walton, Carol
412	Watkin Jones Group
192	Webb, Andy
101	Webber, Margaret
220	Welch Corinne
325	Welding Industries Ltd
296	Wesley Action Group
345	Wessex Water
352	West of England Community Homes (WECH)
244	WHAM Community
182	Wherlock Adam
335	White, Jill Dr
019	White, M

090	Wickham, Nick
076	Wickham Stephen
036	Wide, Kim
229	Wijeyesekera Dilhani
225	Wilcox, David
238	Wilkes, Karen Dr
118	Wilkins, Julie
167	Williams, Rhiannon
015	Williams, Sandra
278	Williamson, Cathy
116	Willis, Kate
195	Wilson, Anna
086	Wise, Paul
277	Withers, Catherine
367	Wolfe, Emily
306	Woodland, Trust
083	Worsnops, Richard
398	Wyevale Garden Centres Ltd
067	Yardley, Kate
008	Yates, Suzanne
143	Young, James
401	YTL Developments