

Lawrence Weston Neighbourhood Development Plan

Bristol City Council comments on Submission Version

1. Parts of the plan that are in conflict with strategic policies of the Local Plan

It is considered that the following matters are not in conformity with the strategic policies in the Local Plan. If the suggested changes are not made, the Council will advise the examiner when the plan is submitted that there is conflict with those strategic policies.

| Policy/para. | Comment | Suggested change | |
|--------------|---|--|---|
| Policy H3 | <p>Policy H3 and the accompany Table 1 Appendix 1 do not reflect the affordable housing percentages and thresholds in the Local Plan (Local Plan policies BCS17 and DM3)</p> <p>(It is acknowledged that in practice several of the smaller sites, under 10 units, are likely to come forward with 100% affordable homes. There is no policy requirement in the Local Plan for affordable housing on sites of less than 10 units, although schemes for 100% affordable housing would not be prevented from coming forward. However, the policy as written effectively precludes the development of any market housing on these smaller sites and this is in conflict with the Local Plan)</p> | <p>In Table 1 all affordable housing percentages sought should be amended to reflect the Bristol Local Plan.</p> <ul style="list-style-type: none"> Sites of 15 dwellings or more should indicate 30%. Sites of 10 to 14 dwellings should indicate 10%. The affordable housing policy should not apply to sites of fewer than 10 dwellings. <p>The commentary to the table should be deleted.</p> | <p>Revise policy to read:</p> <p>Policy H3 Widening Affordable Housing types and tenures.</p> <p>New developments should seek to provide a broader range of affordable housing types and tenures beyond social housing. Development on allocated sites will be supported if;</p> <ul style="list-style-type: none"> affordable housing is provided in accordance with the figures in Table 1 Appendix 1. If this is not the case, the developer must demonstrate through a clearly evidenced open book viability assessment why the identified levels cannot be achieved; and affordable housing provided is integrated with market housing; and Shared ownership or Custom-build housing comprises at least 20% of sites with 10 or more dwellings; and schemes for co-housing and other self-organised community building projects have been facilitated where possible. |

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| | The requirement for 20% custom build housing in this policy is in conflict with the Local Plan as custom build is not necessarily a form of affordable housing. (Local Plan policy BCS17) | Remove reference to custom-build in this policy. | See amended table 1, appendix 1 below. |
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Amended Table 1, Appendix 1

| Site | Homes Estimate | % Affordable | Affordable homes |
|---------------------------------|----------------|---------------------------|-------------------------|
| Henacre site | 50 | 30% | 15 |
| College site | 92 | 20% <u>30%</u> | 18 <u>28</u> |
| Deering Close | 20 | 30% | 6 |
| Deansmead Depot | 5 | 100% | 5 |
| Lawrence Weston Road | 5 | 100% | 5 |
| Chapel Lane | 7 | 100% | 7 |
| Deansmead | 18 | 30% | 5 |
| Astry Close | 38 | 70% <u>30%</u> | 27 <u>11</u> |
| Oakhanger/Littlemead | 28 | 30% | 8 |
| Capel Road | 48 | 30% | 14 |
| Awdelete | 32 | 30% | 10 |
| Long Cross Pub | 9 | 100% | 9 |

POLICY SSP1

Comments

Business uses and a community facility are not requirements of the SA&DMP Local Plan, so the policy as drafted would be in conflict with the strategic policies of the Local Plan. Some rewording of the policy is needed to clarify this. In order to avoid conflict with the Local Plan policy, it is also necessary to clearly separate the policy requirements and those matters which are being encouraged and may be addressed through mechanisms outside the remit of the Neighbourhood Plan. Other amendments are needed to ensure consistency with the Local Plan.

Suggested changes:

~~Development on the Henacre site must be informed by a Design and Planning Brief which assesses the potential for the development of work and training spaces along with the impacts of constructing around 50 dwellings on the site. Delivery of a mixed-use development with approximately **at least** 50 homes on the Henacre Site (Ref BSA0101 in the SA&DMP Local Plan) is expected **encouraged**.~~

Any development on the site must have regard to the adjacent Baptist Church site; with provision made in the design for the two sites to be integrated in terms of design, linkages to be promoted and the sites to enhance each other.

