

Bristol Local Plan Main Modifications Consultation: Report of Representations (July 2026)

The consultation on the proposed Main Modifications to the Bristol Local Plan took place over a period of seven weeks, from 27th April to 12th June 2026. The consultation was published online on the Council's consultation hub, and respondents were invited to respond through the survey site, by email, or by post.

There were 196 respondents to the Main Modifications consultation, the list of which can be viewed in the '*Catalogue of Representations Received*'.

This report collates the responses by Chapter, Policy and Main Modification (MM) reference. It sets out the representations made in response to the proposed Main Modifications (summarised where necessary), alongside a brief response on behalf of the Council. This report also summarises the comments made to the Schedule of changes to the Policies Map and the additional Examination Notes which were published for viewing as part of this consultation and includes the Council responses to these.

Comments received which refer to the plan as a whole are not considered within the scope of the consultation as they do not relate to whether the Main Modifications as proposed make the plan sound and legally compliant. These comments have been set out in the Annex for completeness. Comments which are not related to the Main Modifications are not considered within the scope of the consultation. The Council has made reference to the number and content of these comments under the most relevant chapter subheadings, and they can be read in full in the '*Catalogue of Representations Received*'.

In cases where the Council has proposed that an amendment to a Main Modification may be necessary for reasons of soundness, this is set out for the Inspectors' consideration in **bold underlined text**, whilst the Main Modification as proposed in EXA064 is shown as underlined or ~~struckthrough~~.

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Schedule of main modifications (EXA064)

Chapter 1. A new local plan for Bristol

Introductory text

MM Ref	Respondent	Summary of representations	Council response
MM1.2	216 Home Builders Federation	Representor suggests an additional paragraph to MM1.2 to set out Council actions if monitoring identifies issues with the policies' operation.	Representations are noted; however, the comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification. In addition, the Council has already given notice to commence a new system local plan under the Town and Country Planning (Local Planning) (England) Regulations 2026 which will allow for reflection on adopted policy operation.

Chapter 3. Development strategy

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Policy DS1 - Policy DS14

MM Ref	Respondent	Summary of representations	Council response
MM3.2 MM3.4 MM3.7 MM3.19 MM3.21 MM3.25 MM3.27 MM3.28	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Objection to change of policy text from the “design of development will be expected to accord with” to “should have regard to”, as not clear from NPPF Sept 2023 what justified change, thereby lowering the level of influence of frameworks, delivery plans on design of development as in MM3.25 (Policy DS11) and MM3.27 (Policy DS12).	Modification made following the Inspector’s Action Note (IN7) to reflect the status of frameworks as non-statutory documents, particularly if they are out-of-date or do not exist. IN11 sets out modifications to DS11 and DS12 for development to be ‘in accordance with’ an approved masterplan, as it is envisaged a masterplan would form part of the planning application process and would be conditioned accordingly.
MM3.2 MM3.4 MM3.7 MM3.9 MM3.11 MM3.13 MM3.15 MM3.17 MM3.19 MM3.21 MM3.23 MM3.25 MM3.27 MM3.29 MM3.31	203 Bristol Civic Society	Suggested amendment to MMs referencing minimum densities in line with Policy UL2 to include the caveat “unless site constraints such as heritage indicate otherwise”.	Representation noted; however, appropriate densities will be considered in line with Policy CHE1 which sets out the approach to protecting heritage assets.

Policy DS1: Bristol City Centre

MM Ref	Respondent	Summary of representations	Council response
MM.3.2	175 The Windmill Hill and Malago Planning Group	Representation refers to MM3.2 with suggestions for greater design controls for development close to St Mary Redcliffe and other city centre landmarks to protect heritage and local/district centre identities.	Representation comments are noted; however, the suggested amendments to Policy DS1 are not considered to be within the scope of this consultation as they do not relate to the proposed modification.
	204 Victoria Park Action Group	Comments in support of MM3.2 and continued listing of Victoria Park as an important green space and a Historic Parks and Gardens. Suggested further amendments to MM proposed; to make area of St Mary Redcliffe clear and expand its setting, and to replace discretionary wording with stronger requirements.	Support noted. The policy text states development will provide a significantly improved setting for the Grade I listed St. Mary Redcliffe Church and the Grade II listed Thomas Chatterton's house and school. The modified additional text relating to Redcliffe Way has been added to DS1 in lieu of the development allocation BDA0802, which has been deleted. The policy is considered justified and effective as modified.
	148 Historic England	Comments in support of modifications to 'place principles'. Respondent concerned with lack of certainty around spatial distribution of plan's additional development, suggesting further clarification of the weight given to heritage assets in city centre. Respondent reiterates previous representations and Statement of Common Ground to suggest preparation of a tall building/height study to ensure coherency of cityscape, give conservation 'great	Support noted. As identified in IN11, the 'additional development' refers to the capacity identified by the Council at submission; EVEH01 identifies these sources at 6.1 of that document. The modified housing requirement incorporates capacity initially estimated to come forward beyond the plan period (due to delivery uncertainties). This shows that the majority of the additional capacity is located

