

## Bristol City Council's response to Inspectors' Document IN2

This statement sets out the council's response to the Inspectors' Preliminary Questions.

### Council's introduction

The council notes that, since it received the Inspectors' Preliminary Questions, the Government has published a [consultation](#) on 'Proposed reforms to the National Planning Policy Framework and other changes to the planning system'. While it is the council's understanding that the Bristol Local Plan will be examined primarily under the [September 2023 NPPF](#) (as per the transitional arrangements set out in both the current and new draft NPPF), the council's responses to the Inspectors' questions also make reference to certain relevant elements of the Government's consultation.

The council further notes that the 'main modifications' suggested in response to the Inspectors' questions below are not the only ones that the council has suggested to date. The schedule of suggested main modifications (EXA002) is a live document, an initial version of which was published in July 2024, containing several suggested modifications which still apply.

The Inspectors' questions are shown below in ***bold italics*** with a border, following any preamble to the question also in ***bold italics***. The council's responses are shown in normal typeface below the Inspector's questions.

Main modifications arising from the Inspectors' questions are set out in grey tint boxes.

Some of the council's responses to the Inspectors' questions refer documents not previously referred to during the examination. **Appendix 5** lists the additional documents that can now be added to the examination library. There are also passing references to a number of other documents and web sites, which have been referenced for information or to provide additional context. In these cases, web links have been provided.

### Responses to Inspectors' questions

#### ***Duty to Co-operate***

***As far as we can tell, the Council has not submitted a specific 'Duty to Cooperate' statement as advocated by paragraph 1.15 of the Local Plan Procedure Guide. Document PAL001<sup>1</sup> states that the two statements of common ground, PAL006<sup>2</sup> and PAL007<sup>3</sup>, demonstrate compliance with the Duty.***

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<sup>1</sup> PAL001 – Soundness, Legal and Procedural Requirements Note

<sup>2</sup> PAL006 – Statement of Common Ground between Bristol City Council and Bath and North East Somerset and South Gloucestershire Councils

<sup>3</sup> PAL0087 – Statement of Common Ground between Bristol City Council and North Somerset Council

**PQ1. It would be helpful if the Council could provide, or point us to, specific evidence relating to when and how the Council engaged constructively, actively and on an on-going basis with other local authorities on strategic matters, including but not limited to the matter of unmet housing need? In responding, the Council should clearly set out the timing and chronology of engagement, the main mechanisms used and what matters are outstanding, if any, and what the latest position is on these.**

Council's response

In accordance with national planning practice guidance (Plan-making: paragraph 010) two statements of common ground have been published and form part of the evidence of this examination. The statements are i). the joint statement of common ground with the other constituent members of the West of England Combined Authority [South Gloucestershire and Bath & North East Somerset] (PAL006) and ii). a separate statement with North Somerset Council (PAL007).

These statements provide a written record of the progress made by those authorities during the on-going process of planning for strategic cross boundary matters. They document where cooperation has taken place and specify cross boundary matters. They form the submitted evidence that Bristol has complied with the duty to cooperate. The comments below provide some further information in response to the preliminary question:

*Timing/chronology*

The process of cooperation has, necessarily, been on-going throughout the time the new Bristol Local Plan has been under preparation. The process can be considered to have spanned the preparation of the withdrawn Joint Spatial Plan Published November 2017 (to which PCD001 and PCD002 refer) and the halted Spatial Development Strategy through to the positions set out in the statements of common ground. As indicated in the statements of common ground, the processes of cooperation or joint working continued including through the commissioning and consideration of joint evidence as each authority moved forward to complete local plans without a strategic level plan in place.

A key stage of the strategic matters cooperation process was the letter of Bristol City Council to the neighbouring authorities of 31 October 2023 (PAL008 and appended/referred to in the statements of common ground PAL006 and PAL007). This letter identified the strategic cross boundary matter of an unmet housing need and sought the authorities' cooperation in considering meeting a proportion of those needs through their local plan processes.

During the processes of cooperation on strategic matters, the neighbouring authorities have not maintained any positions advising of unmet need within their areas where a contribution from Bristol City Council could be envisaged. No strategic approaches from further afield have been received.

*Main mechanisms*

Operational cooperation has been maintained through weekly meetings of officers from the West of England Combined Authority authorities and monthly with those officers and North Somerset which is not part of the Combined Authority. Separate operational meeting of officers of Bristol and North Somerset have taken place throughout. All these meetings continue.

A further mechanism of strategic matters cooperation has been the joint commissioning of evidence (much related to the halted SDS as well as the local plans) as evidenced by documents EVEE01, EVEG01, EVEN05 and linked commissions regarding local housing need assessment.

There have been various informal meetings and discussions between lead elected members of the authorities throughout the process.

Consultations have taken place at each stage of preparation of the respective local plan consultations where matters relevant to the duty to cooperate have been raised. Results are identified in the Statement of Consultation (CSD006).

As discussed below, in response to Bristol City Council's request regarding unmet housing need, the neighbouring authorities are considering the request through the mechanism of their local plans. Any agreements regarding sharing unmet need would be agreed through memoranda of understanding (or similar) agreed by elected members.

### *Outstanding matters*

With regard to the request by Bristol City Council for a proportion of unmet housing need to be considered (PAL008), no agreements have yet been reached with any neighbouring authority as to whether any unmet need will be absorbed by them. Each authority has been considering this through their local plan processes. At present the position in those authorities is:

- South Gloucestershire Council – regulation 18 consultation on Local Plan Topic Paper for Housing Land Supply and Bristol Unmet Need currently underway Regulation 18 - Local Plan Topic Paper for Housing Land Supply and Bristol Unmet Need - [South Gloucestershire New Local Plan | BETA - South Gloucestershire Council \(southglos.gov.uk\)](#) This consultation is due to finished on 13<sup>th</sup> September and Bristol City Council has made a response.
- North Somerset Council – ongoing local plan process. In the light of the government's recent announcements regarding planning reforms the council has said it is currently considering the implications and its next steps. An intended consultation in the Autumn will no longer be taking place [North Somerset Council reviewing Local Plan | North Somerset Council \(n-somerset.gov.uk\)](#)
  - Bristol/North Somerset Statement of Common Ground (PAL007) paragraphs 3.26 and 3.27 refer to the area at A4174 Colliters Way and removal of land from the Green Belt. Both authorities agree there are exceptional circumstances to warrant removal of this land from the Green Belt in order to contribute to meeting housing need in a sustainable location. North Somerset Local Plan 2039 Pre-submission Plan (Reg 19) November 2023 proposed that land north of Colliter's Way, Long Ashton is allocated for residential development (215 homes) with a site requirement '*to coordinate development with land in Bristol City*'. See also above bullet point.
- Bath and North East Somerset – ongoing local plan preparation process. The council is understood to be carefully considering the impact of the draft national planning reforms on the current Local Plan programme and will provide a further update in due course [The Local Plan | Bath and North East Somerset Council \(bathnes.gov.uk\)](#)

- The matter of a cross boundary development location at the Brislington area is considered as a strategic matter as referenced in paragraph 3.34 of the joint statement of common ground. See also answer to PQ49.

### *Emerging national planning policy*

It is noted that the publication of the proposed changes to the National Planning Policy Framework published on 30 July 2024 and the parallel consultation on a revised standard method for determining housing need will, if implemented, have direct implications for the approach that will be taken in adjoining authorities, having regard to the proposed transitional arrangements set out in draft NPPF paragraph 226 onwards: [National Planning Policy Framework: draft text for consultation \(publishing.service.gov.uk\)](https://www.gov.uk/government/consultations/national-planning-policy-framework-draft-text-for-consultation) There are also provisions related to the early commencement of new plan making in cases where the adopted housing requirement in plans subject to the proposed transition arrangements are more 200 homes per annum lower than the relevant published Local Housing Need figure.

***PQ2. Could the Council also provide, or point us to, evidence relating to how the requirements of the Duty have been met with respect to prescribed bodies other than local authorities? Any response should also include details of the strategic matters the Council needed to address, what was done to discharge the Duty, what was agreed and what matters, if any, are outstanding.***

### Council's response

The essence of the duty to cooperate is that local planning authorities and the prescribed bodies must all co-operate with each other in maximising the effectiveness of the preparation of development plan documents relating to strategic matters. Strategic matters are identified as sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas.

All the relevant prescribed bodies cooperated, where necessary, with the city council throughout the preparation of the new local plan. The council has not identified any strategic matters relevant to the local plan which could not be addressed for want of cooperation by any one of the other prescribed bodies. None of the other prescribed bodies have identified matters, relevant to the scope of the duty, that remain to be discharged.

Throughout the process of plan preparation (and the related processes of preparation of the strategic plans which were not progressed), the council has engaged with the other prescribed bodies through direct consultation on stages of plan preparation as identified in the Statement of Consultation (CSD006) and through meetings, which included strategic forum meetings which were held during the period of preparation of the halted Spatial Development Strategy (these meetings included infrastructure/services providers and utilities in addition to prescribed bodies).

***PQ3. Finally, we note that neither of the Statements of Common Ground appear to be signed. Could the Council confirm that these statements have been agreed by the relevant authorities?***

Council's response

The two statements of common ground have been agreed by the signatory authorities - Bristol City Council, Bath & North East Somerset Council and South Gloucestershire Council (PAL006) and Bristol City Council and North Somerset Council (PAL007).

There is on-going consideration of Bristol City Council's request regarding unmet housing need as discussed in response to PQ1. If these processes result in an agreement to accommodate a proportion of unmet need arising from Bristol's housing need calculation, such agreement will be reflected in signed statements to that effect (e.g. memorandums of understanding signed by elected members, and/or updated SoCGs, or such memorandums appended to SoCGs).

***Habitats Regulation Assessment***

***PQ4. Under section 1.1 of the Habitats Regulation Appropriate Assessment (HRA), it states that the Council is "currently" in the process of preparing a Stage 2 Appropriate Assessment (AA) as part of the HRA process. For the avoidance of doubt, could the Council confirm whether or not it is currently carrying out any additional AA over and above what is set out in this document?***

Council's response

The council can confirm that no additional Appropriate Assessment is being undertaken. The statement in section 1.1 is a reference to the process that was on-going in preparing the assessment and is now finished with the publication of the assessment.

***PQ5. On page 11 of the HRA, it is stated that consultation on the pre-Submission version of the Plan took place during the preparation of the AA. Natural England's representation to the Regulation 19 consultation refers to the AA being completed prior to the examination and that their comments were based on the screening report. Could the Council confirm whether Natural England have been consulted on the AA and, if so, what is the outcome?***

Council's response

Natural England was notified of the completed Habitats Regulations Appropriate Assessment on 10 May and was asked on 24 May if there were any points for discussion. A follow-up request for observations was made by email on 17 June.

Natural England confirmed by email on 24 June that it intended to respond imminently. The Council followed up again on 25 July, and at the time of submitting this response to the Inspectors' preliminary questions no response has been received. The Council will contact Natural England again and will advise on any response as soon it is received.

Natural England were consulted on the earlier stages of assessment preparation. The screening stage section of the assessment refers to this - HRA Appendix A:A1 (PAL005).

**PQ6. Given the AA was being prepared during the Regulation 19 consultation, could the Council confirm how the recommendations of the assessment have been taken into account in the Plan?**

Council's response

The appropriate assessment (PAL005) has concluded overall that adverse effects on integrity (AEol) on the relevant sites will not arise from the local plan. The recommendations it contains have not resulted in any indications that the local plan as drafted should be modified for reasons related to the habitat regulations.

There are recommendations for actions outside the context of the local plan relating to future possible air quality and recreation impacts on the Severn Estuary and Avon Gorge Woodlands and there is a further recommendation regarding monitoring total housing delivery through the authority's monitoring report. The relevant conclusions and recommendations are discussed below, with reference in turn to Severn Estuary; Avon Gorge Woodlands; and, Any European Designated Site:

Severn Estuary

- *Loss of functionally linked land*

The appropriate assessment concludes that AEol from any loss of functionally linked land (FLL) to qualifying species of the Severn Estuary European marine site (EMS) can be ruled out.

The following recommendation was suggested in the assessment:

*'However, for completeness, it is recommended that the Plan wording in Policy reflect the need for appropriate survey and assessment, including specifically within FLL as well.'*

It is not considered that additional wording in the form of a main modification related to project level survey and assessment is required as that would replicate well understood processes which will be applied in any case.

- *Air quality*

Subject to the mitigation provided by the emerging local plan policies and 'the requirement for project-level assessments', the appropriate assessment concludes that AEol to the Severn Estuary EMS from negative air quality effects can be ruled out.

A recommendation is included which addresses matters for consideration outside the local plan process:

*'It is recommended that a programme of monitoring across the Severn Estuary SAC and Ramsar is developed through engagement with Natural England, the Severn Estuary Partnership, and South Gloucestershire Council, and other partners as appropriate, to assess how air quality impacts the Annex I habitats. A mitigation strategy would be required to provide ways to reduce air pollution if negative effects are identified, which could lead to an AEol.'*

These matters will be considered by the council and its partner organisations outside the local plan process.

- *Recreation*

The appropriate assessment concludes that AEol from recreational disturbance on avian features of the EMS can be ruled out within the plan area. As the appropriate assessment also notes, most of the Severn Estuary coastline at Avonmouth is developed and/or on private land operated by the Port and therefore not accessible to visitors with the only available areas for recreational visits within Bristol associated predominantly with the estuary shoreline around Shirehampton where there is one public footpath along the shore.

The following recommendation is included which sets out actions outside the local plan process:

*'However, as a precautionary measure - a programme of monitoring within the Bristol area for the EMS and FLL is recommended to understand how visitor disturbance impacts qualifying birds of the SPA and Ramsar. Alongside considering in-combination effects within adjacent plan areas, a mitigation strategy is recommended to provide ways to reduce visitor disturbance, if negative effects are identified, which could lead to an AEol. Mitigation could include provision of monitoring information to relevant authorities, introduction of voluntary codes of conduct, awareness campaigns, review and possible amendment to existing management regimes, and zoning of any activity.'*

The council will be considering these matters with neighbouring authorities and Natural England outside the local plan process.

### Avon Gorge Woodlands

- *Air quality*

Subject to the mitigation provided by the emerging local plan policies, 'the requirement for project-level assessments' and the recommendation below, the appropriate assessment concludes that AEol to the Avon Gorge Woodlands SAC from negative air quality effects can be ruled out.

The following recommendation is included which falls outside the local plan process:

*'It is recommended that the following text is agreed upon to set a suitable framework for down the-line investigation of this issue for Bristol City Council: "As allocations for the Bristol City Council Local Plan and Local Plans for adjacent local authorities are being developed, air quality impacts of increased traffic on the A4 within 200m of Avon Gorge Woodlands SAC will require further investigation in the form of traffic and air quality modelling and this will need to consider the effects of Local Plan growth alone and in combination with other plans and projects, including in adjacent local authorities. The developed transport and air quality model should account for vehicle fleet change over the plan period and the already identified sustainable transport interventions. Following this exercise, mitigation may be required to ensure no adverse effect on integrity arises".'*

These matters will be considered by the council and its partner organisations outside the local plan process. It may be appropriate to add the recommended text as part of ongoing updates to the council's statements of common ground.

- *Recreation*

The appropriate assessment concludes that AEoI created by the local plan alone via recreational disturbance to Avon Gorge Woodlands SAC can be ruled out, however in-combination effects cannot be ruled out when considered collectively with other adjacent authorities and the recreational disturbance generated from their areas too.

The following recommendation is proposed outside the local plan process:

*'The recommendations outlined for in-combination effects [for the Severn Estuary] should also be considered in relation to recreational disturbance on Avon Gorge Woodlands SAC considers that: increased visitor pressure, noting a major factor may be from illegal access, needs to be considered further in-combination with nearby authorities, e.g. North Somerset Council, as well as key delivery bodies, outside the plan-making process. With the former process established, application of project-level assessment and mitigation, and with consideration for the effects of projects cumulatively, any in-combination effect is considered to be addressed.'*

These matters will be considered by the council and its partner organisations outside the local plan process.

The development proposed by the local plan and neighbouring authorities' local plans will be delivered gradually over a number of years, and it will take time for in-combination effects, if any, to be felt. The prompt review of local plans and wider strategic planning processes envisaged as a result of proposed changes to national planning policy (if the draft NPPF July 2024 provisions are implemented) will provide a subsequent occasion for in-combination effects to be explored in a development plan context.

*Any European Designated Site - exceeding the housing requirement*

The following recommendation falls outside the local plan process but is addressed through annual monitoring:

*'Finally, as set out in section 7, it is recommended that through the usual programme of monitoring of the Local Plan set out within the Annual Monitoring Report, that the HRA AA should be reviewed to understand whether there are AEoI for any of the EDS should the plan exceed the total proposed growth within Policy H1.'*

The trigger for the possibility of AEoI would be when policies of the local plan were resulting in housing delivery in excess of 34,600 from the base date (Policy H1 'Delivery of new homes – Bristol's housing requirement'). Whilst it is not necessarily the case that there would be AEoI if more than 34,600 homes were to be built, the Annual Monitoring Report would flag whether such a level was approaching or had been reached. In practice, the local plan will be subject to review well before any such level of homes is at or near completion. If the local plan is adopted next year it will be subject to review by around 2030 (or sooner if the draft NPPF July 2024 provisions are implemented). Even though Policy H1 has an uncapped housing requirement of at least 1,925 homes per year, it is unlikely that 34,600 additional homes would have been completed by 2030; this would require a completion rate of over 4,325 homes per year which is highly improbable.

### **Superseded policies**

**Regulation 8(5) of the 2012 Regulations states that where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy. We note that paragraph 1.5 of the Plan suggests that it will replace all aspects of the existing local plan. Elsewhere in the Plan there are references to areas covered by existing Neighbourhood Development Plans, for example Hengrove and Knowle West and Lawrence Weston. Paragraph 1.6 also refers to the wider development plan including the Joint Waste Core Strategy (2011)**

**PQ7. Could the Council provide clarity on what documents constitute the full development plan and what policies are expected to be superseded by the Plan, as required by Regulation 8(5)?**

#### Council's response

The documents which constitute the current full development plan are:

##### **Local Plan documents:**

- Joint Waste Core Strategy (March 2011)
- Bristol Core Strategy (June 2011)
- Site Allocations and Development Management Policies Local Plan, including its Policies Map (July 2014)
- Bristol Central Area Plan, including its Policies Map (March 2015)

##### **Neighbourhood Development Plans:**

The following neighbourhood development plan documents which have been 'made' part of the development plan for Bristol:

- Old Market Quarter Neighbourhood Development Plan (March 2016)
- Lawrence Weston Neighbourhood Development Plan (March 2017)
- Hengrove and Whitchurch Park Neighbourhood Development Plan (March 2019).

The policies to be superseded by the new Local Plan are all those contained in:

- Bristol Core Strategy (June 2011);
- Site Allocations and Development Management Policies Local Plan (July 2014); and
- Bristol Central Area Plan (March 2015).

All policies in the Joint Waste Core Strategy (March 2011) and made Neighbourhood Development Plans will remain in force.

A suggested modification to paragraph 1.5 has been added to the Schedule of Suggested Main Modifications (EXA002) based on the above text to ensure clarity. This is shown below:

Paragraph 1.5:

~~Is the whole local plan changing? The new local plan~~

1.5 The new Bristol Local Plan ~~will~~ comprises a single document with an annex about development allocations, supported by a Policies Map. ~~When the review started it was expected that many existing policies ('retained policies') would be carried forward from the current local plan where they remained up to date and relevant. With the passage of time and changing strategic context it became~~

necessary to rewrite the whole of the local plan. Some of the policies in this version of the local plan are very similar to those in the existing local plan where they continue to be consistent with national planning policy and support the local plan's overall aims and objectives. Its policies replace all those of the Bristol Core Strategy (June 2011), Site Allocations and Development Management Policies Local Plan (July 2014) and Bristol Central Area Plan (March 2015). Policies contained in made Neighbourhood Development Plans continue to be in effect as part of the development plan.

### **Consultation**

***The Bristol Local Plan Publication Version Equality Impact Assessment (2023) details various communities that the Council engaged with as part of the plan making process. Although we have noted the representations relating to consultation/engagement in respect of Policies DS3 and DS4, it is not clear whether further representations have been received.***

***PQ8. Could the Council confirm whether any further representations have been received in respect of the consultation process?***

#### Council's response

Three further representations were made in respect of the consultation process:

- Bristol Civic Society (representor ref. 285) considered there had been a failure to develop effective design policies with local communities which reflected their aspirations.
- Dominic Hogg (440) was of the view that 'Consultation has taken place in ways which have made it difficult for anyone to understand what the plan, in its entirety, looks like until this Regulation 19 Draft was published.'
- Bristol Tree Forum (148) considered that the council had 'not conducted a proper consultation'. They were concerned that it was not possible to tell whether their comments to earlier consultation documents had been considered in preparing the Local Plan Publication Version.

The council considers that the Local Plan consultation process was carried out in accordance with its adopted Statement of Community Involvement (PAL003) and the requirements of the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

The Statement of Consultation (CSD006) details the range of engagement methods used for the three main Local Plan preparation stages. It also provides a comprehensive summary of the main issues raised from each of these stages and how they were addressed in the Local Plan Publication Version (CSD001).

### **General questions**

***Various policies in the Plan refer to other documents, including but not limited to supplementary planning documents, that are not part of the development plan. Some of these appear to be existing and some to be produced. Such***

***documents may be material considerations that it would be appropriate to have regard to when determining planning applications. However, it is unlikely that a policy requiring plans or applications to comply, accord, or be in line with such documents, would be justified.***

***PQ9. Could the Council identify all parts of policies in the Plan that refer to other documents (that are not development plan documents) and consider whether it is necessary to refer to each and, if so, whether the reference is appropriately phrased?***

Council's response

The table at Appendix 2 shows the various policies which refer to specified other documents including Conservation Area Character Appraisals; local design guides and codes; development and delivery plans, spatial or regeneration frameworks or masterplans; emerging Bristol Avon Flood Strategy; proposed or existing supplementary planning documents; and refuse standards. In a number of other places, explanatory text refers to other documents.

Some policies also refer to practice notes and marketing guidelines which have an operational role of providing advice on the implementation of local plan policies. Various existing local plan policies including those for affordable housing and climate change have been supported by such practice notes for many years.

The approach of referring to other documents takes forward the approach in the current local plan and is consistent with adopted local plans elsewhere, such as the examples from adopted local plan documents for Salford and South Gloucestershire (Appendix 1). In such policies in the Bristol Local Plan and plans from other areas, whilst the local plan policy will afford relevance to those documents referenced, those documents would continue only have their relevant status in planning terms, with the local plan being the first consideration in decision making. It is noted that SPDs have specified processes including consultation and challenge provisions and more informal documents such as frameworks are also subject to consultation.

Development strategy policies – Policies DS1 to DS14 are the key policies for setting out locations for growth and changed, along with E4 'Avonmouth Industrial Area and Bristol Port' and DA1 'Proposed development allocations'. The Development Strategy chapter policies are facilitating policies which enable thousands of new homes and other forms of development to be brought forward. The policies, which set out the approach to each area, are rightly intended to be supported by further documents which will address the delivery of the policy. The development industry and local stakeholders are expecting such documents will be in place to provide further detail. The policies are wording in a similar way to those referenced above included in adopted local plans elsewhere. This is considered appropriate.

Various policies in the Bristol Local Plan Publication Version November 2023 refer to existing SPDs where it is intended that those SPDs will continue to be relevant. This approach is similar to that used in the existing Core Strategy (DPD001) (for example Policy BCS21 'Quality Urban Design') and the Bristol Central Area Plan (DPD003) and the adopted policies from elsewhere referred to in Appendix 1.

Some policies indicate that there will be supplementary planning documents to address specific matters. The various references to those future documents are considered appropriate.

**PQ10. Appendix 2 lists other documents that are referred to in the Plan and/or evidence base that may be referred to in subsequent discussions. Could the Council ensure that these documents are provided so that we can place them in the Examination Library?**

Council's response

These documents were published on the Examination Library webpages on 2 August 2024.

**We have noted that a number of policies refer to development being “expected to” or “should” meet certain requirements. Similarly, several policies refer to the Council “encouraging” certain uses or outcomes.**

**PQ11. For the avoidance of doubt, and to assist in subsequent discussions, could the Council confirm how it expects this wording would generally be interpreted by decision makers?**

Council's response

The current adopted local plan uses similar wording ('will be expected to'; 'should'; 'will be encouraged') in the policies in various contexts throughout its three documents - Core Strategy (DPD001); Site Allocations and Development Management Policies Local Plan (DPD002); Bristol Central Area Local Plan (DPD003). It is envisaged that decision makers would interpret the wording in the new Bristol Local Plan in a similar way, having regard to the context and the framework of national planning policy.

The use of 'will be expected' in a policy can be considered as a policy expectation with an expected outcome or action. The form of wording is used about a hundred times in the current adopted local plan policies and about 160 times in the new Bristol Local Plan policies. The term could be considered to have a similar meaning or effect as 'should' in the National Planning Policy Framework (September 2023) which is frequently used with a similar context and purpose.

'Should' is used many times in adopted local plan policies and is used in a similar way in the new local plan. It can also be considered as a policy expectation with an expected outcome or action. In the current and new local plan the use of 'should' often follows the 'will be expected' phrasing when listing items as in, for example, Policy BG1 'Green infrastructure and biodiversity in new development'.

The phrase 'will be encouraged' generally refers to a type or form of development which can be supported provided it is otherwise consistent with local plan policies. The inclusion of such a type or form of development would be material in a decision having been identified by the local plan as appropriate to be encouraged in a specified context or at a specific location. The term is used about 40 times in current local plan policies and about 25 times in the new Bristol Local Plan in a similar way. The approach is similar to use of 'encourage' statements in the National Planning Policy Framework (September 2023). For example, paragraph 210 which states that planning policies '*...should set out policies to encourage the prior extraction of minerals...*' Both adopted local plan policy DM38 'Minerals Safeguarding Areas' and new Bristol Local Plan Policy UM3 'Minerals Safeguarding Areas' reflect this national statement in words which say that prior extraction '*will be encouraged*'.

‘Encouraging’ is used once in a new Bristol Local Plan policy. This is in Policy SSE2 ‘Development in Bristol’s centres’ where the use has a similar effect to ‘will be encouraged’ as discussed above.

***We have also noted that a number of policies refer to development being expected to be “in accordance with all other relevant policies”, or similar wording to that effect.***

***PQ12. Given that it is generally understood that the development plan should be read as a whole, could the Council explain why it considers these references necessary? In addition, does the Council envisage any potential issues with requiring development to be in accordance with all relevant policies when there may situations where said policies pull in different directions?***

Council's response

There are about seven policies which refer generally and additionally to development being ‘in accordance with all other relevant polices’ or a similar phrase. In general, the statement acts to confirm that development referred to in a policy is subject to the other relevant policies. This assists in interpretation of the policy’s scope and intent and can also act to advise or reassure stakeholders who may be less familiar with how local plans are used.

This approach to policy carries forward the approach which is taken in the adopted local plan where it is used in about seven policies (SA1 and BCAP SA1 to 6). For example, Site Allocations and Development Management Policy Local Plan 2014 Policy SA1 ‘Site Allocations’ (DPD002) includes uses the wording: *will be developed for the uses identified and in accordance with the accompanying development considerations set out in the Annex ‘Site allocations information’ and with all other relevant development plan policies.* The new local plan brings forward this approach in Policy DA1 ‘Proposed development allocations’ which uses the same wording.

In addition to Policy DA1, the new local plan uses the above wording to similar effect in Policies DS11 ‘Development allocations – south west Bristol’, DS12 ‘New neighbourhood – Bath Road, Brislington’ and E4 ‘Avonmouth Industrial Area and Bristol Port’. In those cases, a policy making positive allocations of land for a particular use or uses, is confirming that relevant other policies are also to be used in arriving at the permissible form of development. In the case of Policy E5 ‘Industry and Distribution Areas’ a similar approach is used to indicate that generally acceptable uses remain subject to the other relevant policies. This repeats similar wording in the adopted Site Allocations and Development Management Policy Local Plan 2014 Policy DM13 ‘Development proposals on Principal Industrial and Warehousing Areas’ which has parallels with Policy E5.

Situations where policies could be said to pull in different directions should not generally arise (and have not in practice) because the cross reference is to *relevant* policies. Policies which are not relevant would not be applied. In cases where an allocating policy would change the permissible use from that which exists, the allocated use would prevail over any general policy which might otherwise aim to preserve that use. This would be, and has been in practice, evident in context.

