

Bristol City Council

Draft Broadmead Neighbourhood Design Code Supplementary Planning Document

Consultation Statement

1. Introduction

Bristol City Council (“the Council”) is required to prepare its Supplementary Planning Documents (SPDs) in accordance with the procedures set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (“the Regulations”). Regulation 12(a) requires that before an SPD is adopted, a Consultation Statement must be prepared setting out who was consulted in connection with preparation of the SPD, a summary of the main issues raised in those consultations and how those issues have been addressed in the SPD.

This requirement is reflected in the Council’s Statement of Community Involvement 2015 (“SCI”), requiring a Consultation Statement to be issued with the draft SPD, ahead of the statutory consultation period.

The draft Broadmead Neighbourhood Design Code SPD (“the draft SPD”) provides supplementary detail to policies concerned with a number of topics within the Council’s new Local Plan (Publication Version, November 2023) (“the Local Plan”). It provides supplementary detail to key Local Plan policies focused on design quality, including Policy DS1, DS1A, DPM1 and DC1 among others, providing clarity on how the policies should be interpreted and applied.

The SPD is a design code that sets out design requirements for the physical development of Broadmead in Bristol City Centre, as defined in Policy DS1A. It builds upon the design vision expressed within the Bristol City Centre Development and Delivery Plan, 2023 (“DDP”), focusing on the fundamentals of designing a high quality, liveable urban neighbourhood.

Design quality is a core component of national planning policy, with the National Planning Policy Framework 2023 (“NPPF”) Paragraph 134 clear that design codes should be set out in SPDs in order to carry sufficient material weight. NPPF Paragraph 139 states that development that is not well-designed should be refused, especially where it fails to take account of SPDs such as design codes.

2. Consultation process

The draft SPD has been informed by consultation with several key stakeholder groups invited to participate in the preparation of the document. The objective of the preparatory consultation included:

- raising awareness of the SPD and opportunities to get involved;
- testing emerging thinking and canvass opinion on key topics; and
- helping shape direction and content of the draft SPD.

All stakeholders were contacted by the Council via email. A summary of the stakeholder groups and the dates when they were consulted can be found below. For the full list of stakeholders consulted please see appendix 1.

	Stakeholder group	When
1	Bristol City Council Local Plan Working Group	14 October 2024
2	Historic England	23 October 2024
3	Developers	24 October 2024
4	Bristol Civic Society	24 October 2024
5	BIDs and Ward Councillors	28 October 2024
6	Bristol City Council Local Plan Working Group	18 November 2024
7	West of England Centre for Inclusive Living	19 November 2024

Table 1 List of stakeholder groups and the dates they were consulted

The consultation events took the form of dedicated one-on-one meetings held online via Microsoft Teams, with the exception of the Bristol City Council Local Plan Working Group (“LPWG”) meetings which were held in-person.

The format of the sessions commenced with a presentation providing an overview of the context and scope of the draft SPD, the process to date and future programme, the core principles shaping the approach to the draft SPD, an explanation of the document structure and example of page from each section of design coding. The presentation was followed by a roundtable discussion to share feedback and reflections on the emerging content and the ways in which it could assist in addressing specific stakeholder priorities.

In some cases, a working draft of the draft SPD was issued to stakeholders in advance of the meeting. Consultation with the LPWG requires documentation to be issued in advance of the meeting to provide sufficient time for review and comment, in accordance with Council procedures. The LPWG sessions therefore focused on a brief presentation providing an overview of the document, inviting comments and questions in a roundtable format.

Consultation with the West of England Centre for Inclusive Living (“WECIL”) also involved issuing a working draft version of the draft SPD in advance of the meeting. This allowed WECIL sufficient time to review the draft design coding in greater detail, making recommendations on how inclusive design could best be embedded into the document. These comments were discussed in a follow-up one-to-one meeting to discuss and expand on comments shared.

3. Summary of key issues raised and how they were addressed

The nature of the consultation focused on the preparatory status of the draft SPD and as such feedback mainly related to general strategic matters including its structure, coverage of topics and Local Plan policies being supplemented. This was accompanied by some detailed comments on specific content, mostly provided by LPWG or WECIL based on their detailed review of a working draft of the document.

A summary of the key areas of feedback can be found below, organised into general and detailed thematic comments (C) and how they have been addressed (A) in the draft SPD.