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MM Ref	Respondent	Summary of representations	Council response
		weight', and to ensure tall buildings are excluded from heritage sensitive locations.	in the areas of growth and regeneration, and to a lesser extent, a small sites windfall allowance. Weight given to conservation of heritage assets in the city centre is clear under Policy CHE1 with Policy DS1 stating 'important' assets to be given 'great' weight, as agreed in SoCG. SoCG did not contain an agreement for BCC to publish tall building/height study as this is not required for the function of the policy or soundness of the plan.
	194 Crest Nicholson plc	Comments in support of MM3.2.	Support noted.
	202 University of Bristol	Comments in support of MM3.2.	Support noted.
MM3.3	202 University of Bristol	Comments in support of MM3.3, respondent suggests bringing an updated/new SPD forward within next 12 months as per Statement of Common Ground.	Representation noted; however, BCC agreed under SoCG that an updated/new version of the SPD would be beneficial, but due to timescales of the examination did not agree to a 12-month timeline.

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Policy DS1A: Bristol City Centre – Broadmead, Castle Park, the Old City

MM Ref	Respondent	Summary of representations	Council response
MM3.4	175 Windmill Hill and Malago Planning Group	Suggested that as Policy UL2 does not set out a maximum residential density, the local plan risks encouraging an over intensification of development in the Development Strategy policies which have been modified to include a specific approach to residential density.	The modification introduces a cross-reference to Policy UL2 for clarity. The comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.
	149 NHS Integrated Care Board (BNSSG)	Respondent considers that modifications across all DS areas fail to make explicit reference to healthcare infrastructure as proposed by representation submitted at Regulation 19. Respondent does not consider the modifications to be effective for the purposes of ensuring development adequately contributes to healthcare infrastructure, as it is unclear as to whether the NHS would qualify as a community use. It is unclear what and where DS1A will be implemented to meet infrastructure requirements, thereby making the proposed modifications unjustified and ineffective.	Representation noted; however, the text relating to the provision of ground floor space for community use is only subject to a modification in regard to the proportion sought. Contributions from new development to healthcare provision are addressed by Policy IDC1 (and the regeneration of the DS1A area will be subject to Policy IDC1).
	202 University of Bristol	Comments in support of modifications, with suggested further amendment to include 'where relevant' in reference to City Centre Development and Delivery Plan.	Representations are noted; however, the comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.

Policy DS2: Bristol Temple Quarter

MM Ref	Respondent	Summary of representations	Council response
MM3.7	148 Historic England	Comments in support of modifications referencing Bristol Temple Meads station.	Support noted.
	149 NHS Integrated Care Board (BNSSG)	Respondent considers that modifications across all DS areas fail to make explicit reference to healthcare infrastructure as proposed by representation submitted at Regulation 19. Notes that MM3.7 does not meaningfully reference health infrastructure but now sets out the quantum of housing expected. Respondent considers modifications to be unsound given that it is unclear how growth and infrastructure will align. Concern that changes in how masterplans or infrastructure delivery plans are referred to may impact the expectation on developers to provide proportionate healthcare infrastructure mitigation.	Representation noted; however, the Local Plan is intended to be read as a whole and is considered to accommodate the delivery of healthcare infrastructure. The provision of healthcare infrastructure would be sought under Policy IDC1, which sets out that contributions from new development to healthcare provision will be made, where appropriate, through CIL or S106. In addition, DS policies state a requirement for <i>'Infrastructure, services and community facilities required to support the new development'</i>. In line with examination document IN7, modifications have been made to clarify the role of non-statutory planning documents.
	202 University of Bristol	Comment in support of modification.	Support noted.
	219 Unite Group PLC	Comment in support of modification.	Support noted.