### **Site Selection Methodology**

**Document TPC001<sup>4</sup> provides an overview of the site selection process. The Strategic Housing Land Availability Assessment (SHLAA)<sup>5</sup> also provides some information on the assessment of housing sites.**

**PQ13. To assist our understanding of the site selection process, could the Council point us to, or provide a more detailed explanation of what assessment of potential allocations, for all uses, was carried out, including:**

- what criteria were used to determine whether a site should be allocated or not for any particular use (including any criteria for 'sieving' sites at an early stage)?**
- how and when these assessments took place?**
- what evidence or information was used to inform this process?**
- what potential sites or areas were considered unsuitable for allocation and why, and where are these assessments documented?**

**PQ14. Within the response to this question, could the Council be specific as to how the individual and cumulative effects on the transport network, biodiversity and flood risk in particular were considered?**

#### Council's response

##### *Site assessment*

The site selection process largely replicates that undertaken in the Site Allocations and Development Management Policies Local Plan July 2014 (DPD002) and the Bristol Central Area Plan March 2015 (DPD003).

Sites were sieved out where the site was within a Ramsar site, Special Protection Area (SPA), Special Area of Conservation (SAC), Site of Special Scientific Interest (SSSI), National Nature Reserve, Scheduled Ancient Monument or Ancient Woodland. Health and Safety Executive Inner Zones were also not included.

The sites were then assessed against mapped data in the context of the adopted local plan policies, emerging plan policies, national planning policy and other assessments such as the open space assessment outlined in TPC005 Local Green Space and Reserved Open Green Space - Topic Paper and analysis of areas currently identified as Principal Industrial and Warehousing Areas (PIWA) outlined in TPC003 Employment Land Topic Paper.

Other factors including access, infrastructure, ground conditions (such as historic mining, land instability and underground structures), potential for contamination, flood risk, surface water flooding, hazardous risks, pollution, landscape, agricultural land classification, ecology and heritage were also used to assess the sites with input from relevant internal consultees where appropriate. This informed whether the site was considered appropriate for allocation, the uses proposed, the development considerations and informed the estimated capacity.

Sites were not considered suitable for allocation where the site was required for another use or purpose (such as for open space). The SHLAA (EVEH01) documents

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<sup>4</sup> TPC001 – Development Allocations and Designations Process Topic Paper

<sup>5</sup> EVEH01 – Strategic Housing Land Availability Assessment

sites which have not been allocated for numerous reasons, but which may not be inappropriate for development.

*Individual effects on the transport network, biodiversity and flood risk*

TPC001 Allocations and Designations Process Topic Paper (April 2024) states that internal liaison was undertaken with numerous internal specialists including transport colleagues, ecologists and flood risk engineers. Where relevant this resulted in development considerations being added to address issues or, where this was not possible, sites not being taken forward.

Site specific development considerations are included where required by individual effects on the transport network. For instance, Policy DS12 'New neighbourhood – Bath Road, Brislington' includes the development principle that development is supported by local and strategic transport infrastructure.

Sites located partly in Flood Zones 2 and 3, and those subject to surface water drainage issues include development considerations requiring proposals to be supported by a flood risk management strategy, a site-specific flood risk assessment or a drainage strategy, which will be expected to prioritise sustainable drainage systems, ensure no increased flood risk and provide appropriate mitigation. In some cases further specifics are added such as not allowing residential development on the ground floor.

Sites identified as having a potential impact upon biodiversity including those adjacent to Sites of Nature Conservation Interest (SNCI) include development considerations to ensure biodiversity is respected. In addition, new development will be expected to incorporate provision for nature resulting in a biodiversity gain, in accordance with policy BG3 'Achieving biodiversity gains' and the Environment Act 2021.

A full review of all the draft development allocations and associated development considerations was undertaken following the 2019 consultation, utilising the comments received. Issues raised were followed up with relevant internal or external bodies where appropriate. In some instances development considerations have been revised or added to address issues raised, such as the requirement to retain and integrate specific important green infrastructure.

With regard to flood risk, the Environment Agency responded to the 2019 consultation with detailed comments on a number of sites and as a result some proposed development considerations have been revised, or added; for instance, to include the requirement for site development in lower risk areas, or to introduce an 8m buffer adjacent to a main river to allow access. Three sites were also removed due to unresolved flood risk issues.

*Cumulative impacts the transport network, biodiversity and flood risk*

The Housing need and supply topic paper (TCP004) explains that despite the local plan's ambitious focus on delivering homes, it is not possible to deliver the entirety of Bristol's housing need within its boundaries. The standard method including 35% uplift applied to urban centre results in a figure of 3,380 homes per annum whereas the level of housing development which the local plan proposes to accommodate in Bristol is 1,925 homes per year on average up to 2040. The council consider that this level of new development in the local plan:

- can be accommodated with no severe residual cumulative impacts on the road network;
- is appropriate taking into account the likely cumulative effects on the natural environment;
- is acceptable in terms of the cumulative impacts in, or affecting, local areas susceptible to flooding.

### *Transport Network*

EVET01 Highways and transport evidence: Evidence and information note outlines the approach with regard to transport. It states that the local plan proposes specific locations and sites where housing will be delivered with the focus on brownfield development and efficient use of urban land. The development strategy in the local plan sets out a direction for each part of the city and identifies specific locations for change and development, setting out areas of growth and regeneration and locations for new neighbourhoods. The development strategy approach looks at four broad areas of the city: Central Bristol, East Bristol, South Bristol, and North Bristol. EVET01 summarises the capacity of the busiest corridors in each of these areas of Bristol, which will support the proposed increase in housing set out in the publication version of the local plan.

This found that across all corridors identified, the impact would indicate need for mitigation. The type of transport improvements required are identified in the wording of the development strategy policies and the development considerations text associated with specific development allocations; however, the note concludes that this will be refined following the running of the full transport model through WERTM.

The initial indications were that the policy approach in the local plan provides sufficient opportunities for appropriate mitigation for Bristol City Council and other highway authorities impacted.

The WERTM model has been completed to establish a baseline and an estimated forecast of the impact on the transport network of development proposed in the Bristol local plan.

The Local Plan Modelling Outputs Report produced by AtkinsRéalis (July 2024) states:

*'WERTM projects that the location and intensification of additional development (beyond the NTEM8.0 Core Do Minimum travel forecasts) will not lead to a proportionate increase in highway trips. This is due to several factors. By 2042, congestion levels, parking charges, and network capacity constraints resulting from existing and committed developments, along with the density of the Local Plan (LP) development, are expected to drive a greater increase in sustainable travel modes—particularly active travel. The model's capacity constraint projections (volume/capacity %) reveal the broadening and intensification of congested links. In other words, the network was constrained in 2019 and is projected to become more operationally stressed by 2042, regardless of the additional Local Plan development.*

*'The primary message from this modelling exercise is that adding additional housing and jobs (associated with the local plan) does not lead to a proportionate increase in highway trips across the network; the majority of the extra trips are made using sustainable modes of transportation. While this is a positive finding in terms of policy aspirations, it's important to recognize the limitations of WERTM as a strategic tool.*

*AtkinsRealis advises caution in assuming that additional development growth can be seamlessly accommodated without resulting in highway impacts. Thorough detailed checks and suitable mitigation measures are necessary to promote more sustainable travel'.*

The DfT National Trip End Model (NTEM8.0) has been used as part of this process to project housing, population, employment, car ownership and trip rates from 2019 to 2042 and hence used to forecast travel demand in the region.

The site allocations, regeneration areas and Green Belt site releases (Development Strategy chapter) were also assessed against Sustainability Appraisal (SA) Objectives 13 and 14 - to encourage a demonstrable modal shift and reduce the need to travel; and to maintain and improve the existing highway network (Appendix 4 - CSD004d).

The SA acknowledges that whilst the draft site allocations do have the potential to increase the level of congestion above the existing baseline, the uptake of active travel use or public transport modes may help to alleviate additional trip generation. It further noted that draft policies for development and transport, including those to limit parking and increase cycling provision, will likely result in an overall positive effect on levels of vehicular movements associated with new development.

The council does not consider there to be any unacceptable impacts on highway safety or that residual cumulative impacts on the road network would be severe (NPPF September 2023 paragraph 111).

The WERTM report (Local Plan Modelling Outputs Report July 2024) is now available, has been provided with this response and can be added to the examination library.

### *Flood Risk*

TPC002 Flood risk topic paper details the approach taken to flood risk including the application of the sequential test to the development allocations. The development allocations were also tested against SA Objective 15 - To reduce the risk of flooding from all sources (Appendix 4 - CSD004d). It notes that overall, the majority of site allocations are directed towards areas of lower flood risk.

While the specific development allocations largely avoid areas at risk of flooding, this is only possible due to the significant contribution to Bristol's housing capacity made by the regeneration areas. The two sources in combination meet the local plan housing requirement but, as set out in the Flood Risk Topic Paper, are still not sufficient to meet the city's housing need in full.

The risk of flooding has informed the spatial strategy for the city, which proposes to locate development predominantly in areas with a lower risk of flooding and avoids further greenfield development on the functional floodplain. The areas of regeneration all promote regeneration on previously developed land, as an alternative to meeting Bristol's housing requirement on greenfield land within and beyond the city. They make an essential contribution to meeting Bristol's housing requirement and, in turn, its best effort to meet its housing need in accordance with the NPPF.

Three of Bristol's areas of growth and regeneration are significantly affected by tidal flood risk: DS2 'Bristol Temple Quarter', DS3 'St. Philip's Marsh' and DS4 'Western

Harbour' and a further three areas are affected by flood risk of a more fluviially-dominated nature: DS1A 'Broadmead, Castle Park and the Old City'; DS5 'Frome Gateway'; and DS8 'Central Bedminster'.

The three regeneration areas most affected by tidal flooding are within the scope of the emerging [Bristol Avon Flood Strategy](#), which is the long-term plan to better protect homes, businesses, and infrastructure from flooding from the River Avon as outlined in TPC002 Flood risk topic paper. Policies DM2-4 make specific reference to this strategy, with the further support of policy FR2, making clear that development in these locations will require comprehensive mitigation that will not increase flood risks elsewhere.

New development that stands to benefit from reduced flood risk from the future delivery of the strategy will be expected to facilitate the delivery of the flood defences, including financial contributions where appropriate. Cumulatively, development within these areas will help to enable the delivery of strategic flood risk defences in the city centre.

### *Biodiversity*

The development strategy has a focus on regenerating previously developed land and the approach to allocation of land is consistent with that approach and national planning policy.

An Appropriate Assessment (AA) as part of the Habitats Regulations Assessment (HRA) process, to assess the potential for adverse effects on European designated sites (EDS), which may arise from implementation of the new Local Plan has been undertaken.

CSD004d Appendix 4 of the Sustainability appraisal details how SA Objective 11 - To ensure the protection and enhancement biological and geological assets and improve the quality of wildlife habitats, was addressed. It notes no draft site allocations overlap with any of the international or national statutory habitat sites or ecological designations and no draft site allocations overlap with Ancient Woodland designations.

Where draft development allocations have been identified as having a potential impact upon biodiversity development considerations appropriate to the site and the relevant biodiversity are included. In addition, existing allocations in two locations have been removed or reduced to include only previously developed land to reflect the greater priority for biodiversity required in response to the declaration of the ecological emergency. Further detail of this can be found in the response to PQ17.

In considering cumulative impacts it is also noted that, new development will be expected to incorporate provision for nature resulting in a biodiversity gain, in accordance with policy BG3 'Achieving biodiversity gains' and the Environment Act 2021.

### *Assessment timescales*

The assessment process outlined above initially took place in 2018. Representations to the 2019 consultation process informed the review of the development allocations which took place between 2019 and 2023. This process led to additional and revised development considerations and, in some cases where issues identified could not be resolved, the removal of the site from policy DA1 'Proposed development allocations'.

### *Assessment of potential allocations for all uses*

The majority of sites are allocated for an element of residential development reflecting the national policy objective of significantly boosting the supply of homes (NPPF September 2023 paragraph 60). This objective is central to the approach taken in the local plan including the development strategy, the focus on the delivery of new homes and the uses arrived at by the assessment process.

Many allocations also make provision for an element of compatible workspace on sites currently in employment use and in appropriate locations, reflecting paragraph 82 d of the NPPF September 2023, which states planning policies should allow for new and flexible working practices (such as live-work accommodation).

Allocations of an appropriate scale and location within the city centre also make provision for centre uses in line with paragraph 86d of the NPPF.

The other policies of the local plan including those relating to the development strategy (chapter 3); economy and inclusive growth (chapter 7); centres, shopping and the evening economy (chapter 8); community facilities (chapter 11) provide further detail of the locations of focus for the development of other uses.

***PQ15. Further to the above, could the Council confirm whether any areas were excluded from any area of search for allocations, such as areas with existing Neighbourhood Plans in place?***

#### Council's response

The consideration of land for potential allocation was comprehensive across the city. No additional allocations have been proposed within the three areas with existing Neighbourhood Plans in place although two sites have been carried forward from the adopted local plan within these areas (BSA1402 within Hengrove and Whitchurch Park NDP, and BSA0103 within Lawrence Weston NDP).

***PQ16. Could the Council confirm whether any allocations are within identified minerals safeguarding areas? If there are, could a list of relevant allocations be provided and an indication as to how minerals safeguarding was considered in the site selection process?***

#### Council's response

Minerals Safeguarding Areas are defined by the current local plan for land at south east Bristol alongside the A4 Bath Road (Policy UM3 'Minerals Safeguarding Areas'). These areas are related to the surface coal deposits identified in that location. The areas are currently defined as Minerals Safeguarding Areas in the Site Allocations and Development Management Policies Local Plan - Policy DM38 'Minerals Safeguarding Areas'.

None of the allocations within Policy DA1 'Proposed development allocations' (and Development Allocations Annex) are located within a Minerals Safeguarding Area.

Policy DS12 'New neighbourhood – Bath Road, Brislington' includes land which is within a Minerals Safeguarding Area. Policy UM3 'Minerals Safeguarding Areas' would be applicable to this site. It sets out criteria for the consideration of the surface

coal resource. There is no presumption that land within the minerals safeguarding areas will ultimately be allocated for extraction. It appears unlikely that prior extraction of coal would be practicable or environmentally acceptable at this location, or of economic value, and so no unnecessary sterilisation of surface coal reserves would arise. This will be examined as part of any planning application.

***PQ17. Document TPC001 refers to a review of allocations in the existing local plan and removal of certain sites. Where in the evidence base is the outcome of these reviews set out (both where a site has been included as a proposed allocation or not) and could clarity be provided on how and when the reviews took place?***

#### Council's response

Existing allocations were proposed to be brought across from the current local plan to contribute to the supply of land for new homes and the continued delivery of development in the regulation 18 stage Local Plan Review Consultation February 2018 (PDC001). The Bristol Local Plan Review Policies and Development Allocations Consultation March 2019 (PCD002) proposed that development site allocations from the existing local plan which had not yet been developed should be retained in the new local plan, with those having made significant progress towards delivery removed. This process was undertaken alongside Bristol Local Plan Review Annex – Draft Development Allocations Consultation 2019 (PCD002a) and Bristol Local Plan Annex – Development Allocations – Publication Version November 2023 (CSD002).

This approach was reiterated in the Bristol Local Plan Review Draft Policies and Development Allocations Further Consultation November 2022 (PCD003), with the exception of two locations where a change was considered necessary to reflect the greater priority for biodiversity required in response to the declaration of the ecological emergency by Bristol's One City partners (the council and various city stakeholder bodies) in 2020.

#### *Land around Novers Hill – the Western Slopes*

The current local plan allocates various sites for residential, business use, and industry and warehousing in the Novers Hill area, reflecting the Knowle West Regeneration Framework (EXA014) which was approved in 2012.

In response to the ecological emergency, it was considered that the nature conservation interest of the sites which are site of nature conservation interest was of overriding concern. It was proposed that, with the exception of some brownfield land, those areas were no longer allocated sites and were retained as open space with nature conservation interest. The council as the landowner of much of the land had already signalled its intention that its land should not be developed.

Three of these development site allocations were therefore proposed to be discontinued, with the exception of some brownfield land, and not retained in the local plan: BSA1114 Land at Novers Hill, adjacent to industrial units; and BSA1119 Land to east of Hartcliffe Way, south of the Waste Depot were therefore discontinued; and BSA1108 Land at Novers Hill, east of Hartcliffe Way and west of

Novers Lane/ Novers Hill BSA1108 was reduced in size to include only a section of brownfield land and is now identified as *previously developed land at Novers Lane, east of Hartcliffe Way and west of Novers Lane BSA1108A*. The remaining areas at Novers Hill are proposed for designation as Local Green Space and the site of nature conservation designation shown on the policies map.

#### *Brislington Meadows*

This land also has city wide importance for nature conservation; a site of nature conservation interest. In the adopted Site Allocation and Development Management Policies Local Plan July 2014 a part of the meadows area is allocated for housing development subject to providing compensation and mitigation for the loss of habitat which would arise from development: BSA1201 Land at Broomhill, Brislington. Since that allocation was made in the adopted local plan, an ecological emergency has been declared by One City partners and it was considered that it would be more appropriate for the existing site allocation to be discontinued and for the site to be retained as open space with nature conservation interest. This development site allocation was therefore proposed to be discontinued and not retained as set out in the Bristol Local Plan Further Consultation in November 2022 (PCD003).

Since this time outline planning permission for 260 homes on the site has been granted on appeal (planning application reference 22/01878/P – decision dated 17 Apr 2023). This permission is annotated for information on the publication version of the policies map where the site is proposed for designation as reserved open green space and shown as a site of nature conservation interest.

***PQ18. Appendix C of TCP001 [understood to be the SHLAA report (EVEH01)] includes sites that were promoted at Regulation 19 stage. Can the Council confirm whether or not those sites have been assessed using the same criteria as the allocations? Can the Council also confirm whether non-residential sites were proposed at the same stage and whether these have been assessed on this basis?***

#### Council's response

Appendix C of the SHLAA assesses the 13 sites submitted at the regulation 19 stage for their constraints and development potential with reference to standard density assumptions, in a manner comparable to the development allocation process.

The potential future development of these 13 sites is not ruled out by the local plan. They are not subject to designations which would preclude some form of residential development.

All sites promoted at Regulation 19 proposed an element of residential development, although several of the sites were promoted for mixed use development.

***PQ19. In addition, we ask that the Council provide us with a map, or maps, overlaying all the proposed allocations on a ward base map (including those not listed under Policy DA1). The allocation references and wards should be***

**clearly referenced. The map(s) should also include any relevant boundaries for any areas covered under policies DS1-DS14.**

Council's response

The requested information has been provided as a map booklet by ward (pdf).

***The conclusion to document EVET01 states that the transport model is currently subject to its run process and that a detailed report will be issued shortly.***

***PQ20. Could the Council clarify what transport modelling work is currently being carried out? If there is work in progress, does the Council expect to submit it to the examination and, if so, when is it expected to be available?***

Council's response

AtkinsRéalis has completed the local plan modelling work using the West of England Transport Model (WERTM). This includes the West of England Combined Authority (WECA) region development targets identified in the emerging local plans and therefore, considers the cumulative effects on the transport network.

For the Bristol City Council administrative area, the model shows that the strategic road network was at capacity in 2019 and now, post-covid, is largely back to that status. The WERTM was run with a worst-case scenario of no investment in the road network and full development delivered by 2042.

The WERTM report (Local Plan Modelling Outputs Report July 2024) is now available, has been provided with this response and can be added to the examination library.

### ***Development Strategy and Policies***

***This chapter sets out the development strategy and identifies areas of growth and regeneration.***

### ***General Questions on the Development Strategy Chapter***

***PQ21. Could the Council explain the purpose of the reference to 2050 in paragraph 3.2? How does this relate to the plan period and the development strategy?***

Council's response

The sentence flows from a passing reference to 2050 in the vision section at paragraph 2.4 where the vision attempts to look beyond the formal end of the plan period. The sentence in 3.2 talks of setting the tone for continued delivery making the assumption that development will continue beyond 2040. The shared '[One City Plan](#)', which is not a development plan document, refers to 2050 and so it is a reference to which local stakeholders are familiar.

2040 is the formal end of the plan period.

***PQ22. Could the Council explain how the areas of growth and regeneration were identified?***

Council's response

The areas identified by the development strategy policies represent areas of opportunity for urban regeneration consistent with the objectives of the NPPF (September 2023). They arise from:

- a combination of continuation or extension of existing local plan policy (policies DS1, DS1A, DS2, DS4-5 in part);
- a reflection of wider regeneration initiatives (policies DS3-5, DS8, DS13-14); and
- areas drawn from the urban potential assessment (policies DS6-7, DS9).

Further information is set out in Appendix A of the SHLAA report (EVEH01).

Policies DS11 and DS12 are proposed amendments to the Green Belt to meet housing development needs.

***PQ23. Are the figures expressed for development capacity in the reasoned justification to relevant 'DS' policies meant to be a target or requirement for each of the areas? In addition, how have these capacities been identified?***

Council's response

The figures are not a target or requirement. They represent an estimate for each area which the policy facilitates. The policy is intended to enable the level of development suggested by the estimate.

Where possible this estimate is derived from masterplans and development frameworks being prepared for each area. In other cases they are capacity-based figures based on the best available information such as the urban potential assessment. Further information is set out in Appendix A of the SHLAA report (EVEH01).

***PQ24. Where minimum densities are set out in the reasoned justification, is it intended these should be treated as policy (as seems to be suggested by Policy UL2)?***

Council's response

Policy UL2 'Residential densities' states that the density sought in each location will reflect the amount of development proposed by the development strategy policies and any specific policy approaches in those areas. 'Specific policy approaches' may refer to any aspect of the development strategy policies that affects the mix and distribution of development, not just approaches directly related to density.

The references to minimum densities in the explanatory text to the development strategy policies DS7 'Central Fishponds', DS8 'Central Bedminster', DS9 'Brislington', DS13 'Lockleaze' and DS14 'Central Southmead' are not treated as policy. They support the references to the efficient use of land that are present in each of the policies and give an indication of the density that is likely to be necessary

to meet the regeneration objectives of the development strategy policy, including any aspiration on the number of homes as also set out in the explanatory text.

***PQ25. What is the purpose and intended status of the blue text boxes under paragraphs 3.1.2, 3.2.3, 3.3.4 and 3.4.3?***

Council's response

The text boxes provide the reader with a general overview of the development strategy within four broad areas of the city.

***PQ26. Further to the above, each text box refers to there being “scope for increased growth where further interventions and delivery of infrastructure can unlock more potential”. Could the Council clarify what this means in terms of the development capacities identified for each of the relevant ‘DS’ policies and/or overall supply figures? For example, do the stated capacities, and overall housing supply, take account of this additional potential? If not, has the Council identified the constraints that exist and what interventions and infrastructure delivery would be required to “unlock” this potential and what additional level of housing could be delivered as a result?***

Council's response

The statements have no specific policy role but reasonably reflect the fact that increased growth is plausible through further intervention and where supported by services and infrastructure. They are reflective of the ambitious intent of the plan in terms of housing reflected in policy H1 and elsewhere.

The local plan housing requirement in policy H1 is not capped and there is an aim for the requirement to be exceeded. Constraints and ‘unlocking’ interventions which would directly release new developments are not identified but additional capacity can be facilitated through focused regeneration work.

For DS1A 'Broadmead, Castle Park and the Old City', DS2 'Bristol Temple Quarter', DS5 'Frome Gateway', DS8 'Central Bedminster', DS13 'Lockleaze' and DS14 'Central Southmead' development capacity has already emerged from masterplans / regeneration frameworks or other regeneration projects affecting these areas. The capacity estimates are based on this but are not capped, and development over the estimate could still be supported within the context of the policies.

For areas where a masterplan / regeneration framework has yet to be prepared, such as DS6 'Lawrence Hill', DS7 'Central Fishponds' and DS9 'Brislington', the comprehensive approach offered by a masterplan / regeneration framework (supported by a process of site assembly) has the potential to increase the capacity beyond that specified in the local plan:

- In the case of Brislington, para.3.3.14 suggests that an additional 450 homes could be facilitated this way.
- In the case of Lawrence Hill, there is the potential for additional development land to be released via changes to road infrastructure (the reconfiguration of Lawrence Hill roundabout) (see response to PQ43).

For DS3 'St. Philip's Marsh', the local plan identifies no specific capacity or housing target beyond the 'thousands' of new homes referred to in the development policy. The combined Temple Quarter and St Philip's Marsh area (Policies DS2-3) is one of the UK's largest regeneration projects. The overall intention for housing delivery is 10,000 homes in the next 25 years. This is stated in the regeneration project's vision statement [Vision – Bristol Temple Quarter](#). As set out in the SHLAA report (EVEH01), 4,000 homes in the DS3 area are expected within the plan period to 2040.

For DS4 'Western Harbour', the local plan identifies no specific capacity or housing target beyond the reference to new homes referred to in the policy. Permissions have been granted to date for around 320 homes on the Baltic Wharf and Payne's Shipyard sites. Further development will depend on the outcome of the current master planning exercise and delivery will be associated with a resolution of flood risk matters as part of the River Avon Flood Risk Strategy as referred to in the policy (see also Policy FR2 'Bristol Avon Flood Strategy').

***PQ27. There do not appear to be any specific allocations within areas of growth and regeneration identified under policies DS1A, DS2, DS3, DS4, DS5, DS6, DS7, DS8, DS9, DS13 or DS14. Is this correct? If so, what is the reason for this, particularly given the reference to development capacities in the reasoned justification?***

Council's response

This is correct. The development strategy areas do not contain specific site allocations as they apply policy to a wider area. The approach of broad area policy is used in the existing local plan: Bristol Central Area Plan policy BCAP35 'Bristol Temple Quarter' (DPD003).

Further information on the development capacity of each area is set out in Appendix A of the SHLAA report (EVEH01).

***PQ28. The 'Place principles' for several policies refer to comprehensive or co-ordinated forms of development. What information would be required to demonstrate that opportunities relating to this have been sought?***

Council's response

The approach overall takes forward a similar policy in the existing local plan (Site Allocations and Development Management Policies policy DM27 'Layout and Form' (DPD002), Bristol Central Area Plan policy BCAP34 'Coordinating major development in Bristol City Centre' (DPD003)) and also reflects the new Bristol Local Plan policy DPM1 'Delivering well-designed, inclusive places'.

The response to the policy requirement would be set out in the Design and Access Statement accompanying the application (as per policy DPM1). In many cases comprehensive or co-ordinated forms of development will be guided by masterplans or development frameworks as set out in the development strategy policies.

***PQ29. The Development Strategy chapter refers to three Neighbourhood Development Plans; Old Market Quarter, Hengrove and Knowle West and Lawrence Weston. Could the Council explain the purpose of these sections***

***and how they contribute to the spatial strategy and/or decision-making process?***

Council's response

The sections provide contextual information to offer a complete a narrative as possible within the Development Strategy chapter. The made neighbourhood plans (Old Market; Lawrence Weston; and Hengrove and Whitchurch Park) (EXA005, EXA007, EXA006) are part of the development plan and it is considered appropriate and helpful for the local plan to refer to them. The relevant sections in the local plan are not policies. The diagram on page 3 shows how policies are structured.

Paragraph 3.3.21 is included to provide information. It refers to major permissions at Hengrove Park and at Hartcliffe Campus – they account for about 1,400 and 300 homes respectively. These were part of the current local plan. Core Strategy Policy BCS1 'South Bristol' (DPD001) refers to Knowle West and Hengrove Park as a focus for regeneration within South Bristol and there are relevant site allocations.

Knowle West is not a neighbourhood plan. The Knowle West Regeneration Framework (EXA014) is a regeneration project dating from 2010 and referred to in the Core Strategy (DPD001). It is referenced on the council's web site. It resulted in several development site allocations within the current local plan. The project continues but many of the allocation and projects have been completed or started. Some allocations have been taken forward to the Bristol Local Plan. Paragraph 3.3.22 is intended to provide information.

***Central Bristol***

***PQ30. Paragraph 3.1.1 and policy DS1 refer to the City Centre's regional focus. Where in the Plan is the explanation for why the City is of regional importance?***

Council's response

This reference to regional focus carries forward the approach from the existing local plan (Core Strategy policy BCS2 'Bristol City Centre') (DPD001), which identifies Bristol City Centre's role as a regional focus. The city centre, which forms the core of the largest city in the region, continues to be a focus of regional importance. Paragraphs 3.1.3-3.1.9 of the new Bristol Local Plan describe the features which contribute to this role.