General comments

- C** Comments were raised about the appropriateness of Broadmead for such transformative redevelopment and the level of residential densification envisaged.
- A** A page was added to the draft SPD introduction setting the context for transformational change in Broadmead, making reference back to new Local Plan Policy DS1A and Bristol City Centre Development and Delivery Plan.
- C** Comments were raised about the use of technical design terminology and awareness that the SPD will have both a technical and ‘lay’ audience, meaning some terms will be unknown to all.

- A A glossary of terms can be found at the back of the draft SPD document which defines technical terms used in the document. Where technical terms are used they are identified in bold font, signalling to the reader to refer to the glossary if they are unsure of meaning.
- C Comments were raised about needing to be clear that ground floors are to be used primarily for shops and businesses, rather than residential, to maintain Broadmead as a principal mixed-use destination in Bristol's city centre.
- A The document makes frequent reference to the need for non-residential uses at ground floor, making references out to the ground floor uses strategy in Part A of Bristol City Centre Development and Delivery Plan. Where shared residential entrances are required at ground floor, the draft SPD makes clear these should be located on tertiary streets which are most appropriate characters for this type of ground floor use.
- C Comments were raised about the SPD needing to provide the right balance between clarity and certainty around design quality, whilst allowing flexibility for different design solutions and site conditions that could otherwise limit innovation.
- A The draft SPD operates on a principle of 'comply or justify' and is explained in the introduction to the document. This approach places emphasis on compliance with the *principle*, rather than one design solution. Moreover, where departure from the principle is necessary the SPD permits applicants to justify their approach by making a robust and evidence-based reasoning for doing so.

Context and character

- C Comments were raised about the importance of appreciating Broadmead's local context and character, encouraging design proposals that respond to this.
- A The draft SPD includes design codes that focus on fundamental aspects of local character and context, emphasising positive characteristics found in Bristol's existing urban fabric, such as the neighbouring Old City. These include a creation of a fine, permeable urban grain; frequency of active ground floors and their articulation of elements; distinct layering of ground, middle and upper levels; the creation of local views to improve distinctiveness and legibility; as well as specific focus on how to respond to individual heritage assets found in Broadmead e.g. 'The Hub'.

Heritage

- C Comments were raised about the need for design codes to be clear in encouraging sensitive design responses to heritage assets in Broadmead.
- A The draft SPD includes an annotated plan and corresponding table identifying Listed Buildings and Locally Listed Buildings alongside hyperlinks to additional online information about their significance and value. For each asset appropriate design responses were identified, including both urban design and detailed design responses, with diagrams and precedent photography illustrating how the responses can be deployed.

Ecology

- C Comments were raised regarding the use of green and blue infrastructure to not only boost climate resilience but also create a range of habitats for wildlife within urban areas.
- A Clear references were added throughout the draft SPD to emphasise the importance of green and blue infrastructure for climate resilience, biodiversity and habitat creation.

Building heights and massing

- C Comments were raised about the need for greater clarity about the areas where increased building heights and massing should contribute to a transformation in character; and where they should be more sensitive and respond to the existing character.

- A** The draft SPD includes a prevailing building heights framework that directly relates to the intention for the character of Broadmead and its immediate setting. This includes making a clear distinction between those areas appropriate for ‘conserve’ i.e. where the context has a coherent and valued character new buildings keep the same height of the context to consolidate character; ‘enhance’ i.e. where the character is positive but is not fully coherent and new buildings can complement and evolve it with modest increases in height; and ‘transform’ i.e. where the context is fragmented and/or poor and can be transformed entirely, more significant heights are possible.

Inclusive design

- C** Comments were raised about how inclusive design could be best integrated into the SPD to support objectives for Broadmead that is accessible and safe to use for people of all ages, abilities and backgrounds.
- A** The draft SPD includes an overarching design priority for inclusion and safety, with this message folded into a number of design codes and toolkits, including emphasising the importance of provision for accessible play and spaces teenage girls within the public realm. Review by WECIL identified a number of areas of detail for design of the public realm and communal areas in residential developments, now reflected in the document.

Ground floor servicing

- C** Comments were raised about the servicing of ground floor commercial units and how the needs of independent businesses in Broadmead could be met, which may differ from larger chain shops.
- A** The draft SPD includes design codes focused on servicing and deliveries, with these codes expanded to refer to specific challenges facing the servicing of independent businesses, including the need for close access to on-street bays for quick and efficient unloading.