Development should:

- ~~• provide ‘multifunctional’ spaces, including an area of formal green space which is well integrated with the existing facilities and contributes to the security of the new dwellings by providing passive surveillance; and~~
- conform to other policies in this plan; and
- be informed by a site-specific flood risk assessment as the site is subject to flood risk and is greater than 1 hectare; and
- take account of the aviation fuel pipeline to the north of the site; and
- retain and, **where possible**, improve the cycle track including linkages to the existing cycle network (see Map 4); and
- the planning application must be accompanied by an ecological survey of the site and, where appropriate, make provision for mitigation measures such as ~~protecting and~~ enhancing the wildlife corridor; and
- be informed by a Health Impact Assessment, with involvement of the local primary health care providers regarding impacts on primary health care services; and
- be informed by a contaminated land assessment submitted with any planning application as the site was formerly used as a tip (EPA 1990); and
- ~~• enable a proportion of the space to be left undeveloped and safeguarded for public use, including mountain bike track, which could form part of a sustainable urban drainage scheme; and~~
- ~~• secure and enhance the future use of existing recreational facilities such as the BMX track and play facilities; and~~
- ~~• provide a viable, flexible workspace to support local entrepreneurs, start-up businesses, and social enterprises; and~~

- provide the **consider** infrastructure for future Combined Cool Heat and Power /District Heating schemes to service development.

Development will be encouraged to:

- **provide ‘multifunctional’ spaces, including an area of formal green space which is well integrated with the existing facilities and contributes to the security of the new dwellings by providing passive surveillance; and**
- **enable a proportion of the space to be left undeveloped and safeguarded for public use, including mountain bike track, and which could form part of a sustainable urban drainage scheme; and**
- **secure and enhance the future use of existing recreational facilities such as the BMX track and play facilities; and**
- **provide a viable, flexible workspace to support local entrepreneurs, start-up businesses, and social enterprises.; and**

Preparation of a Design and Planning Brief which assesses the potential for the development of work and training spaces along with the impacts of constructing a minimum of 50 dwellings on the site will be encouraged.

Justification SSP1

- 16.1.1 The Henacre site has been identified in the SA&DMP Local Plan. **The Local Plan estimated 150 homes for the site and stated a minimum of 50 should be provided.** The land is currently open green space that was considered surplus to requirements in June 2012. There are concerns relating to anti-social behaviour on the site and it is perceived to be unsafe at night.
- 16.1.2 ~~This site acts as an important buffer between the residential uses and the industry beyond the motorway.~~ A proportion of the green space ~~should~~ **could** be maintained for sustainable urban drainage and/or to mitigate any potential flood risk from the Avonmouth/Severn flood plain rhine network. The potential development of a thermal grid heat distribution / district heating system scheme in Avonmouth adjacent to this site makes it sensible to provide infrastructure for its potential extension here.
- 16.1.3 Development on the site would help to reduce the number of incidents in the area through passive surveillance from residents in the new dwellings.
- 16.1.4 The documents relevant to this site include; the West of England (WoE) Sustainable Drainage Developers Guide, Bristol Surface Water Management Plan (SWMP) and Avonmouth Strategic Flood Risk Assessment (SFRA).

POLICY SSP2

Comments

A community facility specifically on the site is not a requirement of the SA&DMP Local Plan, so the policy as drafted would be in conflict with the strategic policies of the Local Plan. The estimated number of homes is not specified in the policy text. Some rewording of the policy is needed to clarify this and to be consistent with the Local Plan’s affordable housing policy. In order to avoid conflict

with the Local Plan policy, it is also necessary to clearly separate the policy requirements and those matters which are being encouraged and may be addressed through mechanisms outside the remit of the Neighbourhood Plan. Other amendments are needed to ensure consistency with the Local Plan.

Suggested changes:

A mixed use development of housing, community, retail and a small element of office uses on the College Site (ref site BSA0102 in the BSADMP) is encouraged. The estimated minimum number of homes for this site is 80.

Development **should** will be supported provided that;

- ~~it promotes a mix of uses in order to provide opportunities to undertake day-to-day activities, including work on site and offers an ‘integrated approach to housing, economic uses and community facilities and services’; and~~
- ~~it conforms to other policies in this plan; and~~
- ~~developer **contributions** are obtained to help to provide a new **towards meeting the recognised local need for** community **and health facilities on site or in the local area**; and~~
- ~~the land identified for a community facility shall not be developed for any other primary purpose; and~~
- ~~it protects and enhances the character of the area by corresponding with the quality standards and design objectives of the Lawrence Weston College Site Planning and Design Brief 2014; and~~
- ~~it addresses any cycle parking, car parking, traffic and road safety issues; and~~
- ~~it carefully considers servicing of the supermarket; and~~
- ~~it maximises retail and employment benefits; creating local labour opportunities both in the development stage and once the site is in use in accordance with policy JSB2 of this plan; and~~
- ensure the scale and character of the new proposed development is in keeping with the existing Ridingleaze centre while effectively catering to its proposed catchment area; and
- **be informed by a retail impact assessment if the proposed retail use is larger than 2,500m²; and**
- ~~20% 30% of housing will be affordable; the final percentage to reflect commitment and contributions to other community benefits on the site; and~~
- ~~it contributes to improving the physical environment at Ridingleaze and to the delivery of a health and community facility through Planning Obligations and Contributions (Policy BCS7); and~~
- ~~supports the existing planning approval for the Community Hub; and~~
- ensure the site is considered as a whole from a urban design perspective with cycle and pedestrian links to and from Ridingleaze given prominence and priority; and
- ~~ensure connection and integration between each individual development and existing built infrastructure through an overarching masterplan; and~~
- ensure combined cooling heat & power (CCHP) schemes for the development are considered.