***PQ31. The Floating Harbour is included within policy DS1 but is not then referred to in any of the other Development Strategy policies as all the other areas are, what is the reason for this?***

Council's response

The Floating Harbour is referred to in policy DS1 'Bristol City Centre' because the Floating Harbour is located in its entirety within that policy area. It is also referenced in DS1A 'Bristol City Centre – Broadmead, Castle Park and the Old City' where a small section of the Floating Harbour is adjacent to the policy area. Contextual text for policy DS4 'Western Harbour' identifies the Western Harbour area as an extension to the Floating Harbour.

Elsewhere references are more geographically specific (for example, references to Totterdown Basin, which is part of the Floating Harbour, in policy DS2 'Bristol Temple Quarter').

Otherwise, further general references in other development strategy policies are not required for the purposes of those policies.

**PQ32. Policy DS1A expects major development to provide a minimum of 10% of ground floor space for community or cultural use. On what basis was this percentage figure derived?**

Council's response

The City Centre Development and Delivery Plan (DDP) Part A, November 2023 (EXA008), sets out that the council have a strategy to secure 10% of ground floor community and cultural uses with affordable rents in new developments. This is found on page 42, where the DDP states:

*'Identifying and negotiating provision for new, purpose-built community and cultural spaces delivered through new development, with a strategy to secure 10% of new ground floor development for community and cultural use, with affordable rents, protected in perpetuity.'*

The 10% figure in the DDP was informed by soft market testing on live planning applications. The DDP has been through the Council's consultation process. This is considered an appropriate and proportion for Policy DS1A 'Bristol City Centre – Broadmead, Castle Park and the Old City'.

A suggested modification to paragraph 7 of the policy text has been added to the Schedule of Suggested Main Modifications (EXA002) to clarify that a proportion of ground floor space will be sought with the specific proportion referred to in additional explanatory text. These modifications are shown below:

Policy DS1A, policy text, 7<sup>th</sup> paragraph:

~~Major development will be expected to contribute to inclusive uses and activities by providing a minimum of 10%~~ Where major development is proposed the council will seek a proportion of ground floor space suitably fitted out for the use of community and/or cultural organisations and groups and made available at an affordable rent.

Policy DS1A, paragraph 3.1.19:

~~The detailed approach to space for community and cultural uses is~~ Where ground floor space for community and cultural uses is sought in accordance with this policy, the aim will be for the proportion to be 10% of the overall space as set out in the City Centre Development and Delivery Plan.

**PQ33. Could the Council explain what is meant by freight consolidation in the transport section of policy DS2 and how it is anticipated development would make provision for it?**

Council's response

A definition for freight consolidation can be found at [travelwest.info](http://travelwest.info):

*‘Freight consolidation is where many suppliers have goods delivered directly to a place (consolidation centre or delivery hub) where it is stored and then when needed is combined into a single fuller load for the onward journey, for example into the city centre.’*

Freight consideration is among the transport improvements that will be provided as part of the wider Bristol Temple Quarter development.

***PQ34. In policy DS3 under the section relating to North west St Philip’s Marsh, what is meant by ‘enhanced connections to Bristol Temple Quarter and the city centre as a whole’?***

Council’s response

Bristol Temple Quarter is part of Bristol City Centre but it also lies between St Philip’s Marsh and the rest of the city centre. The reference is to seeing the wider connections from Bristol Temple Quarter as a city gateway centred on the station.

A new station access is currently being completed on the east side of Bristol Temple Meads station. This access will provide connections from St Philip’s Marsh to Bristol Temple Quarter and therefore on to the wider city centre. Another example is the walkway around the river from Totterdown Basin to Temple Quarter which is currently under construction.

The Bristol Temple Quarter Regeneration Programme led by the newly formed BTQ LLP covers St Philip’s Marsh. Regeneration of the area will be guided by the adopted Development Framework (EXA009) and the emerging Temple Quarter Masterplan. Using fully approved MHCLG funding, the LLP will deliver two new and two improved entrances alongside two new multimodal transport interchanges including significant bus and cycle provision to the north and south of Bristol Temple Meads Station, by March 2028. Improved pedestrian and cycle connectivity between the station, city centre and St Philips Marsh will be delivered through development contributions and a future business case for enabling infrastructure, along with new bus routes to deliver public transport access into and through the area.

***PQ35. Policy DS3 refers to ‘maker-spaces’ in the section relating to North east St Philip’s Marsh. What are these?***

Council’s response

Maker-spaces are workspaces which might provide shared resources for businesses as well as opportunities to collaboration and co-creation. They would typically be associated with smaller and start-up businesses.

In this context, maker-spaces as collaborative workspace geared towards smaller scale business and industrial uses. These might be in standalone commercial buildings or co-located in buildings with other uses. They are targeted at accommodating collaborative / collective making activities, open access workshops, small to medium scale making and small-scale product development.

**PQ36. Paragraph 3.3.31 of policy DS3 refers to enhancement of development values across the area. Is this evidenced in the Viability Assessment?**

Council's response

This matter is not referred to directly in the Viability Assessment. Development values have already been enhanced as evidenced by the significant schemes nearing completion including numerous office and residential developments in the Redcliffe and Temple Quay area, and purpose built student accommodation close to the new University of Bristol Enterprise Campus and in St Philip's Marsh. This process will continue with the opening of the UoB Campus and completion of the new Eastern Entrance in autumn 2026, and the new station entrances and transport interchange by March 2028. These increasing values will support contributions towards infrastructure.

**PQ37. Policy DS4 refers to a reconfigured road system in the first bullet point. Could the Council provide detail on how this would be provided, any timescales and how it would be funded?**

Council's response

The regeneration project is described on the council's [web site](#), which notes:

*'We need to update or replace the Cumberland Basin road system, an important local and regional transport route.*

*'As the infrastructure of this road has become older, maintenance is more expensive. We'll need to renew or replace large parts of the system in future. The Western Harbour project is an opportunity to make wider improvements to the area at the same time.'*

Further information is included on the project web site:

[What's on the horizon for Bristol's Western Harbour? \(harbourhopes.co.uk\)](http://harbourhopes.co.uk)

For information, the largest part of the policy area is within the ownership of Bristol City Council and is subject to the masterplanning process as described on the web site. Parts of the Western Harbour policy area have already seen the granting of planning permission at Baltic Wharf (21/01331/F, 166 homes) and Paynes Shipyard (19/06107/F, 154 homes).

At this point, available information on provision, timescales and funding of a reconfigured road system could be provided, however it would be helpful to have more specific questions regarding the information needed to provide a targeted response.

**PQ38. Paragraph 3.1.38 of the explanation to policy DS4 refers to Baltic Wharf and Payne's Shipyard which are not within the area but could be developed in accordance with the policy. Is there scope for including these areas within the policy or if not, how would a decision maker be able to apply the policy?**

Council's response

Baltic Wharf and Paynes Shipyard are included within the DS4 'Western Harbour' policy area at its eastern and southeastern most sections (diagram after paragraph

3.1.36, where it is labelled Cumberland Road and Coronation Road). They lie beyond the area of the masterplan, which focuses on the largest part of the policy area which is owned by the council. As indicated in response to PQ37 above, permissions have been granted on these sites.

***PQ39. The introduction to policy DS5 at paragraph 3.1.39 refers to this being the first point of arrival for many visitors, could the Council clarify what is meant by this?***

Council's response

The text is a general reference to the fact that the policy area adjoins the point at which visitors arriving via the M32 enter Bristol City Centre. It is this which gives the regeneration area its name of Frome Gateway. The regeneration framework agreed for the area uses similar language, describing it as a city entrance or gateway entrance from the M32: Frome Gateway Spatial Regeneration Framework - January 2024 pages 1, 68, 84 (EXA011).

***PQ40. Policy DS5 refers to logistics development. What is the anticipated scale of this provision at Junction 3 of the M32?***

Council's response

The reference reflects proposals for logistics provision on a site adjacent to Junction 3 as set out in the Frome Gateway Spatial Regeneration Framework (EXA011).

***PQ41. The explanatory text of policy DS5 at paragraph 3.1.44 refers to accessible and adaptable homes. What evidence of need is there to support this requirement?***

Council's response

The need for accessible and adaptable homes has been raised by stakeholders during consultation feedback on the Frome Gateway Spatial Regeneration Framework (EXA011). Paragraph 3.1.44 cross-refers to policy H9 'Accessible homes'.

### ***East Bristol***

***PQ42. Policy DS6 and paragraph 3.2.10 contain references to the bus depot on Easton Road. What does the Council anticipate will be the evidence necessary to demonstrate that the facility would no longer be needed?***

Council's response

The policy emphasis is on the retention of the depot, which is not expected to come forward for redevelopment within the plan period. Evidence for it being no longer required would be confirmation from the bus operators (and other relevant stakeholders) that they did not require the depot in order to provide bus services for the local network.

***PQ43. Policy DS6 contain reference to the reconfiguration of the Lawrence Hill Roundabout. However, the accompanying explanation is not entirely clear in respect of what this would entail. Could the Council provide further detail on what they anticipate would happen at this location and how a decision maker should react to any such proposals?***

Council's response

It is not currently anticipated that the reconfiguration would come forward within the plan period, as reflected in the SHLAA (EVEH01).

Reconfiguration which might be contemplated would be removal of the roundabout with a more space efficient junction such as the approach that has recently been undertaken in Bristol at the former Temple Circus gyratory (A4044 Temple Way/Temple Gate). Such a change would be likely to result in the provision of land for development such as has occurred at Temple Circus.

***South Bristol***

***PQ44. At paragraphs 3.3.21 and 3.3.22, reference is made to a planning permission for major development at Hengrove Park and Hartcliffe Campus and the Knowle West Regeneration Framework respectively. Could the Council explain the purpose of including these references and how they contribute to the development strategy and/or decision-making process? With reference to the Knowle West Regeneration Framework, why is there no specific policy relating to this area?***

Council's response

Please see also answer to PQ29.

Knowle West Regeneration Framework (EXA014) is a longstanding regeneration area where much has been completed so it was not identified as a new regeneration requiring a specific policy area approach.

***PQ45. Policy DS11 does not include development requirements for Land at Ashton Vale ('Longmoor Village'). On what basis would decision makers assess planning applications within this area?***

Council's response

Land at Ashton Vale (Longmoor Village) now has planning permission for residential development of up to 510 homes (ref. 21/03166/P – permission dated 22 August 2023).

On the basis of the permission development requirements are not considered to be necessary but the amendment to the Green Belt boundary is required to reflect and confirm the changed circumstances and to confirm the intention of Green Belt boundary change.

***PQ46. Paragraph 3.3.30 refers to land in the emerging North Somerset local plan in relation to Elsbert Drive. Could the Council provide more information and clarity about what is proposed in the emerging North Somerset Local Plan,***

***what stage this plan is at and the status it has, how the land at Colliters Way affects the Elsbert Drive allocation and how the Council would expect a comprehensive approach to development to be achieved?***

Council's response

Please see also answer to PQ1.

The North Somerset Local Plan 2039 Pre-submission Plan (Reg 19) November 2023 proposed that land north of Colliter's Way, Long Ashton is allocated for residential development (215 homes) with a site requirement 'to coordinate development with land in Bristol City'. The land proposed to be allocated lies east of Colliter's Way and up to the edge of the Bristol urban area, sharing a boundary with the site at Elsbert Drive.

Policy DS11 'Development allocations – south west Bristol' refers to a detailed cross boundary development framework or master plan. The explanatory text (3.3.30) indicates that the council will engage with North Somerset Council to ensure a comprehensive approach to development.

***PQ47. Does the issue of comprehensive development between the Colliters Way and Elsbert Drive sites constitute a cross-boundary strategic matter that has been considered through the Duty to Cooperate? If so, could the Council ensure that its answer to PQ1 sets out how this issue has been addressed?***

Council's response

Please see answer to PQ1.

***In relation to Policy DS12, paragraph 3.3.34 refers to a capacity of between 500 and 750 homes. This appears to be dependent on the relocation of the Brislington Park and Ride to land near Hicks Gate Roundabout within Bath and Northeast Somerset.***

***PQ48. Could the Council provide clarity about this issue? For example, whether the relocation is a firm or committed proposal, whether it is identified in the relevant local plan, what process(es) would be needed to deliver this proposal, what are the anticipated timescales for delivery, what assumptions have been made about the area in the overall housing supply and, if the relocation were to not happen, what implications this has for the policy?***

Council's response

The higher end of the capacity estimate range, about 750 homes, would depend on the redevelopment of the current park and ride site. If the park and ride site does not become available the development opportunity would be smaller as indicated in paragraph 3.3.34 – about 500 homes. One of the site promoters, Bellway Homes, has recently submitted a planning application for development of around 500 homes on land to the east of the park and ride site.

Housing delivery estimates assume the higher level of the capacity estimates, that is with the park and ride facility becoming available. That is on the assumption that the park and ride would be made available and developed by 2040. If this is not the

case, this would be an over-estimate for this location. As discussed elsewhere headroom for non-delivery has been built into housing requirement assumptions.

The potential relocation of the existing park and ride site to a location near the A4 Hicks Gate roundabout is explored in the Key Issues and Opportunities in the emerging Bath and North East Somerset Council Local Plan [Local Plan 2022 – 2042 - Options Document \(bathnes.gov.uk\)](#) page 131:

*‘As part of comprehensive development there is potential for the Brislington Park and Ride facility in Bristol to be relocated to land within Bath and North East Somerset closer to the Hicks Gate roundabout and in so doing becoming a transport interchange. This would mean that in-bound traffic using the park and ride would not pass through the proposed development area.*

*• The delivery of a transport interchange at Hicks Gate offers the potential to provide a broader range of sustainable connections with surrounding communities, including Keynsham and Bristol’s East Fringe. This could include additional bus services, active travel connections, and shared mobility facilities such as E-car clubs, hire bikes and e-scooters. It also would provide access to bus services on the Bristol Bath Strategic Corridor (BBSC), which will benefit from journey time improvements provided by the BBSC project.’*

The potential relocation of the Brislington Park & Ride is also referenced in Joint Local Transport Plan 4 2020-2036 (p.179) (REL003).

Bristol City Council is the owner of the existing park and ride site.

#### *Planning application information*

A planning application was submitted on 21<sup>st</sup> August by Bellway Strategic Land for part of the Policy DS12 ‘New neighbourhood – Bath Road, Brislington’ area: reference 24/03186/P. The application is for outline planning permission with some matters reserved for up to 555 residential dwellings, a local centre including up to 1,000 m<sup>2</sup> gross floor area comprising Use Classes E and F2, green infrastructure including sustainable drainage, ecological habitats, network of footpaths and cycle paths, childrens play areas and amenity green space, site access works and associated infrastructure - approval sought for Access with all other matters reserved.

The submitted application excludes the park and ride site and the smaller partly brownfield site to the east of the allotments which is in a separate ownership.

***PQ49. Further to the above, is the park and ride relocation a cross-boundary strategic matter that has been considered through the Duty to Cooperate? If so, could the Council ensure that its answer to PQ1 sets out how this issue has been addressed?***

#### Council’s response

The overall matter of a cross boundary development location at the Brislington area is considered as a strategic matter as referenced in paragraph 3.34 of the joint statement of common ground (PAL006).

## **North Bristol**

**PQ50. What is the status of the Southmead Community Plan, as referred to in paragraph 3.4.12?**

### Council's response

The Southmead Community Plan (EXA015) has been led by the local community. Further information is available on the Southmead Development Trust [web site](#). The land in the policy area is principally in the ownership of Bristol City Council.

For information, Southmead Development Trust has obtained planning permission for a mixed-use development on land owned by Bristol City Council at Glencoyne Square, which is at the heart of the policy DS14 'Central Southmead' area. Planning permission was initially granted in 2021 and a revised application was permitted on 25 July 2024 for up to 187 residential units and other uses.

## **Green Belt**

**The Plan identifies three areas that would be removed from the existing Green Belt. Paragraph 140 of the NPPF requires strategic policies to identify a need for any changes to the Green Belt.**

**PQ51. Does the Plan satisfy the requirements of paragraph 140 of the NPPF? Could the Council clarify what the exceptional circumstances are at a strategic level for altering Green Belt boundaries?**

### Council's response

The plan is consistent with national planning policy as expressed in NPPF September 2023 paragraph 140. [It is noted that this paragraph is subject of proposed amendments in the proposed revisions to the NPPF of July 2024.]. Policies DS10-12 of the new local plan address the Green Belt and changes to its boundaries in exceptional circumstances. These are identified as strategic policies in Appendix A of the new Bristol Local Plan.

The need for homes is explored in paragraphs 6.1 to 6.8 of the local plan. In order to ensure a sufficient number and range of development sites become available to meet the need for new homes, the local plan indicates that it is considered necessary to allow for a limited release of land from the Green Belt (paragraph 3.3.31). The need to bridge the gap between housing need and capacity to deliver housing constitutes the exceptional circumstances in this case. The authority cannot meet sufficient of its identified need for new homes by any other means.

The West of England Combined Authority Strategic Green Belt Assessment September 2022 (EVEG01) provides an assessment of the Green Belt having regard to its purposes. The assessment assists in providing an understanding of the impact of the proposed changes.

**PQ52. If there are exceptional circumstances to justify going into the Green Belt, then could the Council clarify what evidence has been used to determine how much and where Green Belt release is proposed?**

### Council's response

There is a very limited area of Green Belt in Bristol when compared to the extent of the Bristol Bath Green Belt overall; about 600 hectares in total located at the south

east, south, south western edges of the city and a small area beside the M32 motorway. Once it is accepted that it would be appropriate to release land, exceptionally, from the Green Belt in order to contribute to meeting housing need, there are in practice very few locations where that might be feasible or appropriate. The areas identified for release comprise those feasible and appropriate locations.

The areas proposed to be released for development would enable around 1,150 homes to be delivered. This represents around 2% of the projected need for new homes in the city by 2040 as calculated using the standard method (current version).

It is noted that Policy BCS5 'Housing Provision' of the Bristol Core Strategy 2011 (DPD001) contained a provision for use of some Green Belt land including south east Bristol as a long term contingency for development of new homes if land was required to accommodate higher levels of housing provision. The south east Bristol location is shown on the Core Strategy Key Diagram (page 156). Paragraph 4.5.22 of the Core Strategy went on to refer to there also being potential for new homes on: '*smaller sites in the Green Belt in south west Bristol*'. The proposals for Green Belt changes in the new Bristol Local Plan coincide with those areas at south east and south west Bristol as broadly referred to in the adopted Core Strategy.

The West of England Combined Authority Strategic Green Belt Assessment September 2022 (EVEG01) provides an assessment of the Green Belt having regard to its purposes. The assessment assists in providing an understanding of the impact of the proposed changes.

***PQ53. How have the sites or areas proposed to be removed from the Green Belt been considered as part of the wider site selection process?***

Council's response

Please see the response to question PQ52. The sites are shown in the SHLAA report (EVEH01) alongside the other local plan development allocations.

***Paragraph 141 of the NPPF sets out that before concluding that exceptional circumstances exist to justify changes to the Green Belt boundaries, the strategic policy making authority should demonstrate that it has examined fully all other reasonable options for meeting the identified need for development. This paragraph sets out three criteria which must be considered and assessed through examination.***

***PQ54. Could the Council direct us to the evidence which demonstrates it has met the requirements of paragraph 141 of the NPPF? If this is also to be found in the answers to other questions, there is no need to repeat the response; a cross-reference will suffice.***

Council's response

Please see the response to question PQ52 and the responses to questions regarding housing land supply.

***Amongst other things, paragraph 142 states that, where it has concluded that it is necessary to release Green Belt land for development, plans should give***

***first consideration to land which has been previously developed and/or well served by public transport. It goes on to state that plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt.***

***PQ55. Could the Council direct us to the evidence which demonstrates first consideration was given to previously developed land and/or that which is well served by public transport?***

Council's response

Please see the response to question PQ52.

There is very little previously developed land in the Green Belt in Bristol and such that there is either incorporated into proposed Green Belt releases or would be available for development in any case under Green Belt policy.

All the sites proposed for Green Belt release are able to be connected via public transport, being well located in proximity to the urban area and strategic routes (A4 corridor at Bath Road, Brislington and A38 corridor at Elsbert Drive). One of the proposed releases – Ashton Vale - has planning permission. It is located on the edge of the urban area and on the MetroBus M1 guided bus route which provides access to Bristol city centre and the Long Ashton Park and Ride site.

***PQ56. Does the Plan identify compensatory improvements to the environmental quality and accessibility of the remaining Green Belt?***

Council's response

The Local Plan does not set out or propose compensatory improvements to the environmental quality and accessibility of the remaining Green Belt. As stated above, there is very little Green Belt land within the city's boundaries. Those areas of the Green Belt which the plan aims to retain are well managed and in good condition, including areas of public access (including the proposed Local Green Spaces discussed in PQ135 and areas with public footpath access). Instead, the policies for release of Green Belt focus resources upon on-site enhancements such as the linear park proposal at Scotland Bottom (Policy DS12 'New neighbourhood – Bath Road, Brislington').

***Viability Assessment and Policy IDC1***

***The Bristol Local Plan Viability Assessment (August 2023) refers to having assessed policies which were published as part of the Council's Regulation 18 consultation in 2019.***

***PQ57. Has the Viability Assessment been updated to reflect any costs implications of any new policies or changes to those policies that were assessed since then?***

Council's response

The policies with cost implications as set out in the submitted Bristol Local Plan Publication Version (November 2023) (CSD001) have been taken into account in the Bristol Local Plan Viability Assessment (August 2023) (EVEV01).

***PQ58. The Viability Assessment does not include all of the Development Strategy areas in the submission plan (DS1A, DS11, DS12, DS13 and DS14). Could the Council explain why these have not been assessed?***

Council's response

Consistent with national planning practice guidance ([Viability](#): paras. 003 and 004) the Bristol Local Plan Viability Assessment (August 2023) (EVEV01) uses a site typology approach to assess development viability across the city. Given the range of development scenarios tested through this approach the area wide appraisal results (set out in section 6 of the assessment) cover all likely development scenarios across all development strategy areas. Consistent with national planning practice guidance ([Viability](#): para. 003) further sample testing of some of the key development strategy areas was considered helpful to support the area wide assessment.

***PQ59. The policy wording of IDC1 indicates that development and infrastructure provision will be coordinated in relation to growth in the City. How do the Council anticipate this will work in practice?***

Council's response

The policy wording in IDC1 'Development contributions and CIL' (first paragraph) brings forward identical wording from the adopted Core Strategy Policy BCS11 'Infrastructure and Developer Contributions' which also indicated that development and infrastructure would be coordinated to ensure that growth is supported by the provision of infrastructure and so on.

In practice this will work in same manner as it has since the Core Strategy was adopted in 2011 but with evolving mechanisms and institutions of delivery. The Infrastructure Delivery Plan (EVEI01) explains what infrastructure is needed to support the planned growth in Bristol and how the infrastructure is to be delivered – who is responsible and how funded.

***PQ60. Could the Council explain how the Bristol Infrastructure Delivery Plan 2023 has informed the content of policy IDC1?***

Council's response

The IDP provides evidence of the infrastructure that is required to support planned development. It explains what infrastructure is needed to support the planned growth in Bristol and how the infrastructure is to be delivered – who is responsible and how funded.

**PQ61. Paragraph 4.4 of the explanatory text to policy IDC1 refers to a Planning Obligations SPD. What date was this adopted, and does it refer to policies within the current Local Plan?**

Council's response

The Planning Obligations Supplementary Planning Document (EXA023) was adopted on 27 October 2012 and took effect from 1 January 2013 upon the introduction of Community Infrastructure Levy in Bristol. The current SPD refers to policies in the Core Strategy (DPD001). The SPD will be updated for the adoption of the new Local Plan.

The existing SPD describes its purpose as:

*'Purpose of the SPD*

*This SPD sets out the City Council's approach to planning obligations when considering planning applications for development in Bristol. It complements and provides further guidance to the policy approach set out in the Core Strategy (Adopted June 2011) and will assist in securing both local and national objectives in respect of the provision of sustainable development across the City. The SPD will remain consistent and in conformity with emerging Development Plan Documents comprising Bristol's Local Plan.*

*The objective of the SPD is to provide clarity to developers, development management officers, stakeholders and local neighbourhoods regarding the basis on which planning obligations will be sought. It details the obligations that may be required from different types and quantum of development and sets out the basis on which the level of obligation will be calculated, where appropriate.'*

**Housing Land Requirement and Supply**

**Paragraph 74 of the Framework expects strategic policies to include a trajectory illustrating the expected rate of housing delivery over the plan period and for plans to set out the expected rate of delivery for specific sites. We have not identified any such trajectory in the Plan itself.**

**PQ62. We have noted the information set out in the Strategic Housing Land Availability Assessment (SHLAA)<sup>6</sup>. However, to assist in our preparation and subsequent discussions at hearings, we ask that the Council provide us with a detailed spreadsheet setting out how many dwellings each committed and allocated site is expected to deliver in each year of the plan period, and what any windfall allowance for each year is. This should look back to the start of the plan period and include data on completions. The spreadsheet should also include evidence to justify the delivery information it contains. Appendix 1 to this letter sets out the minimum information we expect to see in this schedule.**

Council's response

The requested site information has been provided as a spreadsheet.

The trajectory for citywide assumptions including windfall development is set out in the SHLAA report (EVEH01).

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<sup>6</sup> EVEH01 Strategic Housing Land Availability Assessment (April 2024)

**PQ63. Could the Council also provide a summary of the expected distribution of housing delivery across Central Bristol, East Bristol, South Bristol and North Bristol?**

Council's response

The requested information has been provided as a spreadsheet.

**Paragraph 61 of the NPPF states that strategic policies should be informed by a local housing need assessment, conducted using the standard method in national guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.**

**PQ64. Could the Council confirm what it considers the objectively assessed housing need for Bristol to be over the plan period?**

Council's response

As set out at paras.1.1-1.4 of the council's 'Housing need and supply topic paper' (TPC004) the objectively assessed housing need for Bristol over the plan period is determined by the standard method set out in national planning policy. It is a total of 3,380 per annum at 2023 (see note below\*).

The standard method figure comprises a locally derived need of 2,503 homes per annum and a 35% cities and urban centres uplift which brings the total to 3,380 per annum.

[\*It is noted that the recent consultation on changes to national planning policy (MHCLG 30 July 2024) proposes to change the national standard method. The consultation indicates that some current inputs to the national formula are no longer fit for purpose in reflecting current housing needs and that the 35% urban uplift element which is currently applicable to Bristol provides a poor basis for directing housing growth to larger urban areas (consultation document chapter 4 paragraphs 1 to 19). Under the proposed standard method, the objectively assessed need for Bristol arising from the national formula would be 3,057 homes per annum compared with 3,378 homes under the current method.]

**PQ65. Could the Council explain what the exceptional circumstances are for diverging from the standard methodology for calculating the objectively assessed housing need?**

Council's response

The council has not diverged from the standard method. The LHNA report (EVEH03) is based on the standard method (see also note below\*).

The 2022 ORS report appended to the council's 'Housing need and supply topic paper' (TPC004) explored an alternative calculation, the outcome of which broadly coincided with the locally derived element of the standard method. Both calculations of housing need exceed Bristol's identified capacity, and as such the housing requirement can only reach the level that it does in policy H1 'Delivery of new homes – Bristol's housing requirement' of the local plan, as discussed elsewhere.

[\*As noted in response to PQ64 above, the Government has already indicated that the current standard method is not fit for purpose in a number of respects (consultation document chapter 4 paragraphs 1 to 19). It is currently proposing to change the current standard method by replacing it with a revised one. Whilst it is understood that proposed transitional provisions for submitted local plans will link their examinations to earlier versions of the National Planning Policy Framework, it is assumed that the relevant standard method figure will not be fixed to a September 2023 calculation. Under the proposed revised approach the objectively assessed need for Bristol would change from 3,380 homes per annum to 3,057.]

***Document TCP004<sup>7</sup> suggests that the total housing supply capacity up to 2040 would be 39,798. The housing requirement set out in Policy H1 is 1,925 dwellings per year, which equates to 34,650 dwellings. The policy also states that this figure will be exceeded where this can be supported by service and infrastructure capacity.***

***PQ66. Could the Council explain how it decided on a “headroom” figure of 15% between the overall capacity identified (around 39,800) and the housing requirement (34,650)?***

Council’s response

The SHLAA (EVEH01) identifies potential capacity from a wide range of sources including those where there has been no planning application to date and/or where existing uses are still in operation. It is not possible to guarantee that every dwelling of the SHLAA capacity will come forward within the plan period.