Neighbourhood spaces

- C** Comments were raised about the role of Broadmead as a neighbourhood, needing to balance and make space for the needs of both visitors and residents within the public realm.
- A** The draft SPD public realm design codes were expanded to include specific reference to the role of tertiary streets in providing calmer environments away from the busier primary and secondary streets. These streets adopt an intentional landscape design that reflects their dual role in providing outdoor space for both visitor and resident use.

Dual aspect homes

- C** Comments were raised about the importance of emphasising dual aspect homes as a design priority and how the SPD could amplify this expectation.
- A** The draft SPD includes a specific design code on dual aspect dwellings and their role in maximising comfort, amenity, flexibility and adaptability, with justification provided through the rationale and toolkit. Dual aspect dwellings are referenced throughout different design codes, emphasising their role in helping kitchen, living and dining areas feel generous and naturally ventilated; and how family-sized dwellings are best located on plot corners or podium-level maisonettes.

Podium level courtyards

- C** Comments were raised about the need to protect ground floors for commercial uses and therefore the need to provide communal residential courtyards and gardens at podium level, rather than street-level.
- A** The draft SPD includes a specific design principle on the need for all primary outdoor amenity space to be provided as podium-level courtyards or gardens. Where courtyards are

provided at street-level, these form extensions of the public realm and positively interface with commercial uses at ground floor.

4. Additional comments

During the preparatory consultation some additional comments were raised by stakeholders that fell outside the scope of the SPD. Whilst these have not been addressed in the draft SPD the Council will consider other means for addressing such feedback. A summary of key issues is captured below.

Tall buildings policy

- Comments were raised about the need for a Local Plan policy on tall buildings, setting out locations appropriate or inappropriate for their development and guidance on suitable height ranges. As SPDs cannot create new policy, a policy of this kind requires formulation through the Local Plan, before then being supplemented through a draft SPD.

Place management and programming

- Comments were raised about the importance of securing affordable food provision within Broadmead. To become a well-rounded neighbourhood, it was felt existing and future residents need access to supermarket options within walking distance, rather than multiple small convenience shops. This comment relates to the leasing of ground floor units and how an appropriate mix could be curated to support neighbourhood needs.

Maintenance and management

- Comments were raised about the need for lifts in residential buildings to have clear maintenance and repair plans in place in perpetuity, to ensure inclusive access for those that rely on lifts for accessing their home. This extends beyond design and could be addressed and secured through individual building management plans.

Public realm design

- Comments were raised about detailed design of the public realm that expands outside of the fundamental aspects of design captured in the draft SPD e.g. integrating signage. These comments can be addressed by the Public Realm Design Manual being prepared for Broadmead.

5. Next steps

Following the preparatory consultation informing the direction and content of the draft SPD, a statutory consultation period will now take place on the draft SPD. This will take place for a minimum of 4 weeks in accordance with the Regulations and will be supported by publicity and an online survey to encourage public participation, alongside formal representations made by stakeholders.

Following this period of consultation, feedback will be reviewed and, where appropriate, updates made to the final SPD. The consultation statement will be updated to reflect the nature of the comments shared and the outcome these have had on the content of the SPD. Subsequent to this the SPD will be formally adopted by the Council's Cabinet, with the SPD and a supporting adoption statement being uploaded to the Council website.

Appendix 1

List of consultees

	Stakeholder group	Individual stakeholders
1	Bristol City Council Local Plan Working Group	Bristol City Council Local Plan Working Group
2	Historic England	Historic England
3	Developers	AEW Deely Freed Federated Hermes Fifth State Goram Homes Hammerson Marks and Spencer Olympian Homes
4	Bristol Civic Society	Bristol Civic Society
5	BIDs and Ward Councillors	Bristol City Centre Business Improvement District Broadmead Business Improvement District Cllr Ani Stafford-Townsend Cllr Sibusiso Tshabalala Redcliffe and Temple Business Improvement District
6	Bristol City Council Local Plan Working Group	Bristol City Council Local Plan Working Group
7	West of England Centre for Inclusive Living	West of England Centre for Inclusive Living

Table 2 List of stakeholder groups and the corresponding individual stakeholders consulted