Development will be encouraged to:

- **Promote a mix of uses in order to provide opportunities to undertake day-to-day activities, including work on site and offers an ‘integrated approach to housing, economic uses and community facilities and services’; and**
- **ensure connection and integration between each individual development and existing built infrastructure through an overarching masterplan; and**

- **protect and enhance the character of the area by corresponding with the quality standards and design objectives of the Lawrence Weston College Site Planning and Design Brief 2014; and**
- **support the existing planning approval for the Community Hub.**

Justification SSP2

- 1.1.1 This 2.8 Ha site comprises land that was formerly occupied by the Lawrence Weston College of Further Education, which in turn replaced the Lawrence Weston secondary school in August 2002 (Lawrence Weston College Site Planning and Design Brief 2014).
- 1.1.2 The land, owned by City of Bristol College and BCC, was identified in the SA&DMP Local Plan as a site for mixed-use development. As a guideline, the LW Housing Needs Study 2013 states that housing should be split as follows:
- Up to 16 one-bed flats
 - Up to 40 two-bed houses
 - Up to 37 three-bed houses
- 1.1.3 The College Site Planning and Design brief identifies land for the development of a new retail outlet, such as a supermarket. This would improve the retail offer in Lawrence Weston whilst creating new jobs. The design brief suggests providing space for 1800 m² of retail space with car parking.
- 1.1.4 The vacant college site is also an opportunity for the estate to create a new community hub. 2000m² of the site has been identified for the community hub in the development brief (see Map 12). The community buildings review details 3 potential options for developing the site. Community research and the failure of the neighbourhood to comply with Local Access Standards suggests there is a need for a GP surgery and health services, a centre for adult learning and training, a library, a social meeting space and a flexible workspace/artist/hobby space.
- 1.1.5 Community research from the Community Plan states that 80% of residents want a better library, 71% want to see new/improved health facilities and 69% want to see provision of employment, debt and benefit support. These services should all be considered in the plans for a new community facility.

POLICY SSP3

Comments

It is not a requirement of the SA&DMP Local Plan that as much open space as possible should be retained, so the policy as drafted would be in conflict with the strategic policies of the Local Plan. The estimated number of homes is not specified in the policy text. Some rewording of the policy is needed to clarify this. In order to avoid conflict with the Local Plan policy, it is also necessary to clearly separate the policy requirements and those matters which are being encouraged and may be addressed through mechanisms outside the remit of the Neighbourhood Plan. The reference to improving an adjoining green space is in conflict with the Local Plan as it appears to place requirements regarding a location which is not clearly identified. Other amendments are needed to ensure consistency with the Local Plan.

Suggested changes:

Encourage community involvement for development of Deering Close (ref site BSA0103 in SA&DMP Local Plan). **The estimated number of homes for this site is 20.**

Any development on this site should;

- be of an appropriate scale and type for the site; and
- be designed to respect the topography and landscape of the site; and
- be informed by an ecological survey of the site and, **where appropriate,** appropriately mitigate any issues that may arise **make provision for mitigation measures;** and
- retain as much of the open space as possible, and seek to enhance and improve this for public use
- **ensure that undeveloped parts of the site are given suitable landscape treatment in order to achieve an appropriate relationship with development on site and the wider areas, as parts of the site are likely to be undevelopable;** and
- provide suitable access and mitigate any traffic issues associated with increasing the number of residents in an already densely populated area; and
- retain the public rights of way **that passes through the southern part of the site,** and improve passive surveillance of this and personal safety for pedestrians; and
- ~~be informed by a resident-led design brief, produced in partnership with land owners; and~~
- conforms to other policies in this plan.