The 15% buffer is a reasonable provision that builds in some protection against non-delivery, particularly for those sources of capacity that are less certain such as urban potential. At the same time, it suggests a potential for the local plan housing requirement to be exceeded under the right conditions.

In turn the housing requirement is appropriately ambitious, being the highest that Bristol has had to date.

***PQ67. In relation to the second part of the policy, is it the Council’s position that there is theoretical capacity to exceed the requirement of 1,925 dwellings per year but that there are service and infrastructure capacity issues which prevent this being delivered? If so, has the Council identified the constraints which exist (see also PQ26 in relation to the Development Strategy)?***

Council’s response

The plan is aspirational. The housing requirement is not capped; it is expressed as a minimum. The figure of 1,925 homes per year is considered to be the deliverable capacity, but the plan aspires to exceed that target if services and infrastructure permit. There is no specific infrastructure intervention identified which would enable a specified additional number of homes, but as set out in the responses to PQ26 there are circumstances where additional dwellings may be plausibly facilitated.

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<sup>7</sup> TCP004 Housing Need and Supply Topic Paper

**Paragraph 66 of the NPPF states that within any overall housing requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas.**

**PQ68. Does the Plan set out any requirement for designated neighbourhood areas as required by paragraph 66 of the NPPF?**

Council's response

The local plan does not set out any overall housing requirement for designated neighbourhood areas.

Bristol's three extant neighbourhood plans were 'made' prior to the publication of the emerging local plan. They, along with any development allocations contained therein, remain part of the development plan.

**Paragraph 69a of the NPPF states that planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than 1 hectare; unless it can be shown through the preparation of relevant plan policies that there are strong reasons why this 10% target cannot be achieved.**

**PQ69. Could the Council direct us to the evidence which demonstrates that at least 10% of the housing requirement is on sites no larger than 1 hectare or, if this is not the case, the evidence of why this is not achievable? If this is answered by any other question, then a cross-reference will suffice.**

Council's response

As set out in the SHLAA report (EVEH01), 3,600 homes of the total 34,650 housing requirement, i.e. more than 10%, are expected to be delivered by small site windfalls (development of 10 homes or less) which will generally comprise sites smaller than one hectare.

In relation to the site-specific capacity set out in the SHLAA, the information has been supplied as a spreadsheet. The spreadsheet sets out that a further 5,603 homes, i.e. over 16% of the housing requirement, are on sites smaller than 1 hectare.

**Affordable housing**

**The table under paragraph 6.21 and Diagram 6.1 of the Plan suggest that the 35% affordable homes may not be viable in all parts of the City.**

**PQ70. Could the Council explain the justification for the 35% affordable housing figure across the City and how this relates to the information in the table and diagram referred to above (and any other relevant evidence)?**

Council's response

The 35% affordable housing provision across the city is based on the total estimated level of affordable housing that could be delivered over the plan period as a percentage of the council's total housing requirement set out at policy H1 'Delivery of new homes – Bristol's housing requirement'. The estimated level of affordable

housing that could be delivered is around 12,000 homes. This is around 35% of Bristol's total housing requirement of 34,650 homes. The estimate includes affordable housing that could be viably delivered without public subsidy through private development and additional affordable homes that could be delivered with the help of public subsidy through registered providers.

Prior to the publication of the 35% expectation (set out in the Bristol Local Plan Publication Version) the council was expecting the city's affordable housing policy to be delivered through the West of England Joint Spatial Plan (JSP). Policy 3 of the JSP had identified a minimum target of 35% affordable housing. This policy had been subject to extensive consultation up to the plan's submission for examination in April 2018.

It should also be noted that the Local Housing Needs Assessment (EVEH03) identifies a level of affordable housing need that exceeds any amount that could be practicably delivered in the city.

In order to achieve the 35% provision private developers are first asked to maximise the provision of affordable housing delivered without public subsidy. The table under paragraph 6.1 identifies the likely percentages that could be achieved in particular areas of the city (identified in diagram 6.1). These percentages are informed by the council's viability assessment (EVEV01), actual percentages secured through s106 over the last 10 years, and existing local plan affordable housing policy. Two locations have percentages below the citywide requirement of 35% including Bristol City Centre which has a threshold percentage of 20% and all other areas of the city (other than Bristol North West) which has a percentage of 30%. In these locations the developer would be expected to work with the council to deliver the respective shortfalls through other mechanisms. Example mechanisms are set out at para. 6.25 of the explanatory text.

***PQ71. In addition, could the Council explain how the 'threshold approach' in the City Centre, as set out in the second bullet on page 70, relates to this overall requirement and how this would work in practice?***

Council's response

The viability assessment (EVEV01) has identified particular viability considerations for the delivery of affordable housing within Bristol City Centre. The policy therefore makes provision for an approach where developers can deliver a specified level of 20%, provided the developer agrees to commence development within 18 months of any permission being granted. An explanation of this approach is provided at para. 6.23 of the explanatory text. The developer would then be expected to work with the council to increase affordable housing delivery up to the 35% expectation through other mechanisms. Example mechanisms are set out at para. 6.25 of the explanatory text.

A 20% approach has been operational in Bristol since 2018 and is currently explained in the council's Affordable Housing Practice Note (EXA017). The approach is used in particular areas of the city to incentivise the delivery of affordable housing where site by site viability challenges have arisen. Developers active within Bristol, particularly central Bristol are familiar with the approach.

**PQ72. Could the Council explain the justification for expecting applicants to demonstrate the maximum proportion of affordable housing that can be delivered viably without public subsidy? Is it anticipated this would be required even where the minimum figure of 35% had been met?**

Council's response

The Local Housing Needs Assessment (EVEH03) demonstrates a high level of affordable housing need within the city. The level of need is around 22,700 affordable homes over the plan period compared to the city's total housing requirement of 34,650 homes. This level of need cannot realistically be met given the city's housing capacity and viability considerations, however, it does justify an expectation on private developers to maximise the proportion of affordable housing that can be delivered viably without public subsidy. This approach is consistent with national policy initiatives to increase affordable housing supply. It is not the intention of the policy to seek any more than 35% affordable housing from private development without public subsidy.

**Paragraph 6.24 refers to a "rolling review" of affordable housing percentages and that any revised percentages will be published in the Affordable Housing Practice Note. There are also similar references in relation to policies H8 and BTR1.**

**PQ73. Could the Council explain the justification for this approach, how it would work in practice and whether it would be consistent with the plan-led approach?**

Council's response

An ability to review the affordable housing percentages (set out at paras. 6.21 and 6.23) is considered necessary in order to capture any potential improvements in market circumstances over time. The approach is consistent with the policy requirement that development should always aim to deliver the maximum viable proportion of affordable housing without public subsidy. Whilst the 35% overall policy requirement will remain constant the percentages sought without public subsidy may have to be varied across the plan period to reflect market circumstances.

The National Planning Policy Framework (September 2023) appears to acknowledge at para. 58 that viability evidence underpinning plans can become out of date. Under the existing local plan the council has had to review and adjust policy percentages in certain locations as a pragmatic response to changing viability conditions. This has been implemented through the Affordable Housing Practice Note (EXA017). Under the new local plan, the council would continue to undertake such reviews including the commissioning of new viability assessments to ensure percentages remain up-to-date.

**Other Housing policies**

**Policy H5 – Self-build and community-led housing**

**PQ74. How have the specific sites listed in Policy H5 been identified? In responding, could the Council explain how they have differentiated between**

***sites specifically allocated for self-build, custom-build or community-led housing and those where 5% of homes must deliver such homes?***

Council's response

The aim of these sections of the policy is to support the delivery of self-build/custom-build housing and/or community-led housing. This is consistent with national policy which expects local plans to reflect the type of housing needed by different groups in the community including people wishing to commission or build their own homes (NPPF September 2023 - para. 62). Current national policy also expects local plans to support small sites to come forward for community-led development for housing and self-build and custom-build housing (NPPF December 2023 - para. 70).

The five sites identified mostly comprise of undeveloped land, including two sites on land proposed to be removed from the Green Belt, and are located in the outer urban area. The characteristics of these sites allow for easier provision of development plots for self-build, custom-build or community-led housing and are less likely to have complex development issues. The residential densities envisaged on these sites are likely to be lower than that of sites within the city centre or inner urban areas. For this reason the sites are generally more suitable for self-build, custom-build or community-led housing proposals which generally take the form of individual houses rather than higher density development such as flats. Overall, the sites provide the greatest level of opportunity to deliver self-build, custom-build or community-led housing to meet the city's need for this form of housing.

The sites that have been specifically allocated for self-build, custom-build or community-led housing are or have been subject to interest from community-led housing groups, and/or have particular site characteristics that can best be addressed through design and residential densities more usually associated with this form of housing. The Bridge Farm site is in community ownership with a planning permission (20/05973/F) and a pending application (23/00912/P) for 15 new dwellings. The College Road site is owned by Bristol City Council and has been subject to interest for community-led housing.

***PQ75. Further to the above, could the Council explain how the 5% requirement has been identified for the sites identified?***

Council's response

The level of 5% is considered a reasonable level of provision. The proportion is consistent with an existing policy in the development plan that expects the provision of self-build plots from residential development - see Policy H4 'Community Self-build', Lawrence Weston Neighbourhood Development Plan (EXA007). The 5% requirement also equates to the current level of need, as evidenced by the number of entries on the Bristol self-build register, as a proportion of Bristol's total housing requirement set out in policy H1 'Delivery of New Homes - Bristol's Housing Requirement'.

A modification is suggested to ensure the wording of the policy is consistent with others in the local plan (particularly DS12):

Policy H5, policy text, third paragraph.

At least 5% of homes ~~will~~ should be in the form of self-build/custom-build housing and/or...

***PQ76. Could the Council explain how the proportion of self-build/custom-build housing and/or community-led housing in areas of growth and regeneration would be determined? Could the Council explain how this would be determined?***

Council's response

The aim of this part of the policy is to support the delivery of self-build/custom-build housing and/or community-led housing. This is consistent with national policy which expects local plans to reflect the type of housing needed by different groups in the community including people wishing to commission or build their own homes (NPPF September 2023 - para. 62). Current national policy also expects local plans to support small sites to come forward for community-led development for housing and self-build and custom-build housing (NPPF December 2023 - para. 70).

The proportion of self-build/custom-build housing and/or community-led housing expected on sites within growth and regeneration areas has not been specified as this is likely to vary across growth and regeneration areas depending on location, individual site circumstances and other factors. Instead, the proportion on any one site would be determined having regard to issues including local demand for self-build, other local housing evidence, the size of the site, and the characteristics of the site including its suitability for different housing types. Some of these issues are set out at para. 6.50 of the explanatory text. Within growth and regeneration areas it is not expected that the proportion would exceed 5%. The council is planning to bring forward guidance on the delivery of this type of housing as part of larger development sites. This intention is set out at para. 6.48 of the explanatory text.

***PQ77. Could the Council explain how it has identified the areas listed under 'Community-led housing exception sites', in particular areas that are covered by policies E5, E6A and GI2?***

Council's response

The aim of this part of the policy is to increase the opportunity for community-led housing groups to acquire and develop sites to provide homes. This is consistent with national policy which expects local plans to reflect the type of housing needed by different groups in the community including people wishing to commission or build their own homes (NPPF September 2023 - para. 62). Current national policy also expects local plans to support small sites to come forward for community-led development for housing and self-build and custom-build housing (NPPF December 2023 - para. 70).

The policy identifies key types of site/land including redundant community facilities, employment land/sites and open space that would not normally be used or allocated for housing. Proposals for residential development coming forward on these types of site/land would normally be subject to the provisions of the relevant policies identified in the policy text (policies E5 'Industry and Distribution Areas', E6A 'New workspace within mixed use development' and GI2 'Reserved Open Green Space'). However, proposals for community-led housing on these types of site/land need only meet the requirements set out under the policy text and would not be subject to the full requirements of the relevant policy. These types of site/land have been selected as

they are less likely to be acquired for residential development by mainstream developers thereby increasing development opportunities for community-led housing groups.

***Policy H6 - Houses in multiple occupation and other shared housing***

***Policy H6 is intended to provide city wide criteria and also seeks to avoid a local imbalance for development relating to houses in multiple occupation and other shared housing.***

***PQ78. Part (i) Bullet (c) of Policy H6 refers to physical alterations of buildings or structures. What is meant by 'cumulative detrimental impact' and how will this be assessed?***

Council's response

This criterion has been replicated from existing policy DM2 'Residential Sub-divisions, shared and Specialist Housing' (DPD002). The criterion refers to the potential negative impact that an accumulation of alterations to buildings or structures to facilitate HMO use could have on the character and/or quality of an area over time. Such alterations could include extensions, other changes to the form of a building or structures and removal of garden areas. Continuous alterations to the scale, form, proportions and materials of buildings and structures that contribute to the character and quality of their locality could have a detrimental impact on the area. Assessments will need to take account of the extent and nature of existing alterations to buildings and structures and any impact this may have caused and whether any further alterations associated with a proposal would exacerbate this impact. This part of the policy should be implemented in conjunction with policy DC3 'Alterations to existing buildings'.

***PQ79. Policy H6 'Houses in multiple Occupation - avoiding a local imbalance' states that proposals for Houses in Multiple Occupation (HMO) will not be permitted where the development would result in any residential property or properties being located between two houses in multiple occupation. In addition, intensification of HMOs will not be permitted where any residential property is located between two HMOs. Can the Council explain what evidence there is to explain how these thresholds have been determined?***

Council's response

The policy identifies the 'sandwiching' of a residential property or properties by two HMOs, and situations where development would result in more than 10% of the dwelling stock of a defined area being occupied as HMOs as examples of a local imbalance of HMOs that would not be permitted. The approaches have been justified on the basis of qualitative evidence provided by local communities and elected members identifying harmful impacts associated with concentrations of HMOs, and, quantitative evidence on the number and distribution of HMOs in Bristol.

In the case of 'sandwiching' it is considered that particular impacts on individual households, including noise and disturbance, highway safety (as a result of increased levels of on-street parking) and issues relating to poor waste management, can be intensified by sandwiching situations even if few HMOs existing locally.

In the case of the 10% threshold this proportion represents a level of HMO concentration that is significantly higher than the overall citywide concentration indicating an imbalance. Communities with concentrations of HMO's at 10% and above have also experienced the greatest level of impacts associated with this form of development.

The 'sandwiching' and 10% threshold assessments are set out in the [Managing the development of houses in multiple occupation SPD](#). The document was brought forward to support existing local plan policy DM2 'Residential Sub-division, Shared and Specialist Housing' (DPD002) and was adopted in November 2020 (see response to PQ82 below). It was developed and shaped with the support of local communities affected by HMOs. Further detail on the general impacts of HMOs, how evidence has been collected and the extent of community engagement in shaping the assessment is set out in the following documents:

- [Managing the development of houses in multiple occupation Supplementary Planning Document Reg. 13 Version \(August 2020\) - Evidence Paper](#)
- [Managing the development of houses in multiple occupation Draft Supplementary Planning Document Reg. 13 Version \(August 2020\) - Consultation Statement](#)
- [Managing the development of houses in multiple occupation Draft Supplementary Planning Document Reg. 13 Version \(August 2020\) - Summary of Reg. 13 Representations](#)

The approach has been accepted and followed by inspectors when determining relevant appeals. A number of other local authorities also have similar approaches set out in policies or SPDs.

The HMO SPD and its related documents can be added to the examination library.

***PQ80. The 3<sup>rd</sup> and 4<sup>th</sup> paragraphs of the section dealing with 'Houses in multiple Occupation - avoiding a local imbalance' refers to 'defined areas'. How will these be defined and where will this be set out?***

Council's response

The area is defined in para. 6.63, bullet two of the explanatory text as follows:

'more than 10% of the total dwelling stock is occupied as HMOs within approximately 100 metres of the site (including the proposal).'

The defined area is further explained with the help of a diagram (Fig. 4) in the [Managing the development of houses in multiple occupation SPD](#). It is intended that the SPD will support the new policy.

***PQ81. Paragraph 6.58 refers to Article 4 Directions. Are there any within the city and if so, could the Council provide a map showing where these are located?***

Council's response

The council has made seven Article 4 Directions within Bristol relating to HMOs. A map is provided with these responses (see Appendix 3) and can also be viewed on the council's [Article 4 Directions](#) web page.

**PQ82. Paragraphs 6.63 provide more detail on how a local imbalance will also be assessed? Why has this not been included as criteria within the policy text?**

Council's response

The council's [Managing the development of houses in multiple occupation SPD](#) was brought forward to provide further guidance on the implementation of existing policy DM2 'Residential Sub-divisions, Shared and Specialist Housing' (DPD002), specifically section 1 (*General Criteria*), part (ii), and describes situations where 'harmful concentrations' are likely to arise. Section two of the new policy (*Houses in multiple occupation - avoiding a local imbalance*) now provides a general description of these situations (not included within existing policy DM2). Given the level of detail set out in the SPD the preference is for this part of the policy to be implemented with reference to the existing SPD rather than providing more detail within the policy. The relevance of referencing the SPD to implement this part of the policy is set out at para. 6.65. Whilst some further detail is provided in paragraph 6.63 the full detail is set out in the SPD.

**PQ83. Paragraphs 6.65 and 6.66 refer to the Managing the development of houses in multiple occupation Supplementary Planning Document. What date was this published? Does it provide guidance for Local Plan policies which are intended to be replaced as part of the Local Plan?**

Council's response

The [Managing the development of houses in multiple occupation SPD](#) was published in November 2020 and provides guidance for existing policy DM2 'Residential Sub-divisions, Shared and Specialist Housing' (DPD002). The council's intention is for the SPD to provide guidance to policy H6 'Houses in multiple occupation and other shared housing' which replaces section 1 (*General Criteria*) of existing local plan policy DM2.

**Policy H7 - Managing the development of purpose-built student accommodation**

**PQ84. The Joint Impact Statement produced by UWE Bristol and UoB indicate projected growth in student numbers for both universities up to 2040. However, the Topic Paper on Managing Purpose Built Student Accommodation indicates that no need for UWE Bristol has been included. Could the Council provide further explanation as to why this is the case?**

Council's response

The council was advised through previous communications with UWE that the university was not planning for any substantial growth in student numbers over the plan period, and that growth figures for UWE set out in the Joint Impact Statement (provided by UoB) were not recognised. UWE's subsequent representation on the Bristol Local Plan Publication Version (November 2023) submitted by Jones Lang LaSalle includes reference to the same growth numbers as set out in the Joint Impact Statement. Following the council's request for clarification from UWE the

university have recently confirmed that their position on growth is as reflected in the Jones Lang LaSalle representation.

What is still not demonstrated is the extent to which any growth in student numbers at UWE will increase the need for student bed spaces within Bristol, both in terms of the level of need to be met and the locations where such need should be addressed.

It is understood from recent informal discussions that much of the growth identified would be degree apprenticeships, short courses, online programmes and other educational activities focused at UWE's main campus at Frenchay in South Gloucestershire. It is also understood that the expected accommodation needs associated with these types of study are low and would be covered by additional new student accommodation in and around Frenchay campus. On this basis the council understands that any need for additional bed spaces in Bristol generated by UWE's intended growth is unlikely to be significant and can be accommodated through the current policy approach. South Gloucestershire Council has not requested that Bristol City Council explore through its local plan process the potential to accommodate any unmet need for student bed spaces arising from UWE.

UWE's main campus at Frenchay is located some distance (around 6 miles) from Bristol City Centre and within South Gloucestershire Council's area. Discussions with the university sector have indicated that it is generally considered desirable to accommodate students in reasonable proximity to educational and pastoral care facilities. A map showing the locations of campuses is provided in the Managing the Development of Purpose-Built Student Accommodation topic paper (TPC006).

***PQ85. Are there figures relating to any previous shortfall in the provision of purpose-built student accommodation and if so, what is the shortfall and has this been included in the calculation of need?***

Council's response

The policy approach is focused on the provision of sufficient PBSA to meet future student growth (Policy H7 first paragraph, third bullet and paragraph 6.71). The council is aware that the needs of the existing student population have been met to date through a variety of existing accommodation types including university owned halls of residence and houses, PBSA and other forms of small-scale private accommodation including shared houses/flats. On this basis the policy has not considered the issue of supposed existing under-supply of PBSA given that all existing students are understood to have some form of accommodation. Consequently, the policy approach does not calculate a figure relating to any supposed shortfall in PBSA or include such a figure in the overall calculation of need.

***PQ86. The second paragraph of policy H7 refers to having the support of relevant higher education providers where larger scale development is proposed. How is larger scale development to be defined?***

Council's response

Larger scale PBSA development is envisaged as schemes providing 250 bed spaces or more. This is based on the council's previous communications with UoB regarding their design requirements for new student accommodation housing UoB students.

These include an expectation that PBSA developments generally exceed 250 bed spaces. A copy of the design requirements was provided to the council in early 2020.

A suggested modification to paragraph 6.75 inserting the 250 bed space figure has been added to the Schedule of Suggested Main Modifications (EXA002) to provide clarity. This is shown below:

Policy H7, paragraph 6.75:

6.75 Development should also demonstrate how the accommodation needs of relevant higher education providers are being met in terms of the quantity, type and quality of accommodation to be provided. All larger scale development (250 bed spaces or more) will need to have the support of the relevant higher education provider where accommodation is being provided for students of that institution. This could take the form of a nomination agreement between the institution and the accommodation provider.

***PQ87. Paragraph 6.77 states that development counting towards the bed space limits for all defined areas set out in the policy includes all development completed, started, or with extant planning permission since March 2019. What is the basis for using this date?***

Council's response

This is the original base date retained from the Regulation 18 version of the policy (PCD002). At this point in time the student bed space count for each of the defined areas was nil with the draft policy making provision for a specified level of new bed spaces. Since that time sites with planning permission for PBSA have come forward in two defined locations: Bristol Temple Quarter & St. Philip's Marsh and Central Bedminster. To date no sites with planning permission have come forward in the remaining defined locations: UoB city centre precinct, Bristol Shopping Quarter, Frome Gateway, and UoB residential campuses at Clifton and Stoke Bishop.

***PQ88. Policy H7 states that the development of purpose-built student accommodation at other appropriate locations identified and demonstrably supported by local communities, including through Neighbourhood Development Plans or other community-led strategies. Can the Council confirm whether this list is exhaustive or whether there are other ways by which community support may be demonstrated?***

Council's response

The list is not intended to be exhaustive. The policy provides examples of how a local community could identify and demonstrate support for PBSA development within their locality but does not seek to preclude other means of identifying and supporting PBSA development. Para. 6.81 of the explanatory text sets out further examples including Neighbourhood Development Orders and published community plans.

Suggested modifications to the policy and paragraph 6.81 of the explanatory text that provide the clarification, as explained above, have been added to the Schedule of Suggested Main Modifications (EXA002). This is shown below:

Policy H7, policy text, section '*Purpose-built student accommodation provision in locations supported by local communities*', first paragraph:

Development of purpose-built student accommodation at other appropriate locations identified and demonstrably supported by local communities, including for example through Neighbourhood Development Plans or other community-led strategies, will be acceptable where it is consistent with other relevant provisions of this policy.

Policy H7, paragraph 6.81:

Other appropriate locations will include those identified by local communities, including for example through Neighbourhood Development Plans, Neighbourhood Development Orders and other published community strategies or plans.

***PQ89. The policy states that the development in all locations will be expected to include an appropriate proportion of affordable student housing to meet identified need. Could the Council provide confirmation of how this need will be identified? How is an 'appropriate proportion' to be calculated? How have the results of the Viability Assessment informed the requirement for affordable student housing?***

#### Council's response

The method of determining affordable student housing need is identified at para.6.88a of the explanatory text to the policy and is explained in more detail in the Managing the Development of Purpose-Built Student Accommodation topic paper (TPC006).

The level of need for affordable student housing can be broadly quantified by reference to the number of students receiving the full government maintenance loan for living costs. This award is made to students from households where incomes are £25,000 per annum or less. The proportion of students falling into this category can be a starting point for determining the 'appropriate proportion' of affordable student housing required as such students would be from lower income households and therefore the most likely group to be in need of affordable student housing. Based on data provided by the Student Loans Company on numbers of students falling into this category the council has indicated that 35% affordable student housing would be an 'appropriate proportion' to seek.

Alternatively, the need for affordable student housing and the 'appropriate proportion' sought can be determined in consultation with the universities. This option is also identified at para. 6.88a of the explanatory text to the policy.

The Bristol Local Plan Viability Assessment (EVEV01) indicates that the provision of 35% affordable student housing, based on rental levels as described at para. 6.88a of the explanatory text to the policy, will be viable in most development scenarios tested.

#### ***Policy H8 – Older people's and other specialised needs housing***

***Policy H8 considers the issue of providing homes for older people. It states that the development of extra care housing or housing-with-care comprising 60 dwellings or more should provide a minimum of 10% affordable housing.***

**PQ90. Could the Council explain how it has determined the threshold of 60 dwellings or more and the provision of 10% affordable homes?**

Council's response

The threshold of 60 dwellings has been informed by the scheme size preferences of extra care developers/providers (who have previously engaged with the council) and the size of existing extra care schemes within Bristol (very few schemes are substantially below this threshold). The likely minimum size of a scheme is also set out in guidance produced by the Housing Learning and Improvement Network (LIN). Their document [Design Principles for Extra Care Housing](#), published in June 2020, states:

*'The minimum number of apartments for extra care housing is now thought to be 60 in order that the housing management, care and support services and any additional facilities can be financially viable.'* (p. 13)

For the reasons given the council does not expect many schemes to come forward in Bristol that are less than 60 units. It is therefore considered reasonable to set the site size threshold for affordable housing at this level.

Evidence set out in the [West of England extra care housing improvement project report \(August 2023\)](#) identifies the percentage of older households in Bristol living in social housing as 23% (Table 10). The report also states that evidence from socio-economic factors indicates that there is likely to be ongoing need for affordable extra care housing to rent particularly in Bristol (para. 2.15). A requirement for 10% affordable extra care homes is therefore considered appropriate based on the existing tenure of older households in the city and likely future need.

The report can be added to the examination library.

**PQ91. Could the Council explain what the Housing our Ageing Population Panel for Innovation (HAPPI) principles are and how they would be expected to be taken into account? Would these constitute additional standards against which any development would need to comply?**

Council's response

The Housing our Ageing Population Panel for Innovation (HAPPI) was established by the government in 2009 to advance existing good practice and promote new ideas in the design of housing for older people. The HAPPI principles refer to the 10 recommendations made by the panel for the design of older people's housing and are set out in the [Housing our Ageing Population: Panel for Innovation Report 2009](#). The principles relate to:

- Space and flexibility;
- Daylight in the home and in shared spaces;
- Balconies and outdoor space;
- Adaptability and 'care ready' design;
- Positive use of circulation space;
- Shared facilities and 'hubs';
- Plants, trees, and the natural environment;

- Energy efficiency and sustainable design;
- Storage for belongings and bicycles;
- External shared surfaces and 'home zones'.

The principles are not intended to be used as additional standards to measure the design quality of development. Instead, they are meant to support the assessment of older people's housing development against criterion (vi) of the policy's *General provisions* which expects a good standard of accommodation that meets the specific needs of all occupiers.

### ***Policy BTR1 – Build to Rent Housing***

***Policy BTR1 sets out the approach to build to rent housing, including the requirement for 20% affordable homes.***

***PQ92. Under Policy BTR1, could the Council explain how it has determined the 20% requirement for affordable homes and the tenure split for build to rent?***

#### Council's response

The 20% requirement is consistent with Planning Practice Guidance ([Build to rent - Affordable housing](#); Paragraph: 002 Reference ID: 60-002-20180913) which identifies 20% as a suitable benchmark for the level of affordable housing in build to rent schemes.

The preferred tenure split for any affordable housing secured is 75% social rent and 25% shared ownership. This is in line with the tenure requirement set out in policy AH1 'Affordable housing provision'. However, this is only sought where any affordable housing secured can be delivered wholly within a separate stand-alone block. If this is not feasible, e.g. where the development can only comprise of a single block, any affordable housing secured is expected to be delivered as affordable private rent.

The approach to affordable housing tenure in the policy is consistent with Planning Practice Guidance ([Build to rent - Affordable housing](#); Paragraph: 004 Reference ID: 60-004-20180913) which expects developers to usually meet their affordable housing requirement by providing affordable rent homes but allows for this requirement to be met by other routes including other forms of affordable housing as defined in the NPPF glossary. The council has been implementing this flexible approach to tenure in build to rent developments for a number of years using existing guidance [Delivery of affordable build to rent homes in Bristol - Affordable housing practice note](#). A number of build to rent developers in Bristol have delivered or are delivering/progressing stand-alone affordable housing arrangements comprising social rent and shared ownership as part of their development in line with this guidance.

The practice note can be added to the examination library.

### ***Policy H10 - Planning for traveller sites***

***Paragraph 6.134 of the introduction to Policy H10 refers to the Gypsy and Traveller Accommodation Assessment (2020) identifying a need for pitches for travellers and a need for plots for travelling showpeople.***

**PQ93. Have the Council undertaken any assessment of sites for accommodating these needs and if so, could this information be provided? If this hasn't been undertaken, what are the reasons for this?**

Council's response

The Gypsy and Traveller Accommodation Assessment (EVEH04) has identified relatively low levels of assessed need for pitches for travellers and plots for travelling showpeople. Sites have not been identified through the local plan process. The local plan approach has instead been to set out a criteria-based policy for meeting needs against which future proposals can be considered.

This approach is considered an appropriate and practicable approach to ensuring the delivery of sites to meet needs. For example, the council has recently approved the use of vacant land at Western Drive Hengrove for the development of a permanent traveller site subject to planning consent ([Cabinet decisions 7<sup>th</sup> February 2023](#) - Item 8). The council's housing and property services also regularly review all land coming up for disposal to determine whether it can be used for this purpose. Through this approach there is an on-going process for reviewing potential permanent traveller sites.

**PQ94. Document EXA002 accepts the need to change the definition of gypsies and travellers as set out in the PPTS for Travellers Sites. Does this have any implication for the results of the Council's Gypsy and Traveller Accommodation Assessment and has any update been undertaken since 2020?**

Council's response

The update to the definition of travellers set out in Planning policy for traveller sites has had no significant implication for the results of the Bristol Gypsy and Traveller Accommodation Assessment (EVEH04). The Assessment is reviewed on a 5-year cycle with the next review due in 2025.

**PQ95. Has any assessment of the needs of Houseboat dwellers been undertaken, and if it has not, what are the reasons for this?**

Council's response

No assessment has been undertaken for the local plan but the council is not aware any current direct need for any additional permanent residential moorings in Bristol that is driven by a local need or demand for additional moorings.

**Employment Land Requirement and Supply**

**The Employment Land Topic Paper<sup>8</sup> sets out information relating to how the employment land requirements have been identified and the supply position.**

**PQ96. Could the Council provide a simple schedule identifying the main sources of anticipated supply for office, industry and distribution uses over**

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<sup>8</sup> TPC003

***the plan period. This should include what is expected to be delivered by the proposed allocations. Again, if known, this should include any completions that have taken place since the Plan's start date.***

#### Council's response

Supply is proposed to come from a combination of sites in the planning pipeline used to underpin the findings of the employment land topic paper and additional but uncommitted supply or committed supply not featuring in the pipeline.

The targets for additional supply (over and above the pipeline) are intended to be aspirational, providing room for economic growth and a response to the need to supply against replacement demand. They are based principally on known development interest, advice received on development potential and – in the case of Temple Quarter – targets for growth included in bids for funding. Policy has been shaped to support development of this nature and scale whilst providing some flexibility around which sites will come forward; the figures for additional supply have not been based on the expectation that specific sites used for the basis of these calculations will all come forward as indicated.

It is important to note that additional supply may result from the provision of employment space in areas of growth and regeneration, and on former employment sites coming forward for mixed use development where an element of employment space must be included as part of development proposals.

Over the plan period **office space** is anticipated to come forward from two principal sources:

Source	Gross floorspace anticipated to come forward (sq m GIA)
2021-22 pipeline of development – committed sites	190,682
Development in addition to the 2021-22 pipeline, through additional space being provided on existing sites or new sites coming forward	164,058

The figure for development in addition to the 2021-22 pipeline, through additional space being provided on existing sites or new sites coming forward, is based on an assessment of potential development sites that identified the following:

- 66,744 sq m GIA permitted but not featuring in the planning pipeline (namely St Mary le Port, Temple Square and Bart Spices)
- 73,543 sq m GIA featuring in development proposals known to the Council (namely Silverthorne Lane and 50,000 sq m located on sites where the developer's proposals are confidential)
- 23,771 sq m featuring in successful bids for Government and WECA funding (for sites at Temple Meads and Temple Island).

Over the plan period **industry and warehouse space** is anticipated to come forward from the following sources (see site references below):

Source	Gross floorspace anticipated to come forward (sq m GIA)
--------	---------------------------------------------------------

2021-22 pipeline of development – committed sites	124,692
Avonmouth – development already permitted in allocated sites but not featuring in the 2021-22 planning pipeline <sup>[A]</sup>	103,903
Avonmouth – development potential identified on allocated sites not yet featuring a permission at the time the 2021-22 pipeline was prepared <sup>[B]</sup>	41,838
Uplift in industry/warehouse provision to come forward in designated industry and distribution areas <sup>[C]</sup>	18,596

Site references:

- A. Comprised of land at Kings Weston Lane south of Access 18 and land at Packgate Road
- B. Comprised of land east of Chittening Road and land south of Seabank Power Station
- C. Based on quantification of net uplift potential on Industry and Distribution Areas over a five year period from 2023 as advised by consultants, used by Bristol City Council as a proxy for potential overall.

***PQ97. Given the range of potential requirements set out in some detail in TCP003<sup>9</sup>, could the Council briefly summarise how it arrived at the requirement figures of 164,000 sqm net for both net additional floorspace for offices and for industry and distribution floorspace?***

#### Council's response

The requirement for office space is based on known development potential, some of which benefits from a previous planning permission, and sites identified in bids for Government or WECA funding broken down as follows:

- 66,744 sq m GIA permitted but not featuring in the planning pipeline (namely St Mary le Port, Temple Square and Bart Spices).
- 73,543 sq m GIA featuring in development proposals known to the Council (namely Silverthorne Lane and 50,000 sq m located on sites where the developer's proposals are confidential).
- 23,771 sq m featuring in successful bids for Government and WECA funding (for sites at Temple Meads and Temple Island).

The requirement for industry and distribution based on evidence on development potential provided by market consultants (Bristol Employment Land Review update, June 2023, EVEE02), and features 3 components:

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<sup>9</sup> Document TCP003 – Employment Land Topic Paper (November 2023)

- JLL noted that 2 sites identified for allocation at Avonmouth already benefited from planning permission but did not feature in the 2021-22 planning pipeline. The permissions have established a quanta of development for these sites of 103,903 sqm GIA.
- 2 further sites at Avonmouth have been allocated. JLL identified potential development quanta for each, and applied a risk weighting according to their likelihood of coming forward over the next 5 years. Our overall requirement includes a risk weighted quanta of 41,838 sqm GIA which is based on JLL's low plot ratio scenario for these sites, which we believe to be appropriate given the range of constraints to development applicable in Avonmouth and more reflective of recent patterns of development than the high plot ratio one.
- JLL identified 9 sites in the proposed industry and distribution areas, in the urban part of the city outside Avonmouth, which offered some potential to provide an uplift in floorspace through redevelopment or intensification over the next 5 years. We have used JLL's figures and risk weighted range to identify a potential development quanta for these sites based on a 0.55 plot ratio, slightly less dense than the 0.6 plot ratio suggested by the high end of JLL's development scenarios, to factor in further scope for site constraints. This approach suggests a combined development potential for this type of site of 18,596 sqm GIA.

***PQ98. Could the Council explain how the requirements for office and industry and warehousing floorspace relate to existing commitments for offices, industry and distribution floorspace?***

Council's response

The requirements for office and industry and warehousing are additional to existing commitments for such space. Taken together they enable the plan to respond to the likely future demand suggested by employment forecasts and provide capacity to respond to replacement demand.

***Other Employment policies***

***Policy E4 – Avonmouth Industrial Area and Bristol Port***

***PQ99. Could the Council confirm whether the sites listed as allocations in Policy E4 were selected using the same process as all other allocations in the Plan?***

Council's response

The green field site allocations within Policy E4 'Avonmouth Industrial Area and Bristol Port' have been selected due to the location and potential of the sites to deliver an extension of the existing industrial area which extends over about 640 hectares in Avonmouth. It is an area of opportunity for the identification of new sites for industrial development. The sites fall within the Avonmouth Severnside Enterprise Area.

The sites were selected using similar considerations to the selection of other development site allocations, whilst having regard to the location and the specific objectives these particular allocations seek to address. The locations are informed by the [Avonmouth and Severnside Integrated Development, Infrastructure And Flood Risk Management Study February 2012](#). This can be added to the examination document library.

Planning permission has been granted for the largest of the E4 site allocations (ASA001 Land at Kings Weston Lane, south of Access 18), through the hybrid application 20/02903/P: for a mixed commercial/industrial development for A1, A3, A5, C1, D1, D2, B2 and B8 use classes over seven plots. This draft allocation and now permission extends the existing Access 18 development. The site comprises 42 hectares of land north-west of Avonmouth Way and predominantly to the south-west of Kings Weston Lane, with the adjoining land to the north, south and west designated as Avonmouth Industrial Area under Policy E4 (and Principal Industrial and Warehousing Area in existing local plan policy).

The smaller remaining sites all adjoin the existing industrial area. They have been identified as being suitable for development having regard to absence of development constraints and the potential for any impacts on the Severn Estuary to be mitigated.

Further information on development site allocations is given in answers to PQ13-20.

***PQ100. Given there are no development requirements, could the Council explain on what basis proposals in these allocations would be determined? Can the Council also explain why these sites do not appear in the Development Allocations Annex?***

Council's response

The allocations would be developed in accordance with relevant policies in the plan and any relevant matters within Policy E4 'Avonmouth Industrial Area and Bristol Port' itself.

These site allocations are embedded within Policy E4 which covers the Avonmouth Industrial Area and Bristol Port. The policy with its allocations sets out a holistic approach to this location.

In the pre-ambule to the Development allocations policy DA1 'Proposed development allocations', paragraph 16.3 explains that the proposed development allocations across the city are accompanied by Policy E4 which includes the further series of allocations for development of industrial and distribution uses.

As mentioned in response to the previous PQ, the largest of the sites 'Land at Kings Weston Lane, south of Access 18' was subject of a planning application after the site was identified as a draft development allocation in the local plan consultation of 2019 - Draft Policy E5 in that version (PCD002). Permission was granted in 2022 prior to the publication of the local plan, with various reserved matters and conditions matters continuing to be processed through 2023 and 2024.

**PQ101. Further to the above, could the Council provide additional clarification about the role of Hallen Marsh in terms of habitat mitigation?**

Council's response

The role of Hallen Marsh is to mitigate the ecological effects of existing and committed development which reduced the amount of available habitat for wetland birds. It is part of over 80 hectares of new wetland habitats created by the Avonmouth Severnside Enterprise Area (ASEA) Ecology Mitigation and Flood Defence Project and comprises wetland habitat for birds along the internationally important Severn Estuary site. The works in this area involve the removal of vegetation to create an open area, the widening of ditches to form scrapes, and the restoration and extension of an existing pond to the east of the site.

Hallen Marsh (in Bristol City Council administrative boundary), along with Northwick (in South Gloucestershire Council administrative boundary), has created new wetland habitat which allows the Enterprise Area as a whole to fulfil its full economic potential without significantly and adversely affecting the conservation objectives of the Severn Estuary Special Protection Area (SPA)/Special Area of Conservation (SAC)/Ramsar site. In the context of the Bristol Local Plan it has enabled the allocation of the greenfield sites for the development of industrial and distribution uses, adjacent to the existing industrial areas at Avonmouth.

**Policy E5 – Industry and Distribution Areas**

**PQ102. Further to our questions about Regulation 8(5) and references to Neighbourhood Plans, could the Council explain any implications for the Old Market Quarter Neighbourhood Plan resulting from Policy E5 and any associated designations illustrated on the policies map?**

Council's response

No implications are anticipated for the Old Market Quarter Neighbourhood Plan resulting from Policy E5 'Industry and Distribution Areas' and its associated designations on the policies map. This is because Policy E5 proposes a similar approach to the existing Local Plan, namely Site Allocations and Development Management Policies Local Plan Policy DM13 'Development proposals on Principal Industrial and Warehousing Areas'.

Both E5 and DM13 identify existing industrial and distribution areas which are of strategic economic importance. They are described as 'Principal Industrial and Warehousing Areas' under existing Policy DM13 and 'Industry and Distribution Areas' under new Policy E5. Both policies seek to retain these areas for industrial and distribution activities whilst setting out the limited circumstances where alternative uses may be acceptable.

The Old Market Quarter Neighbourhood Plan policy most relevant to Local Plan Policies E5 and DM13 is Policy B5. It was prepared following the adoption of the Site Allocations and Development Management Policies Local Plan in 2014.

The preamble to Neighbourhood Plan Policy B5 states that it supports the principal function of the Principal Industrial and Warehousing Areas and recognises their positive impact on the area through the provision of local employment. It shows these areas on 'Map 5: Policies' of the Neighbourhood Plan, the boundaries of which

mirror those shown on the Site Allocations and Development Management Policies Local Plan Policies Map.

Neighbourhood Plan Policy B5's preamble also states that it augments Local Plan Policy DM13 by offering a more flexible approach to development in the Principal Industrial and Warehousing Areas.

Neighbourhood Plan Policy B5 states that:

*'Within the Principal Industrial and Warehousing Areas defined on Map 5: Policies, proposals for development involving the provision of residential or other non-industrial uses will only be permitted where the site is located on the perimeter of the area so designated, where the use remains predominantly commercial, and where it can be shown that a satisfactory standard of amenity would be provided for any residential occupiers.'*

As new Local Plan Policy E5 proposes a similar approach to existing Policy DM13, it is not considered there would be any implications for the Old Market Quarter Neighbourhood Plan resulting from Policy E5. For example, it is anticipated that the decision-maker on relevant planning applications could continue to apply Neighbourhood Plan Policy B5 by assuming that the Principal Industrial and Warehousing Areas referred to in Policy B5 would be the Industry and Distribution Areas designated by new Local Plan Policy E5.

Regarding the boundaries of the Industry and Distribution Areas shown on the new Local Plan Policies Map, these are slightly different to the Principal Industrial and Warehousing Areas shown on the existing Site Allocations and Development Management Policies Local Plan Policies Map and 'Map 5: Policies' of the Old Market Quarter Neighbourhood Plan.

This change relates to the existing Pennywell Road Principal Industrial and Warehousing Area, which covers a small portion of the northernmost part of the Old Market Quarter neighbourhood area either side of Little George and Little Ann Streets. This now forms part of the area covered by new Local Plan Policy DS5 'Frome Gateway', which proposes a mix of uses in this location close to the city centre. If new Local Plan Policy E5 were to be adopted, Old Market Neighbourhood Plan Policy B5 would not be applicable for relevant planning applications in this location as it would no longer be identified in the Local Plan as being of strategic economic importance.

### **Policy E6 – Affordable workspace**

**PQ103. Could the Council also explain the justification for requiring affordable workspace, how the scale of provision would be determined and whether there would be any thresholds for requiring such provision?**

#### Council's response

Policies which seek the provision of affordable workspace have been included within local plans in London for some time. The policy proposed for Bristol is in response to similar needs arising in the economy in Bristol.

Provision of affordable workspace is important to ensure that individuals, organisations and businesses can access a range of employment spaces at affordable rates and on flexible terms for economic, social and cultural purposes.

There is a need and demand within the city for affordable workspace, and therefore Policy E6 is intended to ensure that as sites and areas are redeveloped with commercial space, there is a mechanism to seek and secure affordable workspace so that this an important part of the city's economic base continues to be supported.

The council has prepared a note setting out the reasons for seeking affordable workspace. This is attached as Appendix 4 and can be provided separately as an examination document.

Affordable workspace will be sought from proposed mixed-use development schemes, in regeneration areas, which are providing one or more of the following:

- 1000sqm of commercial space;
- a minimum of 100 residential units;
- 250 PBSA units; or
- the equivalent in scale if schemes are proposing a mix of PBSA and residential.

Through engagement with affordable workspace operators, the minimum quantum of space that is commercially viable to manage is c1,000sqm. This could be delivered as part of one development or across several schemes that are in proximity. It is acknowledged that it will not be viable to deliver affordable workspace on all sites, and therefore the level of affordable workspace that will be sought will be subject to each site's viability.

It is suggested that modifications are made to Policy E6: Affordable workspace, these changes reflect the details outlined above.

Policy E6, para 7.43, 3rd sentence:

Thus, this policy enables development proposals to provide affordable workspace in areas where it is needed, where it would be consistent with the viability of development proposals.

Policy E6, Policy text, 1<sup>st</sup> section '*Provision of Affordable workspace*', 1<sup>st</sup> sentence:

The provision of affordable workspace will be sought, ~~required~~ where viable, from proposed mixed use development schemes, in regeneration areas, which are providing one or more of the following:

- 1000sqm of commercial space;
- A minimum of 100 residential units;
- 250 Purpose Built Student Accommodation (PBSA) units; or
- The equivalent in scale if schemes are proposing a mix of PBSA and residential units.

Policy E6, Policy text, 1<sup>st</sup> section '*Provision of Affordable workspace*', 2nd sentence:

~~in areas identified in the Affordable Workspace SPD~~ The policy aims to promote affordable workspace where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute

to the character of an area.

Policy E6, Explanation, para 7.47, 2<sup>nd</sup> sentence:

The council will use conditions and/or planning obligations to limit uses consented within Class E and B in order to achieve the objectives of this policy. ~~The policy requirements will apply to net additional floorspace brought forward as part of new development, including redevelopment or extension of existing floorspace.~~

Policy E6, Explanation, insert new para after para 7.47:

7.47A - Through engagement with affordable workspace operators, the minimum quantum of space that is commercially viable to manage is c1000sqm. This could be delivered as part of one development or across several schemes that are in proximity. It is acknowledged that it will not be viable to deliver affordable workspace on all sites, and therefore the level of affordable workspace that will be sought will be subject to each site's viability.

Policy E6, Explanation, para 7.51, 2<sup>nd</sup> sentence:

~~This requirement~~ will be secured as a planning obligation and a monitoring fee will be sought from the developer. Further information will be provided in the Affordable Workspace SPD.

**PQ104. What is the status of the Affordable Workspace SPD?**

Council's response

The Affordable Workspace SPD is a proposed SPD that would stand with the new policy. It would address the matters referred to in the policy and explanatory text.

**Policy E8 – Digital connectivity and inclusion**

**Policy E8(ii) states that developments should be designed to connect to superfast broadband services and that this service should be made available to occupiers. The 2022 amendments to the Building Regulations cover the provision of broadband to housing.**

**PQ105. Could the Council explain what implications the revised Building Regulations have for this policy, if any?**

Council's response

The 2022 amendments to the Building Regulations which cover broadband connectivity are unlikely to have significant implications on Policy E8 'Digital connectivity and inclusion', as the local plan policy adds value to the legal requirements and statutory guidance through promoting competition among broadband providers and consumer choice by including provision for multiple broadband infrastructure providers to access a development site.

### **Other Development Management Policies**

**The following does not constitute the full range of questions or queries we shall have about development management policies. Rather, answers to these questions are necessary to assist in the preparation of our MIQs and provide clarity.**

#### **Infrastructure, Developer Contributions and Social Value**

##### **Policy SV1 – Social Value and Inclusion**

**Policy SV1 states that a Social Value Strategy should identify how the development will support social inclusion and deliver social value throughout its lifecycle.**

**PQ106. Could the Council explain the justification for provision of a ‘Social Value Strategy’ and explain how it would be applied in the determination of any future application for planning permission?**

##### Council’s response

The social value strategy would identify how development will support social inclusion. It would be applied through condition. An example of another policy which encompasses social value is Policy E1 ‘Inclusive economic development’ which reflects an approach established in operation in the city.

As indicated in paragraph 4.8, the council will publish advice on the content of social value strategies which would be based on its general Social Value Policy which is published on the council’s website [Social Value Policy \(bristol.gov.uk\)](https://www.bristol.gov.uk/social-value-policy)

The social value planning policy SV1 is similar to ones used elsewhere and would operate in a similar way. An example from the adopted Salford Local Plan is shown in Appendix 1 (Adopted Salford Local Plan January 2023 Policy F2 ‘Social Value and Inclusion’).

### **Urban Living: Making the best use of the city’s land**

**Policies UL1 and UL2 seek to use land in the city effectively and seek to identify opportunities for developments that feature a higher density.**

**PQ107. Can a definition of the terms ‘under-used’ and ‘more intensive’ be provided?**

##### Council’s response

The term ‘*under-used land and buildings*’ in this policy has a meaning similar to the use of ‘under-utilised’ in the NPPF September 2023 paragraph 120 (d). The NPPF does not further define under-utilised land although it does give a few examples (converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure) which are highly varied in character.

The term ‘*more intensive forms of development*’ has a similar meaning to ‘higher densities of development’ as used in the context of existing Core Strategy Policy BCS20 ‘Effective and Efficient Use of Land’ (DPD001) but also encompasses intensity of use which can also be a factor in the overall intent of the policy of ensuring land is used efficiently. So *more intensive forms of development*, in the

context of a policy dealing with efficient use of land, refers to development of a higher density or greater use intensity than would be expected in other areas of the city.

***PQ108. Given Policy UL2 identifies the minimum densities for different parts of the city, what is the role and purpose of Policy UL1? Is it clear how the two policies relate to each other and whether they are consistent, particularly in terms of references to 'optimum' and 'minimum' densities?***

Council's response

Policy UL1 'Effective and efficient use of land' is the overarching policy on efficient use of land and relates to all forms of development. It sets out overarching principles that relate to achieving an efficient use of land and optimum densities, as well as where more intensive forms of development may be appropriate such as in centres and locations proximate to public transportation links. Optimum density is described in the explanation section of the policy (paragraph 5.7) as that which 'balances the efficient use of land with liveability considerations, responding positively to context and making successful places' and refers to both residential and non-residential development.

UL2 'Residential densities' introduces specific minimum densities for homes consistent with paragraph 125 A and B of the NPPF (September 2023) which specifically suggests minimum density standards for housing/residential development. The policy sets out minimum residential densities across the entire city, across different areas of the city and policy caveats that may make it appropriate for residential development to be built to a lower density in certain circumstances. The use of suggested minimum densities is intended to encourage denser forms of residential development across the city, and more intensive residential development in areas identified as appropriate.

Therefore, Policy UL1 deals with making efficient use of land and optimising density. Policy UL2 helps to secure optimum density and efficient use of land through minimum residential densities.

The policies would be read together when assessing the suitability of a given residential scheme and work collectively to ensure that both an optimum level of density is achieved, having regard for liveability, placemaking and context considerations, whilst promoting the overall delivery of higher density development in areas where it is appropriate.

***PQ109. Could the Council explain the how the proposed densities have been calculated?***

Council's response

The chosen minimum density of 50 dwellings per hectare in policy UL2 'Residential densities' is also in existing Core Strategy Policy BCS20 'Effective and Efficient Use of Land' (DPD001). The Core Strategy also provides examples of appropriate densities in Diagram 4.20.2 based on examples of historic and contemporary developments in the city. These continue to be used as broad indicators for appropriate densities by area. The suggested densities in policy UL2 are similar, having been derived largely from precedent developments and have been present in consultation drafts since 2019. These densities have also been broadly used in the

urban potential assessment and site allocations; however, as minimums, in some instances the figures used in the assessment and allocations are sometimes higher.

In terms of establishing density when assessing a given proposal, paragraph 5.16 sets out the approach to be used: *'For the purposes of this policy, residential density is generally measured to the site boundary. Density is net, i.e. adjusted appropriately for undeveloped parts of the site (including areas required for access and circulation) and the proportion of other uses in the case of mixed-use development.'*

***Policy UL1 permits more-intensive forms of development on sites 'close to major public transport routes and corridors.' The explanation indicates that this distance is five-minutes' walk. Areas where more intensive forms of development are identified in Diagram 5.1.***

***PQ110. Could the Council explain the justification for selecting a 5-minute walking distance?***

Council's response

The policy is intended to direct denser development to locations most proximate to key transport routes and services where there will be more likelihood of use of active travel and public transportation amongst future residents.

5 minutes is considered to be an appropriate walking distance that would support the likelihood of public transport and active travel use. Although served by some urban railway stations, most of Bristol's existing public transport infrastructure is built around buses, for which the [Chartered Institutions of Highways and Transportation](#) advise that 400m (equivalent to 5 minute walking distance) has typically been regarded as a cut-off point in residential areas.

***PQ111. Could the Council explain how the different areas in Diagram 5.1 have been identified? In addition, as these areas are highlighted as being 'indicative', does this mean that the areas may change over time? If so, how would this work in practice?***

Council's response

Diagram 5.1 is intended to demonstrate the application of the policy with the current network of centres and transportation infrastructure. The policy's explanation text notes that 'over time these locations may evolve through the provision of further public transport routes and infrastructure' – which means the areas shown in the diagram may change over time. The areas are therefore indicative as they are intended to show the approach to assessing the current suitability of higher density development.

The areas have been identified based on their proximity to the city centre, town and district centres and public transport infrastructure and routes. A 400m or roughly 5 minute walking distance has been used to define the extent of these areas around town and district centres, railway stations and public transport routes. The inner urban area (more intensive) has been identified by using a 20-minute walking distance from the city centre to reflect the city centre's suitability for more intensive forms of development. The Bristol City Centre, Temple Quarter & St Philip's Marsh area reflects the council's development strategy and established boundaries of the

city centre. A similar diagram is used in the Core Strategy (DPD001), paragraph 4.20.1 which sets out the approach to the efficient use of land in the current local plan.

If there were new major public transport routes/facilities developed, the application of the policy would reflect that even if the current diagram does not. For example, where a new train station was provided, the surrounding area would become suitable in principle for more intensive development, in line with the policy's provisions. In these or similar circumstances, the diagram would be updated by means of a non-material change to the local plan.

***PQ112. Policy UL2 refers to 'suitable sites'. However, this phrase is not defined. Can a definition be provided?***

Council's response

The term 'suitable sites' is not intended for definition. The policy is indicating that higher density development will be appropriate in the circumstances envisaged in the policy unless the site is unsuitable, for the reasons set out in the fifth paragraph of the policy text and the subsequent bullet points.

***PQ113. Policy UL2 refers to 'market signals.' Could the Council define this term and explain how this information would aid the assessment of proposed developments?***

Council's response

This section of policy UL2 'Residential densities' sets out instances where it may be appropriate for development to be of a lower density than the suggested minimums. It is intended to provide a degree of flexibility in the application of the policy and ensure that development comes forward on sites where it may not be viable or desirable to deliver the minimum levels of density suggested.

'Market signals' would be cues taken from market analysis - a similar meaning to its use in the NPPF (September 2023) paragraphs 31 and 61. In this instance it would refer to the assessment of various indicators that determine overall marketability of a scheme leading to a conclusion as to whether a development can only be viable if it falls below the minimum density expected by the policy.

This could be more simply expressed by modifying the wording. A suggested modification has been added to the Schedule of Suggested Main Modifications (EXA002) as shown below:

Policy UL2, policy text, 5<sup>th</sup> paragraph, 3<sup>rd</sup> bullet:

~~Where market signals, local housing market trends and local housing needs, local market conditions and local housing needs demonstrate that~~ higher density forms of development are not viable.

## **Centres, Shopping, and the Evening Economy**

### **Policy SSE1 - Supporting Bristol's Centres – network and hierarchy**

**PQ114. In the first paragraph of policy SSE1 reference is made to where uses covered by the policy may be acceptable in areas 'adjoining the centres'. How would this be assessed?**

#### Council's response

The term 'adjoining the centres' is used in Core Strategy Policy BCS7 'Centres and Retailing' (DPD001). The policy states:

*'Retail development, offices, leisure and entertainment uses, arts, culture and tourism uses will be primarily located within or, where appropriate, adjoining the centres in the identified network and hierarchy serving Bristol.'*

The wording is intended to have the same meaning as the term 'edge of centre sites' found in section 7, paragraph 87, page 25 of the NPPF (September 2023). This approach is part of the adopted Site Allocations and Development Management Policies Local Plan July 2014 (DPD002) Policy DM7 'Town Centre Uses'. Edge of centre sites will be appropriate provided that the proposal would support the role of the centre and would be of a scale and intensity proportionate to the centre's position in the identified hierarchy.