Development will be encouraged to:

- **be informed by a resident-led design brief, produced in partnership with land owners.**

Justification SSP3

- 1.1.6 This 1 hectare site has been allocated in the SA&DMP Local Plan. The site is part privately owned and part owned by Bristol City Council. There is a public right of way that passes through the site.
- 1.1.7 A site specific design brief ~~should be used~~ **is encouraged** to collect the appropriate data to inform any decision on **the development of** what could potentially be a difficult **the** site to develop.
- 1.1.8 The community would like to see improvement to the existing street environment, which is dominated by car and van parking, to the exclusion of any residential social use or value.
- 1.1.9 The street scene would be considerably improved by ~~sacrificing some of the bordering but inaccessible green space to provide~~**ing** additional parking suited to residents.
- ~~1.1.10 The community would like to see improved social value of the adjoining green space by making it accessible and usable for recreation and community use. This is not in conflict with the allocated development provided such development is designed with this and the needs of the existing community as a goal.~~

2. Parts of the Plan that are potentially inconsistent with national policy

It is considered the matters below are potentially inconsistent with the National Planning Policy Framework. If the suggested changes are not made, the Council will draw these matters to the examiner's attention.

| Policy/para. | Comment | Suggested change |
|--------------|--|---|
| Policy H4 | The requirement to 'adhere' to the guidance in the Lawrence Weston Design Statement is considered likely to be in conflict with the NPPF. | <p>Revise policy to read:</p> <p>Policy H4 Excellence in building design and sustainability</p> <p>New development will be expected to maintain high standards of design; and</p> <ul style="list-style-type: none"> • adhere have regard to guidance set out in the Lawrence Weston Design Statement; • should strive to implement 'outstanding or innovative designs' which help raise the standard of design more generally in the area; and • residential development should be assessed against the 12 objectives in the Buildings for Life 12 guidance, obtain green levels in all 12 and pursue a fabric-first approach to low energy design; and • demonstrate that adaptability for future needs has been considered in the design. <p>Development proposals will not be supported if they are of poor design that fails to improve the character and quality of an area and the way it functions.</p> |
| Policy H6 | The policy as drafted could infer that the local lettings policy is part of the neighbourhood plan. As the policy will be implemented by Bristol City Council's Strategic Housing service the policy should be deleted. Support for the policy should be | <p>Revise policy to read:</p> <p>Policy H6 Local Lettings Policy</p> <p>The Bristol City Council Lawrence Weston Local Lettings Policy is supported and should be implemented in 50% of new affordable homes (as set out in</p> |

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| | <p>expressed in the existing commentary and the commentary amended to make clear that the policy is Bristol City Council's.</p> <p>(NB. Reference to the local lettings policy in the Neighbourhood Plan is subject to confirmation from the council that the policy is operational. If appropriate, a web link to the council's website can be provided to view the policy).</p> | <p>Appendix 2).</p> <p><u>Justification H6 Local Lettings Policy</u></p> <p>2.1.1 <u>The Bristol City Council Lawrence Weston Local Lettings Policy is supported.</u> Many of the socially rented homes in Lawrence Weston are of poor quality, and unsuitable for local needs, (LW Housing Needs Study 2013). For many years residents have been reporting instances of young families and the elderly in particular having to move out of the area as there was no suitable housing for them. This <u>The Bristol City Council</u> policy aims to strengthen community cohesiveness by offering some of the proposed new, better quality housing to long-term residents in housing need who may otherwise leave the area. In this way people, who have remained committed to the area despite problems, including inadequate housing, will be encouraged to build the long term residents' base and community stability.</p> <p>2.1.2 The neighbourhood has a problem with high turnover of tenants (LW Housing Needs Study 2013); those requiring social housing are frequently being transferred from other parts of Bristol to Lawrence Weston despite the location not being appropriate for their needs. As a result, some of the residents in Lawrence Weston lack the incentive to contribute positively to the community as they regard it as a temporary solution to their housing aspirations. Encouraging longer term residents to stay and rewarding loyalty will help counter this high turnover. It will also help to build a better reputation for Lawrence Weston so that new entrants to the area are encouraged to become longer term residents.</p> <p>2.1.3 This local lettings policy <u>The Bristol City Council policy</u> will ensure that a significant proportion of those taking up the new housing in the area are either existing residents or have family associations with the area that require them to move into Lawrence Weston.</p> <p>2.1.4 The policy requires only 50% of any new affordable housing to apply the local lettings policy, so that remaining 50% of new affordable</p> |
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| | | <p>housing will remain available for those on the Local Authority housing lists using the normal banding system. Those houses for which the local lettings policy applies should incorporate a mix of dwelling types consistent with the overall mix of the development.</p> <p>2.1.5 This policy will be implemented through the Bristol City Council Lawrence Weston Local Lettings Policy (see Appendix 2).</p> |
| Policy SSP5 | The NPPF indicates (paragraph 189) that developers cannot be required to consult communities at the pre-application stage | <p>Policy SSP5: Future redevelopment of current clinic site, Ridingleaze</p> <p>A mixed use development on this site will be supported and could include the following uses:</p> <ul style="list-style-type: none"> • a social space for families to meet, new community facilities, performing or meeting space • a care home or an extension to Blaise Weston Care Home <p>It must conform to other policies in the plan and be subject to robust community consultation. <u>is encouraged.</u></p> |