**PQ115. Would tourism uses include development for hotels and other tourist accommodation?**

#### Council's response

Tourism uses includes hotels. The term tourism uses has the same meaning as the NPPF's (September 2023) reference to 'tourist development' found in the definition of main town centre uses on page 69. The phrase 'tourism uses' encompasses tourism developments.

The term tourism uses is currently used in Core Strategy Policy BCS7 'Centres and Retailing' (DPD001). The policy states:

*'Retail development, offices, leisure and entertainment uses, arts, culture and tourism uses will be primarily located within or, where appropriate, adjoining the centres in the identified network and hierarchy serving Bristol.'*

**PQ116. Are the boundaries of individual areas referred to in the Centre Network and Hierarchy on page 112 of the Plan clearly defined on the policies map?**

#### Council's response

The boundaries of the centres in the hierarchy are shown in the Bristol Local Plan Publication Version Policies Map (November 2023) (CSD003), the key reference for them is 'Centres (SSE1)', found on page 2.

**PQ117. In relation to the 'Creation of New Centres' is it intended that it applies all parts of the hierarchy from Town Centres to Local Centres and Parades (excluding Bristol City Centre)?**

Council's response

The creation of new centres is concerned with the potential creation of new Town Centres, District Centres or Local Centres and Parades where they are of a scale, design and siting which is consistent with meeting the local needs of the area. The policy allows for new centres to be created primarily in areas of growth and regeneration and it is unlikely that the higher level centres (town/district) would be created but this is not ruled out.

**Policy SSE2 - Development in Bristol's centres**

**PQ118. Does the reference to Old City in the 4<sup>th</sup> paragraph of policy SSE2 also include St Nicholas Market?**

Council's response

St Nicholas Market would not be included in the 4<sup>th</sup> paragraph. Below are the modifications to make the policy wording more clear.

A suggested modification to Policy SSE1, Centre Network and Hierarchy table - Bristol City Centre, has been added to the Schedule of Suggested Main Modifications (EXA002) to ensure clarity. This is shown below:

Policy SSE1, centre hierarchy table, section 'Bristol City Centre':

The primary shopping areas at: Bristol Shopping Quarter (Broadmead); Park Street & Queen's Road; and ~~Old City~~ St Nicholas Market.

Other distinctive parts of the City Centre including Christmas Steps Arts Quarter; Harbourside and Wapping Wharf; Hotwell Road; Old City ~~Baldwin Street~~; Old Market; Redcliff Hill/Prewett Street; Stokes Croft; Victoria Street.

A suggested modification to Policy SSE2, paragraphs 2 and 3, has been added to the Schedule of Suggested Main Modifications (EXA002) to ensure clarity. This is shown below:

Policy SSE2, policy text, section 'City Centre', 2<sup>nd</sup> and 3<sup>rd</sup> paragraphs:

The primary shopping areas within Bristol city centre, Bristol Shopping Quarter (Broadmead), Queen's Road/Park Street and St Nicholas Market, as shown on the Policies Map, will be the focus for retail uses and new retail development. ~~The city centre primary shopping areas of~~ Bristol Shopping Quarter (Broadmead) and Queen's Road/Park Street will be the priority location for major shopping facilities. Proposals for new retail development within the primary shopping areas will be supported and encouraged. Active uses including leisure and hospitality which support the vitality and viability of these areas will be suitable within primary shopping areas.

At Old City, Harbourside and Wapping Wharf, Christmas Steps Arts Quarter, Stokes Croft and Old Market/~~Baldwin Street~~ there will be an emphasis on retaining a mix of uses to maintain the character and sustainability of these locations. This will include retaining and enhancing existing markets, supporting smaller scale and independent

retail and leisure uses, including new market provision and encouraging uses that contribute to the evening and night-time economy.

A modification is also suggested to add a map of the city centre shopping area. This will be similar to the Bristol Central Area Local Plan March 2015 (DPD003), Policy BCAP13 'Strategy for retail development in Bristol City Centre' - Figure 5.1, page 24. This has been added to the Schedule of Suggested Main Modifications (EXA002) and will seek to add extra clarity. This will be placed at the end of the policy text for Policy SSE1.

***PQ119. Does the final paragraph in the policy text of policy SSE2 relating to environmental enhancement and public realm improvements only apply to residential development? Is this requirement also covered in other policies in the Plan?***

Council's response

The policy is intended to be applicable to all major developments.

It is suggested that a sub-heading is added to the policy for clarification:

Policy SSE2, policy text, final paragraph, add sub-heading:

***Environmental enhancement and public realm improvements***

Major development proposals will be expected to contribute to environmental enhancement and public realm improvements within the city centre, and town, district and local centres and parades.

***Policy SSE3 - Supporting Bristol's evening, night-time and culture economy***

***PQ120. The 3<sup>rd</sup> paragraph of the policy refers to new evening and night-time economy uses being neighbourly. How will this be assessed?***

Council's response

Policy DPM1 would be used to consider the impacts of the development. A development would be considered to be neighbourly when the development would not have an adverse impact on the amenities of the local area having to the context and the agent of change principle.

***PQ121. What information would be required to be able to assess whether cultural venues and night-time economy uses are no longer viable?***

Council's response

Whilst cultural venues and night-time economy uses are varied and would need to be assessed in ways relevant to the specific uses, the considerations that are used to consider public house viability (Policy SSE8 and the existing Public House Practice Note) are likely to be relevant to other night-time economy use and cultural venues. Matters to be considered are likely to include: trade potential analysis; trading history accounts; evidence that venues have been operated in a positive manner and not run with a view to closure; demonstrations that all reasonable

measures to improve the viability have been pursued; and, marketing to demonstrate that an adequate marketing campaign has been undertaken.

### ***Policy SSE4 - Town centre first approach to development***

***PQ122. Is paragraph 8.20 intended to relate to planning applications and how would the restriction of uses be applied in practice?***

#### Council's response

8.20 does relate to planning applications. Where the particular Use within Class E is specified and this would remove the need for an impact assessment, planning conditions will be used to restrict the development to specified parts of Class E of the GPDO.

***PQ123. What information would be required to be able to assess whether cultural venues and night-time economy uses are no longer viable?***

#### Council's response

Please see answer to PQ121.

### ***Policy SSE5 – Temporary uses in centres***

***The text of Policy SSE5 states that proposed temporary uses will be permitted if, amongst other matters, they do not prejudice future development proposals.***

***PQ124. Could the Council define the term 'prejudice future development proposals' and explain how would this be assessed as part of the development management process?***

#### Council's response

The term 'prejudice future development proposals' features the current local plan in Policy BCAP12 'Vacant sites and temporary uses' - Bristol Central Area Local Plan March 2015 (DPD003). The policy states:

*'Proposals for temporary uses of vacant buildings or sites within Bristol City Centre that would not prejudice any future development or other purposes for which the site may be safeguarded will be acceptable where they would add to the vitality and vibrancy of the city centre and would not cause excessive noise or other pollution, cause undue detriment to the character and amenity of the surrounding area or give rise to unacceptable traffic conditions.'*

A development may prejudice future development proposals when the development would harmfully impact the viability, deliverability or function of a future development.

### ***Policy SSE7 – Provision of public toilets***

***Amongst other matters, Policy SSE7 states that all major developments that are open to the public should include toilets.***

***PQ125. Could the Council explain the justification for this policy. Furthermore, the policy does not include a threshold regarding the number of toilets that***

***should be provided within any new development. Therefore, could the Council outline how certainty will be given to developers as to the number of toilets that should be provided in a proposed development?***

Council's response

Similar policies are included in development plans elsewhere. For example, in ['The London Plan 2021'](#), Policy S6, page 233. The approach taken by Bristol City Council is consistent with the principles that policy addresses. Policy S6 is also used in the [Lambeth Local Plan 2020-2035](#) See appendix 1 for extracts from the London Plan and the Lambeth Plan.

The provision of public conveniences is important in enabling a safe and inclusive public realm. This policy aims to ensure that such provision is part of major public facing developments in centres and elsewhere.

Policy for this topic elsewhere has not sought to specify the number of toilets to be provided. This matter is likely to vary from development to development depending on their scale, function and location. These matters would be considered through relevant planning applications.

***PQ126. Several different types of development might be said to be open to the public. Therefore, could the Council clarify whether the intention of the policy is to ensure the provision of toilets in all buildings, or those where access by the public might be unrestricted?***

Council's response

The policy is applicable to major developments that are 'open to the public'; it is not applicable to all buildings over a certain size. A key matter is whether the development would be understood to be open to the public. Uses that are typically open would be understood to be places such as shops, sports, leisure and healthcare facilities, transport hubs, cultural and civic buildings and similar forms of development.

***PQ127. Could the Council confirm whether the intention is that this policy would also be applicable to existing development, such as changes of use?***

Council's response

The policies in the local plan are applicable, where relevant, to new builds or to conversions in cases where planning permission is required for such developments. If an existing building would become open to the public through development comprising a change of use, the provisions of Policy SSE7 'Provision of public toilets' would be applicable.

## **Policy SSE8 – Public Houses**

**PQ128. What evidence informs the identification threshold 800m distance in Policy SSE8?**

### Council's response

Policy SSE8 'Public houses' builds on an existing policy in the local plan, Site Allocations and Development Management Policies (July 2014) policy DM6 'Public houses' (DPD002). The policy seeks to ensure that the loss of a public house through change of use will not result in an overall deficit of provision for the local community. The policy refers to 'the locality' and 'reasonable walking distance' when considering the suitability of alternative public house provision.

The council's [DM6: Public houses Practice Note](#), published in October 2022 provides guidance as to how the policy should be implemented. The practice note identifies reasonable walking distance as being 800m which is around a ten-minute walking distance. This threshold has been used in a [planning appeal](#) in Bristol in 2021, with the inspector citing the government's [Manual for Streets](#) section 4.4 which also uses a 800m walking distance. The inspector noted: *'Manual for Streets (MfS) indicates in section 4.4 that walkable neighbourhoods are typically characterised as having a range of facilities within 10 minutes' walk, which it deems to be up to about 800m.'*

The practice note can be added to the examination library.

## **Biodiversity and Green Infrastructure**

### **Policy BG2 – Nature conservation and recovery**

**PQ129. Is the Council satisfied that Policy BG2 is consistent with paragraph 180 of the NPPF, particularly in relation to the mitigation hierarchy, the assessment of harm for local sites and policy relating to irreplaceable habitats?**

### Council's response

The avoidance stage of the mitigation hierarchy (set out at para.180(a) of the NPPF (September 2023)) is reflected by criteria (i) and (ii) of the policy and the reference to 'unavoidable' in the following sentence. The policy goes on to reflect the mitigation and compensation stages of the hierarchy in its reference to on-site and off-site mitigation.

Para.180 does not address local sites specifically but the policy approach for 'Local' sites in the policy hierarchy again reflects the avoidance stage of the mitigation hierarchy as set out in NPPF para.180(a):

*'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'*

The policy approach to irreplaceable habitats reflects the national policy wording in para.180(c):

*'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;...'*

That paragraph also makes provision for the “wholly exceptional reasons” by which loss or deterioration of irreplaceable habitats would be accepted, but it is not considered necessary for the local plan to repeat this rare exception, which would continue to be provided by the NPPF.

### **Policy BG3 – Achieving biodiversity gains**

**PQ130. The PPG<sup>10</sup> states that there is no need for policies which duplicate the detailed provisions of the statutory framework in relation to Biodiversity Net Gain. What are the implications of this, if any, for Policy BG3?**

#### Council's response

Subject to the main modification already put forward by the council the policy is consistent with the NPPF (September 2023) and the PPG.

It is considered that there are benefits to presenting a Biodiversity Net Gain policy as part of a complete suite of policies on biodiversity and nature conservation, so as to provide a totality of coverage and to allow the interactions between policies to be clearly expressed. This approach and has been followed by other local planning authorities such as Bath and North East Somerset, who adopted a Biodiversity Net Gain policy as part of their [Development Plan: Core Strategy, Placemaking Plan and Local Plan Partial Update](#).

### **Open space and Local Green Spaces**

**Paragraph 98 of the NPPF states that planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. It goes on to state that information gained from assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.**

**PQ131. Could the Council explain what evidence has been used to inform the Plan in relation to open space provision? Could the Council also explain how the Plan meets the requirements of paragraph 98 in terms of accommodating any identified needs?**

#### Council's response

The local plan is supported by the evidence in the Parks and Green Space Strategy – Main Document and Appendix March 2024 (REL008 and REL008a). This document provides evidence for open space matters including provision levels and standards for open space in quality, quantity and distance. This strategy replaced an earlier Parks and Green Space Strategy which informed the current local plan and the preparatory stages of the new local plan.

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<sup>10</sup> Paragraph 74-006-20240214

The policies and designations of the local plan provide for a network of high quality open spaces in the city. Various policies seek to retain and accommodate the needs for open space:

- Policy GIA addresses open space provision for recreation associated with new development.
- Policy GI2 'Reserved Open Green Space' gives protection for identified open spaces in the city alongside Policy GI1 Local Green Spaces. The Reserved Open Green Spaces include recreational facilities (Sports Pitches/Fields) as explained in the Local Green Space and Reserved Open Green Space Topic Paper (November 2023) (TPC005). Both policies give protection to open spaces with recreational roles and also contain policy wording to allow for ancillary development which enables provision of recreational facilities ancillary to recreational open spaces uses.
- The plan also includes Community Facilities policies which address provision and retention of sport and recreation facilities, including playing fields. Policy CF2 'Retention of Community Facilities' specifically ensures that facilities such as sport and recreational facilities are retained.
- Various development strategy (DS1, DS1A, DS2, DS3, DS4, DS5, DS6, DS7, DS8, DS9 and DS14) policies include provisions for new, enhanced and retained open space where stated.

***PQ132. Could the Council explain what “other strategies” are being referred to in the first paragraph of Policy GIA? Could the Council explain on what basis applicants would determine what an appropriate scale of open space provision would be necessary?***

Council's response

The policy refers to '*the guidelines set out in the council's strategies*' and explanatory text paragraph 9.2.6 indicates that the council's strategies provide further guidance on the approach to open space for recreation. That guidance is now provided in the Parks and Green Space Strategy March 2024 (REL008) and its Appendix (REL008a). This document has recently been updated replacing a 2008 strategy.

The Parks and Green Space Strategy 2024 provides the guidelines to which the policy refers, setting out provision standards for open space in terms of quality, quantity and distance. These are found on pages 14-16. To identify the appropriate level of open space needed to be provided applicants would refer to the Parks and Green Space Strategy and consider how the proposal would impact open space provision having regard to the standards set out in that document and also considerations such as those referred to in paragraph 9.2.7 of the policy's explanatory text.

This approach is similar to current local plan policy DM16 'Open Space for Recreation' (DPD002) which refers to standards (the plan's Appendix 1 page 93) which are the standards in the Parks and Green Spaces Strategy 2008.

The new Parks and Green Spaces Strategy was in preparation at the time the plan was being prepared and was adopted in March 2024. A modification is suggested to paragraph 9.2.6 to refer to this:

9.2.6 The council's strategies Parks and Green Spaces Strategy provides further guidance on the approach to open space for recreation.

### **Policy GI1 – Local Green Space**

**Paragraph 103 of the NPPF states that policies managing development within a Local Green Space (LGS) should be consistent with those for Green Belts.**

**PQ133. Could the Council explain what it considers the role of LGS to be in the context of the Plan?**

#### Council's response

Bristol Local Plan paragraphs 9.2.11 to 9.2.13 discuss the role of Local Green Space. It has the role envisaged in national planning policy.

The NPPF September 2023 explains that the designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. It is intended that Local Green Spaces are capable of enduring beyond the end of the plan period. National policy says LGS should only be designated in defined circumstances. The designation allows the protection of existing open spaces which are demonstrably special to a local community having unique characteristics that require safeguarding. These special qualities mean that the open space should be kept as such permanently.

National planning practice guidance states that Local Green Space designation '*is a way to provide special protection against development for green areas of particular importance to local communities*'.

As mentioned in the Local Green Space and Reserved Open Green Space Topic Paper (TPC005), two of the neighbourhood development plans in Bristol (Lawrence Weston and Hengrove and Whitchurch Park) currently designate various areas of Local Green Space.

**PQ134. Is the Council satisfied that Policy GI1 is consistent with paragraph 103 of the NPPF?**

#### Council's response

Policy GI1 'Local Green Space' is considered consistent with paragraph 103 of the NPPF September 2023 and is therefore consistent with policies for managing the Green Belt.

The policy would have the effect of retaining land as open space - keeping it specially protected against development, to use the wording of the PPG. This is consistent with NPPF Green Belt policies which have the effect of keeping land permanently open whilst setting out some allowable appropriate forms of development.

[The current consultation on changes to the National Planning Policy Framework proposes various changes to Green Belt policy. No changes are proposed to the policies for Local Green Space.]

***PQ135. Are any areas of proposed LGS already identified as Green Belt? If so, could the Council provide a list of any affected areas and explain what additional local benefit would be gained by designation as a LGS?***

Council's response

The Local Green Space and Reserved Open Green Space Topic Paper (TPC005) refers to LGS in Green Belt.

There are 10 Local Green Spaces which are in the Green Belt, these are:

- Conham Vale and Dundridge Farm Woodland SNCI LGS29005
- Highridge Green LGS16001
- Bedminster Down Common (N) LGS05002
- Ashton Fields LGS03001
- Avon Valley, Eastwood LGS06003
- Ashton Court LGS03004
- Stockwood Road Open Space LGS31005
- Stockwood Open Space LGS31006
- Crosscombe Drive Open Space LGS16012
- Stapleton Allotments and Holdings (designated in Policy GI4)

The Topic Paper (TPC005) explains that land already identified as Green Belt was only proposed as Local Green Space if it was seen to have an additional local benefit, in line with the NPPG. This is set out on page 4, bullet point 4 of the Topic Paper.

This additional benefit was deemed to have come about through recognising that the spaces have the characteristics of a Local Green Space (e.g. Beauty, Recreational Value, Tranquillity, Historic Significance and Richness of Wildlife.) Therefore, the sites designated differed from other areas of the Green Belt and therefore it was appropriate to designate them as Local Green Space.

All Local Green Space designations in the Local Green Space and Reserved Open Green Space Topic Paper (TPC005) are displayed in Appendix 1, pages 15-19. Within this Appendix it shows the 'Values of Local Green Space', these being Beauty, Recreational Value, Tranquillity, Historic Significance and Richness of Wildlife. The Local Green Spaces that are also Green Belt were assessed against these criteria and were deemed to have met them and therefore they are appropriately proposed as Local Green Space. The Local Green Spaces that are in the Green Belt and their LGS values are shown below.

NAME	REFERENCE	Values of Local Green Space				
		Beauty	Recreational Value	Tranquility	Historic Significance	Richness of Wildlife
Conham Vale and Dundridge Farm Woodland SSCI	LGS29005					
Highridge Green	LGS16001					
Bedminster Down Common (N)	LGS05002					
Ashton Fields	LGS03001					
Avon Valley, Eastwood	LGS06003					
Ashton Court	LGS03004					
Stockwood Road Open Space	LGS31005					
Stockwood Open Space	LGS31006					
Crosscombe Drive Open Space	LGS16012					

***The PPG<sup>11</sup> states that the LGS designation should only be used where the green area is not an “extensive tract of land”.***

***PQ136. How has the Council determined what constitutes an “extensive tract of land” and how has this factored into the assessment of potential LGS?***

#### Council’s response

The NPPF September 2023 states in paragraph 102 (c), that a Local Green Space designation should only be used where a green space is *‘local in character and is not an extensive tract of land’*.

The National Planning Policy Guidance attempts to elaborate the meaning of the undefined ‘extensive tract’ provisions of the NPPF by stating that there is no hard and fast rule for how big a Local Green Space can be but that it should not be an extensive tract of land. The PPG goes on to attempt to explain the purpose of the ‘tract’ reference. It is stated that blanket designation of open countryside adjacent to settlements will not be appropriate. It explains designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.

These matters have been addressed in the Local Green Space and Reserved Open Green Space Topic Paper (TPC005). Page 9 explains how the council has interpreted whether a space is ‘local in character’. All the proposed Local Green Spaces in the local plan are considered to be consistent with the ‘extensive tract’ provisions of the NPPF. No designation is considered to be a blanket designation of open countryside and none are considered a back door way of trying to achieve a new area of Green Belt by another name.

<sup>11</sup> ID 37-015-20140306

### **Managing flood risk**

**The Environment Agency's representations refer to the running of additional Bristol Avon Flood Strategy (BAF) modelling, with the results being available in March.**

**PQ137. Could the Council explain the significance of this modelling for the Plan, if any? Could the Council confirm whether it has been completed?**

#### Council's response

The availability of updated modelling does not have an immediate substantive impact on the local plan.

Updated modelling will contribute to the continued development of the emerging [Bristol Avon Flood Strategy](#) as referenced in policy FR2 'Bristol Avon Flood Strategy' and will be brought into the scope of policy FR1 'Flood risk and water management' through the usual process of updating the Strategic Flood Risk Assessment.

Policy FR2 'Bristol Avon Flood Strategy' applies to development in any area that benefits from a reduction in flood risk by the future delivery of the Bristol Avon Flood Strategy. It sets clear development requirements in relation to that strategy. Policies DS2 'Bristol Temple Quarter', DS3 'St. Philip's Marsh' and DS4 'Western Harbour', which relate to the development strategy areas most directly affected by the strategy, all make appropriate cross-references to policy FR2.

### **Policy FR1 – Flood risk and water management**

**Paragraph 12.2.6 of the Plan refers to there being sufficient capacity in Flood Zone 1 such that sites lying in undefended Flood Zone 3 will not be required to meet the target of 1,925 dwellings per year.**

**PQ138. Could the Council explain what is meant by the first bullet point in paragraph 12.2.6? Is it accurate that no development outside Flood Zone 1 would be needed to meet housing needs? In addition, is this suggesting that any housing development outside Flood Zone 1 would not be capable of meeting the sequential or exception tests?**

#### Council's response

The text in paragraph 12.2.6 incorrectly states that there is sufficient capacity in flood zone 1.

Some development is proposed in areas at risk of flooding, for instance where flood defences are proposed, as set out in the Flood Risk Topic Paper (TPC002). As set out in the topic paper, the level and distribution of development set out in the local plan is considered to pass the sequential test.

A suggested modification has been added to the Schedule of Suggested Main Modifications (EXA002) to delete the incorrect paragraph, which is not required for the interpretation and application of policy FR1:

Policy FR1, paragraph 12.2.6:

~~12.2.6 The level and distribution of development set out in the local plan is considered to pass the sequential test. In short, however:~~

- ~~Since there is sufficient capacity in Flood Zone 1, development of sites lying in undefended Flood Zone 3 as existing or with climate change will not be required in order to meet the target of 1,925 homes per year.~~
- ~~It is not proposed to designate greenfield sites for industrial and warehousing use where that land is at undefended risk of flooding and does not already benefit from planning permission.~~
- ~~Some office development may be necessary on land at risk of flooding in the city centre in order to meet identified employment development needs, given that there are insufficient sites on Flood Zone 1 either in the city centre or elsewhere in the city that would accord with the approach to locating main town centre uses as set out in national planning policy and would therefore be considered 'reasonably available' for the purpose of the Sequential Test as set out in national policy.~~

## **Transport**

### **Policy T2 – Transport Infrastructure Improvements**

**Several improvements to the city's transport system are listed in Policy T2, which are identified as contributing to matters such as accessibility and supporting development proposed in the plan. The reasoned justification to this policy refers to the need for a refreshed JLTP4 and other documents, such as Local Walking and Cycling Infrastructure Plan (2020)**

**PQ139. Are there any specific schemes or commitments in place to deliver the improvements identified in the policy?**

#### Council's response

There are various commitments in place for specific schemes and some recent completions. These are noted below:

*Enhancements to public transport infrastructure and corridor improvements to improve strategic bus services*

1. A4018/A37 – city centre element in delivery and north and south section in development (Outline Business Case)
2. A4 Portway in development (Outline Business Case)
3. A38 south – Bedminster Green in delivery and southern section in development (Outline Business Case)
4. M32 strategic corridor – in development (Outline Business Case)
5. A370 Cumberland Basin - in development (Outline Business Case)
6. A4 Bath Road/West Town Lane to Hicks Gate - in development (Outline Business Case)
7. City Centre network – in development (Outline Business Case)
8. Ashley Down rail station – in delivery
9. Portway Park and Ride railway station – completed and opened Summer 2023

### *A proposed mass transit network*

- The mass transit proposals are part of the FUTURE4WEST scheme which was contained within the Transport Infrastructure Projects report which sought approvals to progress key schemes and went to the West of England Combined Authority Committee meeting on 26th July 2024. The relevant recommendation sought approval of the Strategic Outline Case (SOC) and noted that officers will prepare a proposal for a decision by Committee in September to enable the progression to Outline Business Case (OBC) stage of overground route options, including the drawdown of the remaining funds allocated to FUTURE4WEST. The next committee meeting will be held on 20th September 2024.

### *Expanded metrobus network*

- A38 south;
- M32 and City Centre Improvements as listed above which benefit the metrobus network

### *Walking and cycling improvements*

- Park Row – in delivery
- Old Market Gap – in delivery
- East Bristol Liveable Neighbourhood – in delivery
- Victoria Street – in development
- Old Market Quietway – in development
- Temple Way – in development
- Concorde Way (south) – in development
- Deanery Road – in development
- Filwood Quietway – in development
- Malago Greenway – in development
- Portway A4 – in development
- Bath Road A4: West Town Lane to Hicks Gate – in development
- South Bristol Liveable Neighbourhood – in development
- City Centre Network (various) – in development

***PQ140. Are the documents listed in the reasoned justification up-to-date. Furthermore, what impact, if any, will a refreshed JLPT4 have on the requirements of these documents and the delivery of the items listed in the policy?***

### Council's response

These are the documents referred to in the local plan with their relevant dates:

- Bristol Transport Strategy (published: 2019; period: 2019-2036) (REL007)

- The Local Walking and Cycling Infrastructure Plan (published: 2020; period: 2020-2036) (REL004)
- Bus Service Improvement Plan (2021) (REL005)
- [City Centre Framework \(2021\)](#) (this can be added to the examination library)
- JLTP4 (published: 2020; period: 2020-2036) (REL003)
  - The JLTP5 is currently in development and will build on the work undertaken in the JLTP4. It will provide additional focus on measures required to achieve a carbon neutral transport system as well as review planned improvements and policies to ensure they remain fit for purpose 5 years after the JLTP4 was adopted.

The JLTP5 will build upon the core policy principles contained within the documents listed above including- for example- promoting economic growth, encouraging better placemaking, improving air quality and delivering against decarbonisation targets.

The Bristol Transport Strategy focuses the Joint Local Transport Plan down to city level. It sets out the ambition and vision for transport in the city.

The other documents listed above are plans which sit within the policy framework. The schemes within these plans are currently being developed and delivered with government funding and there are no immediate plans to revisit these documents, with the exception of the Bus Service Improvement Plan which is required to be updated.

### ***Policy T3A – Transport Development Management***

***Policy T3A sets out the transport and traffic considerations that development proposals should address.***

***PQ141. Would compliance with this policy be dependent upon the delivery of the improvements identified in Policy T2?***

#### Council's response

It is not dependent upon the delivery of improvements identified in Policy T2 'Transport infrastructure improvements', however, the policy approach in the local plan provides sufficient opportunities for appropriate mitigation to be sought on a case by case basis. The council would seek contributions towards transport infrastructure improvements where appropriate.

### ***Policy T4A – Parking, servicing and the provision of infrastructure for electric vehicles***

***Paragraph 108 of the NPPF states that maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport.***

***PQ142. What is the status of the Transport SPD referred to in Policy T4A and would the approach set out in the policy be consistent with Paragraph 108 of the NPPF?***

Council's response

The Transport SPD is a proposed SPD. It will contain standards for parking provision including, for example, provision that may be necessary for people with disabilities, cycle parking and electric vehicle charging approaches.

The approach set out in the policy is considered to be consistent with paragraph 108 of the NPPF. The policy does not set maximum parking standards but aims to ensure that an appropriate level of safe, secure, accessible and usable parking is provided having regard to parking standards and other matters. The majority of the city is accessible and well served by public transport; the policy's approach to parking acts to encourage the use of sustainable and active transport, improve air quality and enable the efficient use of land.

***Policy T4A covers, amongst other points, the provision of electric vehicle charging points. However, electric vehicle charging points are covered by Part S of the Building Regulations (updated in December 2021), which took effect on 15 June 2022.***

***PQ143. Could the Council confirm what the implications of this are for the policy, if any?***

Council's response

Part S of the Building Regulations, which covers the infrastructure for Electric Vehicle charging, applies only to on-site infrastructure delivery for newly built residential and non-residential development, as well as major redevelopment projects and change of use. It does not apply to on-street parking provision, which can form a significant part of development parking provision. The Bristol Local Plan Policy T4A 'Parking, servicing and the provision of infrastructure for electric vehicles' addresses EV charging overall including making provision for EV charging infrastructure on the public highway.

***Community Facilities***

***Policy CF1 – Provision of community facilities***

***Policy CF1 sets out several criteria applicable to the provision of community facilities in new developments.***

***PQ144. Could the Council explain the justification for the figure of a minimum of 10% of floorspace being made available at an affordable rent?***

Council's response

A similar approach has been taken in the City Centre Development and Delivery Plan Part A (DDP), November 2023 (EXA008), which sets out that the council have a strategy to secure 10% of ground floor community and cultural uses with affordable rents in new developments. This is found on page 42, where the DDP states:

*'Identifying and negotiating provision for new, purpose-built community and cultural spaces delivered through new development, with a strategy to secure 10% of new ground floor development for community and cultural use, with affordable rents, protected in perpetuity.'*

The 10% figure in the DDP was informed by soft market testing on live planning applications. The DDP has been through a consultation process. This is considered an appropriate and proportion for Policy CF1 'Provision of community facilities'.

A suggested modification to paragraph 3 of the policy text has been added to the Schedule of Suggested Main Modifications (EXA002) to clarify that a proportion of ground floor space will be sought with the specific proportion referred to in additional explanatory text:

Policy CF1, policy text, 3<sup>rd</sup> paragraph:

Where major developments would generate a need for new or extended community facilities ~~they will be expected to provide~~ the council will seek a proportion minimum of 10% of ground floor space suitably fitted out for the use of community and/or cultural organisations and groups and made available at an affordable rent.

Policy CF1, insert new paragraph after para.11.7:

11.7A Where ground floor space is sought in accordance with this policy, the aim will be for the proportion to be 10% of the overall space depending on the scheme, its location and the identified needs.

## ***Design and Conservation***

### ***Policy DPM1 - Delivering well-designed places***

***PQ145. What is the definition of major development as set out in the 2<sup>nd</sup> paragraph of policy DPM1?***

#### Council's response

In this context major development has the meaning used in the NPPF (September 2023). This is the meaning of 'major' in other local plan policies unless a specific scale is identified by a policy or its explanation.

It is suggested this definition is incorporated into the policy's explanation. A suggested modification has been added to the Schedule of Suggested Main Modifications (EXA002) as shown below:

Policy DPM1, end of paragraph 13.1.9, add the following wording:

Major development for the purposes of this policy is defined as residential development of ten or more dwellings, or where the number of dwellings is not known, a site area of 0.5ha or more, or non-residential development of over 1,000m<sup>2</sup> or 1ha or more.

It is also noted that the use of 'major applications' in the policy may also benefit from a modification for clarification – i.e. major applications development proposals. A suggested modification has been added to the Schedule of Suggested Main Modifications (EXA002) as shown below:

Policy DPM1, policy text, 2<sup>nd</sup> para:

Major applications development proposals will be expected to show how the design of development has been informed by early, proactive and effective engagement with the community and how proposals have responded to the results of that engagement.

*Suggested modification to DPM1 regarding use of 'beautiful'*

In response to the government's proposed removal of references to 'beautiful' in the NPPF, a modification is suggested to remove the two references made in the local plan.

This amendment would not materially affect the application of the policy under the examination NPPF (September 2023) but would help to avoid a future inconsistency with the NPPF as proposed to be revised. Suggested modifications have been added to the Schedule of Suggested Main Modifications (EXA002) as shown below:

Paragraph 13.1.1:

~~As set out in the National Planning Policy Framework, t~~The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.

Policy DPM1, policy text, 1<sup>st</sup> paragraph, 1<sup>st</sup> bullet:

Deliver high quality, beautiful, safe, healthy and sustainable buildings and places;

***PQ146. What is the meant by 'co-ordinated development' in respect of this policy and in what way do the Council expect this to be implemented?***

Council's response

The section titled 'Co-ordinated development' in this policy uses the same wording as the second paragraph of existing local plan policy DM27 'Layout and form' - Site Allocations and Development Management Policies Local Plan (DPD002).

It is expected that implementation of the policy would continue in the same way as now, with these matters generally addressed through the development management process, in particular through design and access statements.

***PQ147. In relation to the section on 'Public art and cultural activity', this sets out three thresholds for requiring development to provide public art or cultural activity. What is the evidence for these thresholds? Have the thresholds been considered as part of the Viability Assessment of the Plan?***

Council's response

The current wording is unclear and is not intended as three separate thresholds. The intended policy threshold of DPM1 'Delivering well-designed, inclusive places' is proposals of over 100 dwellings or non-residential development of over 1,000m<sup>2</sup> and which either:

- I. Are open to the public or interact with significant areas of public realm;  
or
- II. Create significant areas of public realm.

Development over this threshold will be expected to demonstrate how the provision/promotion of public art and cultural activity has been addressed.

A main modification is proposed to clarify the thresholds. A suggested modification has been added to the Schedule of Suggested Main Modifications (EXA002) as shown below:

Policy DPM1, policy text, section 'Public art and cultural activity':

New development should enable the delivery of permanent and temporary public art and other cultural activity.

This provision applies to development proposals which are over 100 dwellings or non-residential development of 1,000m<sup>2</sup> or more and which either:

- i. Are open to the public or which interact with significant areas of public realm; or
- ii. Create significant areas of public realm.

Development proposals that meet this threshold will be expected to demonstrate how the provision/promotion of public art and cultural activity has been addressed.

#### *Viability*

Public art provision through policy has been incorporated into the Bristol Local Plan since 1997. The current policy BCS21 'Quality Urban Design' Core Strategy (DPD001) has typically been secured through its incorporation into the design of development rather than through any financial contribution and so has not been separately considered by the council's viability assessment, being considered as an integral part of the wider design of development as this already includes design considerations.

#### *Current local plan policy*

Policy BCS21 'Quality Urban Design' Core Strategy (DPD001) of the existing local plan expects major development to enable provision of permanent and temporary public art. The policy text expects new development to 'enable the delivery of permanent and temporary public art' with the explanation text further adding that that the requirement applies to major development schemes (those over 10 dwellings or 1,000m<sup>2</sup>). Policy DPM1 indicates a revised threshold for residential of 100 or more.

***PQ148. A number of the design policies refer to the Council's Urban Living SPD. What is the age of this SPD and does it refer to existing local plan policies? What specific guidance on standards does it provide?***

#### Council's response

The Urban Living SPD: Making Successful Places at Higher Densities (EXA020) was adopted in November 2018. The guidance refers to existing local plan policies.

It is intended to support achieving optimal densities for new development balancing the efficient and effective use of land with aspirations for a positive response to context, successful placemaking and liveability. The SPD provides guidance for all residential development, major development, major residential development and for tall buildings both in the form of general principles of design and compliance tools as well as more quantitative information and standards. It provides a range of guidance aimed at delivering successful places at higher densities. This includes guidance on outdoor space, internal layout, aspect, shared access and internal space, blocks and street design and for tall buildings (30m/10+ storey) on visual quality, functional quality and environmental quality.

**Policy DC1 - Liveability in residential development including space standards, aspect and private outdoor space**

**PQ149. How will a 'liveable environment' as set out in the 3<sup>rd</sup> paragraph of the policy be assessed?**

Council's response

Policy DPM1 'Delivering well-designed, inclusive places' refers to liveability considerations under the heading 'urban living', stating that development should seek to optimise densities, balancing the efficient use of land with liveability considerations. It refers to a number of factors that contribute to liveability:

*'Liveability considerations should ensure an attractive environment for users by providing dwellings with adequate accessibility, natural lighting, ventilation, privacy, outlook and amenity, and communal spaces with sufficient natural light and ventilation as set out in the Urban Living SPD.'*

The term liveability or liveable environment can be read as having a similar meaning to 'safe and healthy living conditions' and covers the matters referred to above.

Policy DC1 'Liveability in residential development including space standards, aspect and private outdoor space' addresses liveability directly and is intended to ensure that residential development achieves a liveable environment for future occupiers. Paragraph 3 of the policy sets out the overall principle that development that does not provide a liveable environment will not be permitted.

A liveable environment is one which addresses the three matters directly referred to in the policy – internal space, aspect, private outdoor space. It is also one which is consistent with the matters addressed in DPM1 and the other relevant design policies.

The policy reflects the NPPF (paragraph 119, September 2024), which notes that local planning authorities should balance the efficient use of land with issues such as safe and healthy living conditions:

*'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.'*

**PQ150. Paragraph 13.1.20 refers to specialist forms of accommodation, what is meant by this and how will a decision maker assess whether sufficient space is to be provided?**

Council's response

The council's [Space Standards Practice Note](#) sets out the approach used in applying the nationally described space standards. The council applies the standard for most permanent new homes, including most development falling within Use Class C3 (including build to rent that provides self-contained residential accommodation) and self-contained homes that may form part of developments that fall into other use classes or are sui generis.

Specialist housing in the context of this policy refers to a range of accommodation for which the full requirements of the national described space standards are not

necessary or fully applicable. This includes accommodation designed for short term occupancy and/or identified occupier groups (detailed in [Appendix A](#)) as residents may not require the total floor areas and other requirements identified in the NDSS and/or may be able to use shared amenities and communal spaces. This would include build to rent housing in a shared living format such as co-living and intergenerational/multigenerational shared housing.

Details of how the NDSS is or is not applied to residential development defined as specialist forms of accommodation can be found in [Appendix A](#) of the existing Space Standards Practice Note. This appendix also sets out how an assessment of whether sufficient space has been provided to occupants in this specialist housing. It is intended that this approach will continue to be used.

The practice note can be added to the examination library.

**PQ151. Does the Council consider that the provision of communal gardens would fall within the scope of open space and provide an explanation accordingly?**

Council's response

Provision of communal gardens does not fall within the scope of open space of public value as very broadly defined/described in the NPPF September 2023 (NPPF Annex 2 – ‘Open space: all open space of public value...’).

Policy DC1 ‘Liveability in residential development including space standards, aspect and private outdoor space’ sets out a requirement for development to incorporate private outdoor space for new homes intended for permanent or long-term occupation. Communal gardens are a form of private outdoor space. They are private to the development, being accessible to the residents of the development. As Policy DC1 explains they may be provided where individual private outdoor spaces are not feasible.

Private outdoor space (which includes private communal gardens) is not the same as open space for recreation which is intended to be publicly accessible. This is covered separately in policy GI A ‘Open space for recreation’.

A modification is suggested for paragraph 13.1.22 so that it properly makes reference to outdoor space, consistent with the policy wording itself and the policy title. A suggested modification has been added to the Schedule of Suggested Main Modifications (EXA002) as shown below:

Policy DC1, paragraph 13.1.22:

13.1.22 Private ~~open~~ outdoor space can make an important contribution to quality and liveability of new housing developments. Private and communal ~~open~~ outdoor space should be designed to be safe, accessible, inviting and well used, without the fear of crime. It should encourage an appropriate sense of ownership and should be managed to ensure that it remains useful and welcoming to all residents. Where appropriate this should creatively integrate opportunities for children’s play. The council’s SPD on urban living provides guidance on the appropriate size and design of private and communal outdoors spaces.

## **Policy DC2 - Tall Buildings**

**PQ152. Has the Council undertaken any form of tall buildings assessment or study to inform policy DC2?**

### Council's response

The council has not undertaken a tall buildings assessment or study as part of preparing policy DC2 'Tall buildings'.

The Urban Living SPD: Making Successful Place at Higher Densities 2018 (EXA020), which has an accompanying evidence base, provides specific guidance on tall buildings. It replaced an earlier SPD for Tall Buildings (January 2005).

**PQ153. The 4<sup>th</sup> paragraph of policy DC2 refers to proposals being accompanied by sufficient information on which to assess their impact. What information would be required?**

### Council's response

Paragraph 13.1.29 of the policy explanation text states Landscape and Visual Impact Assessment (see PQ155 below) will be necessary and that an assessment of any impacts on local micro-climate should be incorporated as part of the Design and Access Statement.

Additionally, applications for tall buildings would be accompanied by any other assessments expected under other relevant local plan policies.

**PQ154. Paragraph 3.1.26 provides a definition of tall buildings, could the Council please indicate why this definition is not included within the policy?**

### Council's response

The definition of tall buildings for the purpose of the policy is in the first part of the policy's explanation text (paragraph 13.1.26). This section is used for definitions or applicability in other policies in the local plan such as in this case.

**PQ155. Paragraph 13.1.29 refers to a requirement for Landscape and Visual Impact Assessments, is it intended that these should be submitted as part of any planning application?**

### Council's response

It is intended that Landscape and Visual Impact Assessments would be submitted as part of planning applications, continuing current practice.

A main modification is suggested to clarify that LVIAs should be submitted (the revised wording based on current local plan (DPD002) page 55):

Policy DC2, paragraph 13.1.29:

13.1.29 Landscape and Visual Impact Assessments should be submitted for applications for tall buildings ~~will be necessary~~ to enable the visual impact of tall buildings from near and distant viewpoints to be assessed.

## **Policy CHE1 - Conservation and the historic environment**

### **PQ156. Why does Policy CHE1 not refer to the Buildings at Risk Register?**

#### Council's response

The Buildings at Risk Register catalogues designated heritage assets that have been assessed by Historic England as at risk. Policy CHE1 sets out an approach to conserving all heritage assets, with specific reference to listed buildings, scheduled monuments, conservation areas, archaeology, and historic parks and gardens. The policy would necessarily apply proposals affecting buildings on the at risk register and require consideration of their specific conditions and significance. As such, it is not considered that a reference to the Buildings at Risk Register is essential for the effective implementation of the policy.

The relevant current local plan policies for heritage (BCS22 'Conservation and the Historic Environment' in DPD001 and DM31 'Heritage Assets' in DPD002) do not specifically reference buildings at risk or the Register in the policy.

### **PQ157. Paragraphs 13.2.5 and 13.2.9 refer to Heritage Statements as either 'may be required' or 'should be submitted with planning applications'. Does the Council consider these different approaches to be consistent and if not, which is to be preferred? If it is the latter, should this be contained within the policy as it is a specific requirement that decisions makers would need to have regard to?**

#### Council's response

The requirement for heritage statements in the current local plan is provided in the explanation section of policy DM31 'Heritage Assets' Site Allocations and Development Management Policies (DPD002) and is also listed in the [Planning Application Requirements Local List](#). This indicates that a heritage strategy should be provided where development will or is likely to impact a heritage asset and should be used to demonstrate compliance with the policy. It is considered practical and appropriate for the reference to a process expectation to be in explanatory text.

For clarification, a modification could be made to remove the initial reference in paragraph 13.2.5. A modification could also be made to paragraph 13.2.9 to clarify that heritage statements will be required only when a planning application will or is likely to impact a heritage asset. Suggested modifications have been added to the Schedule of Suggested Main Modifications (EXA002) as shown below:

#### Policy CHE1, paragraph 13.2.5:

This local plan includes an objective to cherish the city's historic environment and harness the benefits of heritage sensitive regeneration. This policy sets out how the council proposed to secure the conservation and enhancement of heritage assets. It should be read in conjunction with the wider suite of design policies and the council's design guides and codes. ~~The submission of other documents such as a Heritage Statements may be required to demonstrate compliance with this policy in accordance with heritage guidance.~~

#### Policy CHE1, paragraph 13.2.9:

A heritage statement should be submitted with planning applications which will or are likely to impact heritage assets to show how the proposal addresses this policy. The

heritage statement should set out and address any impacts the proposed development may have on heritage assets.

***PQ158. Paragraph 13.2.8 refers to the Practice Guide to PPS5: Planning for the Historic Environment. Is this Guide extant?***

Council's response

This former guidance has been erroneously referred to. A main modification is suggested to instead refer to national planning practice guidance (Historic Environment) which itself links to other sources. A suggested modification has been added to the Schedule of Suggested Main Modifications (EXA002) as shown below:

Policy CHE1, paragraph 13.2.8:

The concept of the significance of an asset is an important consideration in assessing and determining applications that may affect a heritage asset. The definition of significance is given in the National Planning Policy Framework and the various means by which the significance of an asset can be measured are set out in the National Planning Practice Guidance (Historic Environment). ~~Practice Guide to PPS5: Planning for the Historic Environment.~~

***PQ159. What is the status of the Our Inherited City Heritage Statement Guidance referred to in paragraph 13.2.14?***

Council's response

[Our Inherited City Heritage Statement Guidance](#) (2020) contains guidance for applicants in preparing heritage statements. The guidance functions like a practice note, providing information on the implementation of local plan policy. It was prepared to assist developers, planners and other stakeholders engaged in projects that have the potential to impact the historic environment. It sets out guidance on the process of implementing existing local plan policy DM31 'Heritage assets' (DPD002) and BCS22 'Conservation and the Historic Environment' (Core Strategy DPD001), and signposts various resources that can be used to help assess historic assets, their significance, and the wider historic environment. The guidance will be updated to reflect the new local plan, although in practice, the policy content of CHE1 'Conservation and the historic environment' largely reflects both existing local plan policies DM31 and BCS22.

***PQ160. Paragraph 13.2.15 relating to 'energy efficiency and renewables' refers to further guidance being provided in the council's design guide. Is there a timetable to produce the design guide and will it be specific to the historic environment? Is there any relationship with paragraph 13.2.7, which also refers to design guides and codes?***

Council's response

In line with the requirement for local planning authorities to produce design guides and codes, the council intends to produce a citywide design guide. The Bristol Design Guide is in early stages of development. This guide will set out detailed requirements for design, modelled off the National Design Guide and National Model

Design Code. This design guide will include a focus section providing further guidance relating to the retrofit of historic buildings with energy efficiency and renewable energy measures. Other aspects of the guidance will address different aspects of heritage. The guidance will address all development, and not just that which impacts or involves heritage assets. The council intends for the Bristol Design Guide to be adopted concurrently with the adoption of the new local plan.

There is no direct relation between the reference in paragraph 13.2.15 and 13.2.17. Paragraph 13.2.15 refers specifically to the council's intended guidance on incorporating energy efficiency measures and renewables into historic buildings, whilst 13.2.17 refers to the wider design guide and the information it provides on heritage more broadly.

**PQ161. What is the status and age of the guidance SPD7, SPD2, PAN6 and PAN8 listed in bullets of paragraph 13.2.16?**

Council's response

The guidance documents listed in paragraph 13.2.16 are all current documents. These documents, apart from SPD2, are referred to in policy BCS22 'Conservation and the Historic Environment' (Core Strategy DPD001) and DM31 'Heritage Assets' (Site allocations and development management policies DPD002) and all of them are actively used. Two of the documents are supplementary planning documents and two are practice notes from the 1990s. The documents and their dates of adoption are listed below:

- SPD7: Archaeology and development (2006)
- SPD2: A guide for designing house alterations and extensions (2005)
- PAN6: Off-street residential parking in conservation areas (1995)
- PAN8: Shopfront guidelines (1997)

The guidance in these documents is considered to remain suitable to use in conjunction with Policy CHE1 'Conservation and the historic environment' given their specific focus and consistency with the new local plan and national planning policy. As noted in paragraph 13.2.17, the documents will remain in use until updated or replaced.

**Health, wellbeing and food sustainability**

**Policy HW2B – Health and Development**

***The requirements of Policy HW2B include a provision that developments that have an unacceptable impact upon health and wellbeing will not be permitted.***

**PQ162. The explanatory text to Policy HW2B refers to the 'Planning a healthier Bristol' practice note. Can the Council confirm the status of this document, and its contents?**

Council's response

Planning a healthier Bristol (2013) (EXA016) is a practice note that sets out the council's guidance on health impact assessments. Practice notes are used by Bristol

City Council to provide guidance on how a policy should be implemented; in this instance, it outlines when and how health impact assessments should be produced.

Existing Policy DM14 'The health impacts of development' (Site Allocations and Development Management Policies) (DPD002) is supported by this practice note.

***PQ163. How would the Council determine whether a proposed development that falls outside of the thresholds for a Health Impact Assessment would be likely to have a significant impact on health and wellbeing?***

Council's response

The policy text of Policy HW2B 'Health and development' is identical to current local plan policy DM14 'The health impacts of development' Site Allocations and Development Management Policies (DPD002) which has an established process for implementation. The explanation section has been expanded to provide further information relating to the policy's goals.

Paragraph 14.2.5 notes the need for a health impact assessment where a development falls outside the policy threshold would be dependent on various characteristics of the development such as its location, proximity to certain uses and other characteristics. As noted in paragraph 14.2.7, the Planning a healthier Bristol practice note will be updated to include further information to assist developers in determining whether an HIA is required if the policy threshold is not already triggered.

***Policy HW3 - Takeaways***

***Policy HW3 seeks to consider the impact of takeaways on young people and limit takeaways within five minutes of locations where young people may gather. Policy HW3 also states that the proposals that would result in three, or more, adjacent takeaways would not be permitted.***

***PQ164. Could the Council define the term 'young people'?***

Council's response

The policy is based on existing policy DM10 'Food and Drink Uses and the Evening Economy' Site Allocations and Development Management Policies (DPD002) which in the explanation section uses the term young people (2.10.5). The policy is intended to limit the proliferation of hot food takeaways near schools and youth facilities.

The term young people for the purpose of this policy would have the same meaning as that used in the planning practice guidance paragraph 004 (Healthy and safe communities) which says: '*Planning policies and proposals may need to have particular regard to the following issues: proximity to locations where children and young people congregate such as schools, community centres and playgrounds.*'

**PQ165. Could the Council explain the rationale for selecting the five-minute distance?**

Council's response

The 400m approximately five-minute walking distance used in policy HW3 'Takeaways' is used in the current local plan policy DM10 'Food and Drink Uses and the Evening Economy' - Site Allocations and Development Management Policies Local Plan explanation text paragraph 2.10.5 (DPD002). Five minutes is considered a short walking distance frequently used to access services. Beyond this distance, it is considered that the potential impact for hot food takeaways to influence food choices would be diminished.

**PQ166. Could the Council explain the justification for the a threshold, and the adverse effects that would emanate should this threshold be exceeded?**

Council's response

The threshold requirement in policy HW3 'Takeaways' is carried forward from current local plan policy DM10 'Food and drink uses and the evening economy' Site Allocations and Development Management Policies (DPD002). This policy also includes a threshold limiting the proliferation of takeaways in proximity to schools and youth facilities.

The Takeaways Topic Paper (TPC008) sets out the justification for the use of a threshold. It notes that national planning policy and planning practice guidance supports planning policies and decisions that enable and support healthy lifestyles. The planning practice guidance notes the proximity to locations where children and young people congregate such as schools, community centres and playgrounds can be one factor considered when seeking to promote a healthier food environment by limiting the proliferation of particular uses ([PPG, Healthy and safe communities, paragraph 004](#)).

Both the extant DM10 'Food and drink uses and the evening economy' Site Allocations and Development Management Policies (DPD002) and the proposed policy requirement are intended to limit the proliferation of less healthy food outlets in proximity to schools and other areas where it may lead to negative food choices. Takeaways within a five-minute walk of such areas would be more likely to appeal to impulse decision making due to ease of access, and so are more likely to lead to the consumption of less healthy food. Restricting the proximity of takeaways to schools or other areas where young people congregate is an approach supported by Public Health England and the National Institute for Health and Care Excellence, noting that research has shown that increased physical access to takeaway food outlets has a role in promoting unhealthy diet and obesity.

**PQ167. The policy also states that proposals should not result in a 'harmful concentration of takeaways within a retail centre'. Could the Council explain what is meant by this term? For example, does this relate to the vitality and viability of the centre as well as health matters?**

Council's response

HW3 'Takeaways' defines a harmful concentration of takeaways within a retail centre as where they constitute 15% or more of the total number of units within a town, district, or local centre or parade, or where there would be three or more takeaways adjacent to each other.

Concentrations of takeaways greater than this are likely to have a negative impact on the health and wellbeing of local communities. As noted in the response to PQ166, increased physical access to takeaway food outlets can promote unhealthy diet and obesity through proximity. An overconcentration of takeaways can also limit the number of units available for healthier food choices. The level of 15% referred to in paragraph 14.2.19 seeks to prevent areas with lower rate of takeaway occupancy from developing an overconcentration, and areas with higher rates to not worsen.

This approach is supported by the Planning Practice Guidance which notes that planning policies may need to have regard to the over-concentration of certain uses within a specified area when considering the health impacts of development (Paragraph 004 of the PPG, [Healthy and safe communities](#)).

Whilst the policy addresses issues relating to amenity impacts such as noise, odour and litter, issues relating to the vitality and viability of centres would not be addressed through this policy. These issues would be addressed through the policies in chapter 8 Centres, shopping and the evening economy.

**Food Sustainability – Policy FS1 - Allotments**

**PQ168. Can the Council explain the justification for identifying the minimum threshold of allotment provision in Policy FS1?**

Council's response

Increased population resulting from new housing development is likely to be directly related to the demand for allotments within the local authority. The council has a statutory requirement to provide sufficient number of allotments.

The approach to allotments is a continuation of the current local plan policy DM15 'Green Infrastructure Provision' Site Allocations and Development Management Policies (DPD002) with a revised threshold. The current policy is based on the council's citywide target for allotment provision of seven allotments per 1,000 residents. The policy threshold is high and rarely triggered meaning that arising need for new allotments is not being addressed sufficiently. Assuming the average occupancy of a dwelling in Bristol as a baseline for the number of residents in a new dwelling, the policy would not be triggered by any development of less than 417 dwellings and would then require provision of seven allotment plots, equivalent to 1,250m<sup>2</sup>.

The threshold in policy FS1 'The provision of allotments' reflects the longstanding targeted provision rate of 7 plots per 1,000 residents, adjusted to where development would create the need for one allotment plot (140 residents roughly equivalent to 60

dwellings). Any development is inherently likely to contribute to a deficiency in allotment provision arising from the demand for allotments from new residents. The policy aims to ensure that development contributes accordingly to mitigating any loss of provision it may cause at the lowest reasonable level: where new residents would potentially create the demand for one plot.

### **Annex – Development Allocations**

***PQ169. We may have specific questions about the allocations in due course. However, it would be useful at this stage if the Council could confirm what status it considers the Development Allocations Annex to have. Is it intended that the ‘Development Considerations’ be read as formal policy or as supporting text?***

#### Council’s response

The status and role of the Development Allocations Annex is the same as that of the Site Allocations Information Annex in the adopted Site Allocations and Development Management Policies Local Plan (2014).

New Bristol Local Policy DA1 ‘Proposed Development Allocations’ states that the development allocations will be developed for the uses identified and in accordance with the accompanying development considerations:

*‘The sites set out in the ‘Development Allocations’ annex of this plan are identified as being suitable for development and redevelopment for alternative uses.*

*The sites will be developed for the uses identified and in accordance with the accompanying development considerations and with all other relevant development plan policies.’*

This replicates Policy SA1 ‘Site Allocations’ in the adopted Site Allocations and Development Management Policies Local Plan (2014), which states:

*‘The sites listed below and shown on the Policies Map will be developed for the uses identified and in accordance with the accompanying development considerations set out in the Annex ‘Site allocations information’ and with all other relevant development plan policies.’*

## Appendix 1 - Examples from local plans referred to in response to PQs

PQ9

### Adopted [Salford Local Plan](#) January 2023

Policy AP5:

*“Masterplans/frameworks will be produced for the Eccles New Road, Liverpool Street and Cambridge employment areas, and any development within them will be expected to accord with the relevant masterplan/framework in accordance with Policy EF2. Each of these three areas will continue to be protected as an existing employment area in accordance with Policy EC1, unless such masterplans indicate otherwise.”*

Policy EF2:

*‘...No development will be permitted on sites allocated for development through the Places for Everyone joint DPD until a masterplan/ framework or Supplementary Planning Document (SPD) has been developed in consultation with the local community and other stakeholders, and is considered acceptable by the city council, or in the case of an SPD adopted, by the city council. In circumstances where a masterplan/framework is to be put forward as part of a planning application, in order to meet the requirements of criteria A), B), i), ii) and iii) early and effective engagement with the city council, and consultation with the local community and other stakeholders should take place in advance of the submission of that application and the submitted masterplan/framework must show how the whole site will be delivered.’*

### Adopted [South Gloucestershire Core Strategy](#) December 2013

Policy CS26:

*...It is essential that an area-wide adopted SPD is the policy delivery mechanism to ensure development is comprehensively planned and delivered in accordance with the vision, Policy CS25 and partnership priorities for the North Fringe communities, and high quality urban design principles as set out in Policy CS1.*

*Development proposals will be required to demonstrate that they are in accordance with the SPD. They should positively facilitate and not prejudice the development of surrounding areas of the New Neighbourhood, and meet the overall vision for the transformation of the area.*

PQ125

### London Plan March 2021

Policy S6 Public toilets:

*‘...Large-scale developments that are open to the public, and large areas of public realm, should provide and secure the future management of:*

*1) free publicly-accessible toilets suitable for a range of users including disabled people, families with young children and people of all gender identities; and*

2) free 'Changing Places' toilets designed in accordance with the guidance in British Standard BS8300-2:2018. These should be available during opening hours, or 24 hours a day where accessed from areas of public realm'

### **Adopted Lambeth Plan September 2021**

Section 6: Economic Development, Retail and Town Centre Uses:

*'The council will apply London Plan policy S6 public toilets in relation to the provision of free publicly-accessible toilets in large-scale commercial developments that are open to the public. These should include fully accessible and fully equipped changing facilities for people with disabilities and their carers.'*

PQ106

### **Adopted [Salford Local Plan](#) January 2023**

Policy F2 Social Value and Inclusion

*All development shall be located, designed, constructed and operated so as to maximise its social value and contribution to making Salford a more socially inclusive city reflecting the city council's vision and "Great Eight" priorities.*

*All major developments shall submit a Social Value Strategy at the planning application stage for the approval of the city council. A condition will be included on all relevant planning permissions to ensure the implementation of any approved Social Value Strategy, including requiring compliance with the relevant parts of the strategy to be confirmed prior to the commencement and the occupation of the development.*

*The Social Value Strategy shall identify how the development will support social inclusion and deliver social value throughout its lifecycle. This shall include demonstrating how the development will maximise its positive contribution, as relevant, to:*

- 1) Reducing inequalities in Salford and their adverse impacts on residents;*
- 2) The ability of local residents and vulnerable groups to fully participate in society;*
- 3) Inclusive places, in accordance with Policy F3;*
- 4) Economic inclusion, with positive consideration given to:
  - a) Ensuring that access arrangements cater for all needs, including maximising opportunities for walking and cycling;*
  - b) Promoting on-site employment opportunities to Salford residents;*
  - c) Providing training opportunities for Salford residents;*
  - d) Utilising local supply chains; and*
  - e) Signing up to the City Mayor's Employment Charter; and**
- 5) Good mental and physical health, in accordance with Policy HH1.*
- 6) A framework of measures will be established to assist developers in identifying how development can maximise its social value. Appropriate measures from the framework can be selected having regard to the scale and location of the proposed development and identified local needs. Further guidance on delivering social value may be developed through a supplementary planning document (SPD).*

*For the purposes of this policy, social value is defined as the range of potential social, economic and environmental benefits to communities in Salford, including existing residents, businesses and other stakeholders in the local area.*

*Major development is defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015, as amended, or any successor to it.*

## Appendix 2 – Policies referring to other documents

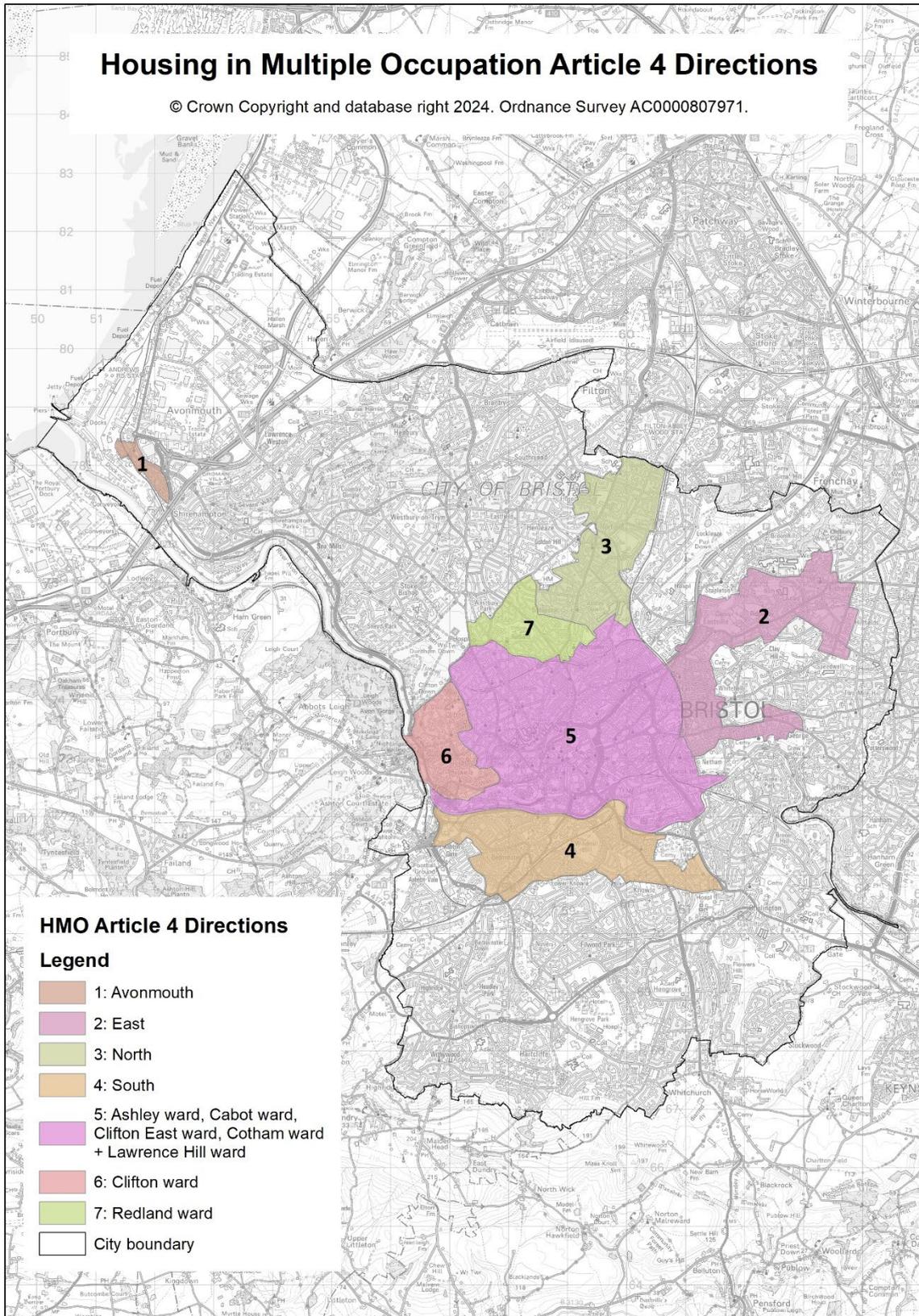
Policy & page / para no.	Extract
Policy DS1: Bristol City Centre, p.17	'Proposals will have regard to...relevant <u>Conservation Area Character Appraisals</u> and other <u>supporting policy and guidance.</u> '
Policy DS1: Bristol City Centre, p.17	'The design of development will be expected to accord with <u>local design guides and codes</u> and any design guidance within other relevant <u>city centre frameworks and strategies.</u> '
Policy DS1A: Bristol City Centre – Broadmead, Castle Park and the Old City, p.19	'...development of this area will be expected to accord with the <u>City Centre Development and Delivery Plan.</u> '
Policy DS1A: Bristol City Centre – Broadmead, Castle Park and the Old City, Policy wording, p.19,	'...the design of development will be expected to... [accord] with any <u>local design guidance or codes.</u> '
Policy DS2: Bristol Temple Quarter, p.23	'Development... to accord with any <u>approved development framework, masterplan and infrastructure delivery plan for the area</u> '
Policy DS3: St Philip's Marsh, p.26	'Development...to accord with any approved <u>masterplan and infrastructure delivery plan</u> for the area.'
Policy DS3: St Philip's Marsh, p.27	'Development will be... in accordance with the approved <u>infrastructure delivery plan.</u> '
Policy DS4: Western Harbour, p.29	'Development ...to accord with a <u>masterplan...</u> '
Policy DS4: Western Harbour, p.29	Development will be expected to provide...flood defences and flood mitigation measures in accordance with the <u>Bristol Avon Flood Strategy.</u> '
Policy DS5: Frome Gateway, p.32	'Development of Frome Gateway will... accord with a <u>regeneration framework.</u> '
Policy DS6: Lawrence Hill, p.36	'Development... will... accord with a <u>regeneration framework</u> which will coordinate the approach to development across the area and the relationship with surrounding locations.'
Policy DS7: Central Fishponds, p.39	'Development of Central Fishponds will... accord with a <u>regeneration framework</u> which will coordinate the approach to development across the area and the relationship with surrounding locations.'

Policy & page / para no.	Extract
Policy DS8: Central Bedminster, p.44	‘Development of Central Bedminster will... accord with <u>regeneration frameworks</u> which will coordinate the approach to development across the area and the relationship with surrounding locations.’
Policy DS9: Brislington, p.46	‘Development of Brislington will...accord with a <u>regeneration framework</u> which will coordinate the approach to development across the area and the relationship with surrounding locations.’
Policy DS11: Development allocations – south west Bristol, p.52	‘Development at Elsbert Drive should be in accordance with a detailed <u>cross-boundary development framework or master plan</u> prepared in consultation with the local community...’
Policy DS12: New neighbourhood – Bath Road, Brislington, p.53	‘Development should be in accordance with a detailed <u>development framework or master plan</u> prepared in consultation with the local community...’
Policy IDC1: Development contributions and CIL, p.61	‘The approach to other contributions is set out in its <u>planning obligations supplementary planning document.</u> ’
Policy H4: Housing type and mix, p.75	‘Within areas of growth and regeneration as set out in the Development Strategy an appropriate proportion of homes of various sizes will be sought in accordance with the provisions of those policies and <u>any relevant supplementary planning documents, masterplans or spatial frameworks.</u> ’
Policy BTR1: Build to Rent housing, p.91	‘The appropriate mix of build to rent homes... should be determined in accordance with...any guidance relating to controls on the proportion of build to rent development that <u>may be set out in relevant future supplementary planning documents, masterplans or spatial frameworks.</u> ’
Policy BTR1: Build to Rent housing, p.91	‘The council’s <u>Affordable Housing Practice Note: Delivery of Affordable Build to Rent Homes in Bristol</u> provides guidance on the implementation of this policy.’
Policy E6: Affordable workspace, p.108	‘The provision of affordable workspace will be required in areas identified in the <u>Affordable Workspace SPD...</u> ’
Policy GI A: Open space for recreation, p.136	‘Development will be expected to ensure that ...in accordance with the guidelines set out in the council’s <u>strategies.</u> ’

Policy & page / para no.	Extract
Policy T4A: Parking, servicing and the provision of infrastructure for electric vehicles, p.147	'In accordance with the standards and guidance contained within the <u>Transport SPD</u> , development proposals will be expected to...'
Policy T4A: Parking, servicing and the provision of infrastructure for electric vehicles, p.147	'Development proposals which include parking facilities will be expected to... in accordance with the standards set out in the <u>Transport SPD</u> .'
Policy T4A: Parking, servicing and the provision of infrastructure for electric vehicles, para 10.38	'Developments will be expected to meet the requirements of the <u>Transport SPD</u> for the provision of a suitable network of EV charging facilities on- and off-street...'
Policy CF2: Retention of community facilities, para	'The latter should be undertaken in accordance with the <u>guidelines on the carrying out of marketing</u> which are available to view on the council's website under planning advice and guidance.'
Policy DPM1: Delivering well-designed, inclusive places, p.183	'Consistent with national guidance and <u>any published local design guides and codes</u> , development will be expected to...'
Policy DPM1: Delivering well-designed, inclusive places, p.185	'Liveability considerations should ensure...as set out in the <u>Urban Living SPD</u> '.
Policy DPM1: Delivering well-designed, inclusive places, p.185	Proposals will be expected to be consistent with the council's <u>published design guides and codes</u> . Regard should also be had to <u>masterplans and spatial frameworks</u> where they contain considerations relating to design.
Policy DC1: Liveability in residential development including space standards, aspect and private outdoor space, p.187	'Proposals should follow the guidance set out in the council's supplementary planning document ' <u>Urban Living: Making Successful places at Higher Densities</u> ' and the council's <u>design guides and codes</u> .'
Policy DC1: Liveability in residential development including space standards, aspect and private outdoor space, p.187	'The size and design of private and communal outdoor and play space should follow the guidance set out in the council's <u>supplementary planning document 'Urban Living: Making Successful Places at Higher Densities</u> .'
Policy DC2: Tall buildings, p.189	Proposals will be expected to conform with ...the council's <u>supplementary planning document 'Urban Living: Making Successful Places at Higher Densities</u> '.

Policy & page / para no.	Extract
Policy DC4: Recycling and refuse provision in new development, p.192	‘The specific standards for this provision at time of adoption can be found in the <u>‘Waste and Recycling Storage and Collection Facilities’ Guidance for Developers of Residential, Commercial and Mixed-Use Properties</u> (March 2022). Any updates to this guidance should be reflected in development proposals.’
Annex – Development Allocations: p.71 (SA608)	‘Regard will be had to the additional considerations set out in <u>SPD3</u> in considering any proposals for this site.’
Annex – Development Allocations: p.73 (SA610)	‘Regard will be had to the additional considerations set out in <u>SPD3</u> in considering any proposals for this site.’
Annex – Development Allocations: p.75 (SA612)	‘Regard will be had to the additional considerations set out in <u>SPD3</u> in considering any proposals for this site.’
Annex – Development Allocations: p.255 (BSA1101)	‘Development proposals should have regard to the <u>Enterprise Zone’s Spatial Framework</u> .’
Annex – Development Allocations: p.139 (BSA0502)	‘be led by a <u>masterplan</u> for the site to be guided by community involvement. The <u>masterplan</u> should consider the wider area, including nearby sites BSA0501 and BAS0503, and adopt a heritage-led approach identifying the key listed buildings and structures and other heritage assets to be retained.’
Annex – Development Allocations: p.187 (BDA2401)	‘Be supported by a <u>masterplan and design code</u> , which are informed by a landscape and visual impact assessment and heritage impact assessment;’

### Appendix 3 - Map of Article 4 direction areas



## **Appendix 4 – Affordable Workspace Evidence Note**

### ***Introduction***

The cost of workspace in Bristol is particularly high relative to other authorities within the West of England area and provision of affordable workspace is important to ensure that individuals, organisations and businesses can access a range of employment spaces at affordable rates and on flexible terms for economic, social and cultural purposes.

Ensuring such spaces are available alongside more traditional employment space assists in boosting the city's economic strength and diversity. Affordable workspace can provide opportunities to create places of innovation and enterprise that support the evolution of Bristol's economy, including its social enterprises and priority sectors as they emerge and are identified. In addition to delivering community benefits, such spaces support placemaking from early stages of mixed-use development.

### ***Role of affordable workspace in supporting the vibrancy of Bristol's economy, places and communities***

Over the past decade, flexible or open workspace has become an increasingly important component of commercial property markets across the UK. Workspace is now broadly recognised for the important role that it plays in nurturing and shaping local economic vitality.

The value of workspace covers a broad range of economic, social, cultural, environmental and commercial considerations. Some of these relate to on-site activities, while others relate to wider impacts catalysed off-site. In reality, the amount and nature of value supported will vary from one workspace to the next. Most workspaces operate on a spectrum from fully commercial models (such as serviced offices) to more socially-focused models (social enterprise/charity operated spaces), and blends of the two between these.

Ensuring such spaces are available alongside more traditional employment space will help boost the city's economic strength, diversity and resilience, and will help to establish and support a culture of enterprise in Bristol. Affordable, accessible workspace provides opportunities to create places of innovation and enterprise that will support the evolution of Bristol's economy, including its social enterprises and new priority sectors as they emerge and are identified. In addition to delivering community benefits, such spaces can be key to placemaking, for example within the early stages of mixed-use development.

### ***Supporting economic resilience***

Affordable workspace can support economic development through the support it provides to businesses and entrepreneurs. Affordable workspace:

- Supports entrepreneurs and start-ups to launch; and
- Enables businesses to incubate and grow, before moving onto standard commercial space.

### ***Supporting sector growth***

An affordable physical space can lead to collaboration between businesses, thereby strengthening the local business community and bolstering economic development. This can:

- Facilitate clustering and co-location of related sectoral activities; and
- Provide a platform for networking and knowledge sharing.

As workspaces typically cater for similar types of organisations or have a particular sector focus, clustering of these sectors in affordable workspaces can enable the economic benefits of working in proximity.

#### *Role of affordable workspace in supporting high street vitality*

Where it is provided within centres, affordable workspace can positively affect town centre or high street vitality by bringing additional workers to the area who in turn use local amenities and boost local spending through business-related and leisure spending. Although associated with daytime activity, increased town centre footfall could lead to greater demand for existing or new evening amenities which would help generate or sustain Bristol's night-time economy. Where town centre workspaces are generalised (i.e. not sector-specific) they can also contribute to economic diversity.

#### *Supporting thriving new communities*

Both within and outside of town centres, workspace that occupies previously underused or unused buildings presents a range of benefits:

- It can reactivate parts of town centres that may not have had much activity previously (with some of the wider economic benefits as noted above);
- Landlords can generate and receive steady income;
- businesses have a place to grow and local networks can develop;
- the local authority can receive more business rates which help fund front-line services; and
- refurbishing existing buildings is increasingly preferred to demolish and rebuild, with positive implications for managing embodied carbon implications and often reducing the need for long planning and construction lead times.

Furthermore, 'meanwhile' (temporary) workspace on sites awaiting (re)development can have similar benefits. For local authorities and developers, it can animate spaces and provide a visible sign of progress—and even help change perceptions about an area. For developers and landowners, meanwhile activity can generate vibrancy and vitality (and potentially help change perceptions about an area), while also giving some security and reducing the cost of keeping an empty site.

*Affordable workspace evidence of need*

*Affordability*

While Bristol is characterised as being one of the UKs strongest economies, its property market currently faces a number of challenges – a key one being affordability. Prices are going up across all typologies; in 2022, Bristol’s office market saw record prime rents within the city centre at £42.50 per sq ft. The city’s industrial market has seen similar increases in rents and values over the past year, with a year-on-year rental growth upwards of 30% in some cases, compared to its typical range of 5-10% (Bristol Employment Land Review, June 2023, EVVEE02).

Overall, the average price per sqft for office space across Bristol is around £29.38/sqft and £11.33 for industrial and £7.47/sqft for light industrial (CoStar, 2023). All property types have seen increases in rental values in recent years (Figure 1).

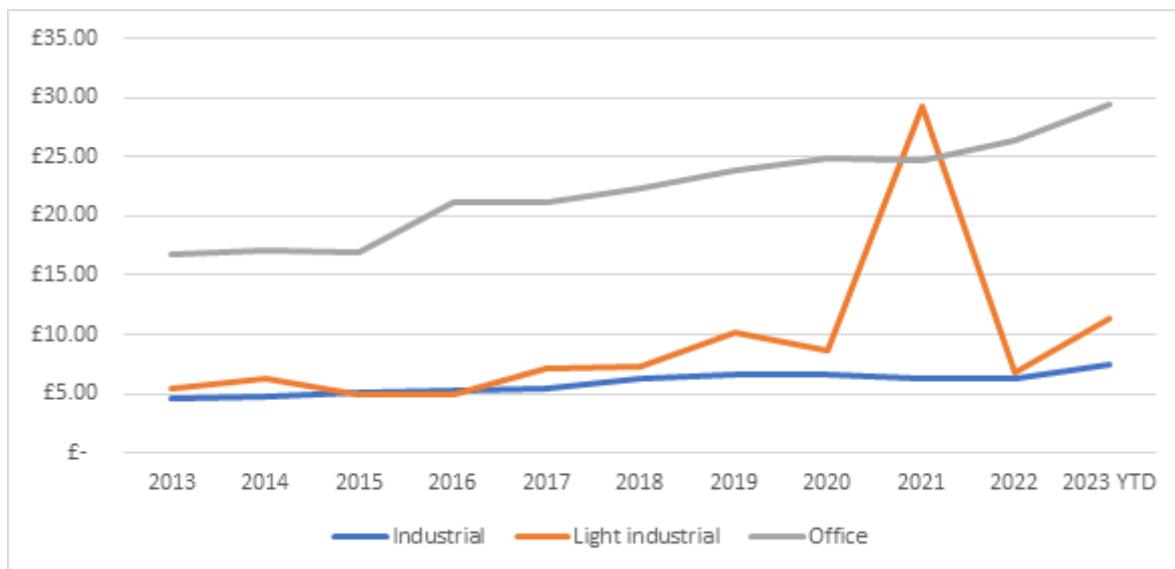


Figure 1: Rental values per sqft by type, Bristol (CoStar, 2023)

*High demand*

After lower rates of office take-up due to COVID-19 in 2020-2021, take-up in the city has rebounded to Bristol’s 10-year average at 620,200 sq ft in 2022, with vacancy rates accordingly decreasing to 3.9% by the end of the year. Take-up for industrial space was at 2,379,999 sq ft in 2022, above the city’s 5-year average, and record demands were seen for e-commerce companies, logistics, and last-mile deliveries (Bristol Employment Land Review, June 2023, EVVEE02).

A range of employment forecasts have been produced for Bristol City Council, suggesting that the number of jobs in the Bristol economy will grow by between 31,000 to 53,000 between 2023-43. Between 6,100 to 16,000 of these will require the provision of new, additional office and industrial/warehouse space, with at least some of the remainder likely to be employed in what might be considered employment space in strict planning use terms.

In addition, it is anticipated that due to building obsolescence there is likely to be an element of replacement demand prevalent over the new plan period which will add to the city’s need to provide workspace.

It is clear that there is both good demand currently and likely to exist in the future for office and industrial space in Bristol. However, there is an apparent imbalance of supply to meet this.

*Constrained supply*

Market evidence suggests that existing supply is insufficient to meet demand for office and industrial/distribution space in Bristol – there is currently approximately one years’ worth of annual take-up available. Leading up to 2016, most areas of Bristol experienced decreases in office, industrial, and mixed-use class B space although there are several pipeline office sites and new office buildings under construction, and industrial units delivered at Whitchurch Enterprise Park, Broomhill Rd and Avonmouth that could help relieve pressure in the short term (Figure 2).

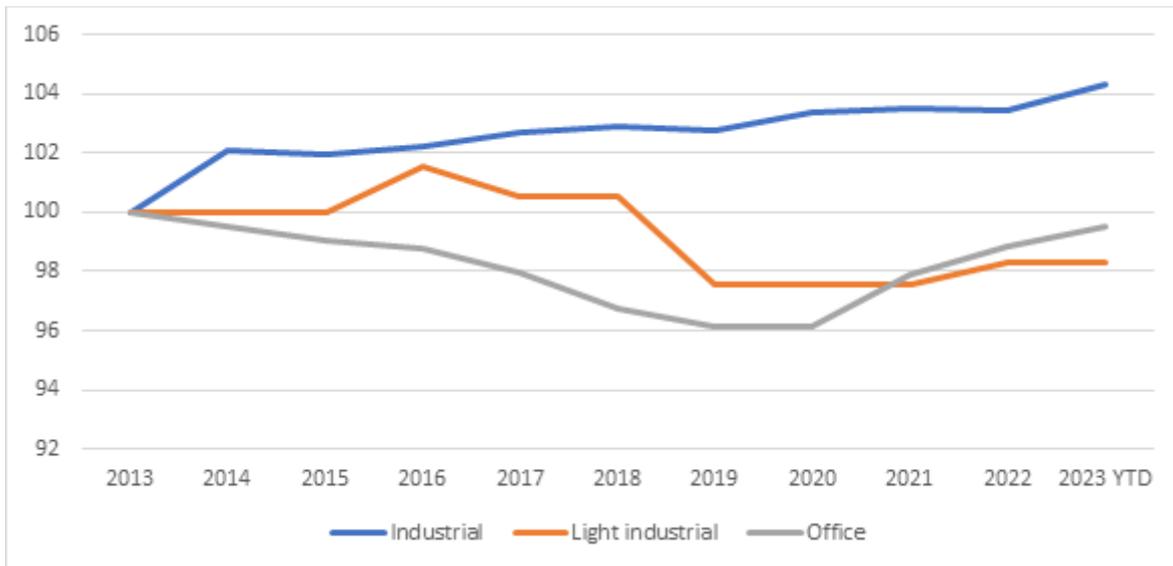


Figure 2: Total quantum of floorspace by type (Index 2013=100), Bristol (CoStar, 2023)

There is also an undersupply of flexible office space in Bristol compared to both Birmingham and Manchester, which JLL reports has dissuaded some businesses from locating in Bristol (Bristol Employment Land Review, June 2023, EVVE02).

All industrial units are fully let, leading to many occupiers having stayed because they need to, with their space no longer fit for purpose and/or hindering growth (Bristol Employment Land Review, June 2023, EVVE02).

Floorspace requirements arising from economic growth forecasts have been compared with the most recent planning pipeline available (Bristol Business Development Survey, 2022) for the delivery of office and industrial space. They suggest that after commitments are taken into account Bristol would face an outstanding requirement for up to 88,024 sq m of industrial/warehouse space and 74,466 sq m of office up to 2043 (Employment Land Topic Paper, November 2023, TPC003).

There are a number of pressures on supply in the industrial and office markets, such as:

Alternative uses through Permitted Development Rights and the introduction of the new E Use Class.

Limited commitment from developers and investors due to increases in build costs and interest rates, planning delays, with a focus on new build developments planned for the foreseeable future – likely to impact future supply of quality office stock

The Autumn 2022 mini-budget has affected investor confidence, hindering activity and causing investment transactions in 2022 to fall to just 42% of the 10-year average (Bristol Employment Land Review, June 2023, EVEE02).

### *Business engagement*

Business engagement through affordable workspace and similar regeneration discussions has highlighted the lack of supply of affordable workspace for Bristol's businesses. First-hand engagement with industrial businesses has confirmed this, with many industrial businesses in Frome Gateway and St Philips Marsh reporting difficulty finding acceptable alternative premises in the city, often having to stay in premises that are too small or subpar in quality.

Business reported that industrial uses are increasingly competing with new types of uses, such as breweries, creative workshops, events venues and R&D for industrial premises. Community and creative organisations reported difficulty finding spaces that were affordable and also flexible enough to accommodate their needs in non-industrial typologies.

## **Appendix 5 – Additional documents that can be added to the examination library**

The following documents referenced in the responses to the Inspectors' questions can be added to the examination library:

- [West of England Transport Model \(WERTM\) – Local Plan Modelling Outputs Report July 2024 \[supplied\] \[PQ14, PQ20\]](#)
- [Managing the development of houses in multiple occupation SPD \[PQ79, PQ82, PQ83\]](#)
- [Managing the development of houses in multiple occupation Supplementary Planning Document Reg. 13 Version \(August 2020\) - Evidence Paper \[PQ79\]](#)
- [Managing the development of houses in multiple occupation Draft Supplementary Planning Document Reg. 13 Version \(August 2020\) - Consultation Statement \[PQ79\]](#)
- [Managing the development of houses in multiple occupation Draft Supplementary Planning Document Reg. 13 Version \(August 2020\) - Summary of Reg. 13 Representations \[PQ79\]](#)
- [West of England extra care housing improvement project report \(August 2023\) \[PQ90\]](#)
- [Delivery of affordable build to rent homes in Bristol - Affordable housing practice note \[PQ92\]](#)
- [Avonmouth and Severnside Integrated Development, Infrastructure And Flood Risk Management Study February 2012 \[PQ99\]](#)
- [DM6: Public houses Practice Note \[PQ128\]](#)
- [City Centre Framework \(2021\) \[PQ140\]](#)
- [Space Standards Practice Note \[PQ150\]](#)
- [Planning Application Requirements Local List \[PQ157\]](#)