Policy DS3: St Philips Marsh

MM Ref	Respondent	Summary of representations	Council response
MM3.9	222 Railfuture Severnside	Comments in support of modifications. Respondent notes no reasoning included in EXA064 for deletion of requirement for new development to contribute to delivery of Temple Meads Station Eastern Access.	Support noted. The reasoning is included in the Schedule on page 16. The station entrance falls outside the DS3 area and has already been delivered.
MM3.9	204 Victoria Park Action Group	Representor suggests an amendment to a deletion in MM3.9, concerning Spark Evans Park.	Representations are noted; however, the comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.
	217 Smart Urban Living Bristol (one) Limited	Comments in support of modification	Support noted.
	219 Unite Group PLC	Comment in support of modification.	Support noted.
	175 Windmill Hill and Malago Planning Group	Suggested that as Policy UL2 does not set out a maximum residential density, the local plan risks encouraging an over intensification of development in the Development Strategy policies which have been modified to include a specific approach to residential density.	The modification introduces a cross-reference to Policy UL2 for clarity. The comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.
	203 Bristol Civic Society	Respondent refers to MM3.9 with suggested further amendments to include creation of a destination park to serve other parts of central and inner Bristol, with further new open spaces and active recreation, and introduction of a new standard of open space.	Representations are noted; however, the comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.

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MM3.9	155 Hatton Garden Properties Limited c/o Pearl & Coutts (part of the Structadene Group)	Comments in support of modifications which provides greater clarity on scale and nature of development expected in St Philip's Marsh and introduction of quantified development expectations, particularly the inclusion of 'at least 7000' new homes, and 'have regard to' for masterplans and frameworks. Concern that the policy framework for the north-western part of St Philip's Marsh is too restrictive. Respondent suggests an amendment to include residential and PBSA as appropriate forms of development.	Support noted. The policy approach is sufficiently flexible as MM 3.9 clarifies that residential and other uses may be suitable in the sub-area provided they are in accordance with the relevant policies in the local plan and the employment-led vision for the area. Therefore, the suggested amendment to Policy DS3 is not considered necessary to make the policy sound or legally compliant.
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Policy DS4: Western Harbour

MM Ref	Respondent	Summary of representations	Council response
MM3.11	175 Windmill Hill and Malago Planning Group	Suggested that as Policy UL2 does not set out a maximum residential density, the local plan risks encouraging an over intensification of development in the Development Strategy policies which have been modified to include a specific approach to residential density.	The modification introduces a cross-reference to Policy UL2 for clarity. The comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.
	148 Historic England	Comments in support of modification to reference Brunel's Swing Bridge and greater emphasis on responding to area's heritage assets.	Support noted.
	218 Natural England	Comments made in support of modification MM3.11 and affirms support to work with BCC on drafting a future mitigation strategy as included in MM3.11.	Support noted.

Policy DS5: Frome Gateway

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MM Ref	Respondent	Summary of representations	Council response
MM3.13	175 Windmill Hill and Malago Planning Group	Suggested that as Policy UL2 does not set out a maximum residential density, the Local Plan risks encouraging an over intensification of development in the Development Strategy policies which have been modified to include a specific approach to residential density.	The modification introduces a cross-reference to Policy UL2 for clarity. The comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.
	195 Old Market Community Association	Respondent refers to MM3.13 with suggested amendment to move reference to Old Market Neighbourhood Plan from explanatory text to within the policy text.	The representation does not relate to the approach set out in the MMs. The suggested amendment to Policy DS5 is not considered necessary to address matters of soundness or legal compliance. Neighbourhood Development Plans attain the same legal status as a local plan (and other documents that form part of the statutory development plan) once it has been approved at a referendum. Therefore, there is no need to include a reference to adopted NDP policies in the Policy Text throughout the Local Plan. The Local Plan sets out this relationship clearly at MM1.1 in the Schedule of Main Modifications (EXA064).
	202 University of Bristol	Comment in support of modification.	Support noted.
	203 Bristol Civic Society	Respondent objects to MM3.13 which sets a minimum density for the area as being inconsistent with table in Policy UL2.	The approach to density is reflective of policies UL1 and UL2, the character of each area, and the regeneration area's aspirations. Please refer to policy text for UL2: 'in areas of growth and regeneration set out in the Development Strategy the density sought will

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			reflect the amount of development proposed by those policies and any specific policy approaches in those areas. Therefore, no modification is necessary for DS5.
	211 Fusion Group	Comments in support of modification	Support noted.

Policy DS6: Lawrence Hill

MM Ref	Respondent	Summary of representations	Council response
MM3.15	175 Windmill Hill and Malago Planning Group	Suggested that as Policy UL2 does not set out a maximum residential density, the local plan risks encouraging an over intensification of development in the Development Strategy policies which have been modified to include a specific approach to residential density.	The modification introduces a cross-reference to Policy UL2 for clarity. The comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.
	203 Bristol Civic Society	Respondent objects to MM3.13 which sets a minimum density for the area as being inconsistent with table in Policy UL2.	The approach to density is reflective of policies UL1 and UL2, the character of each area, and the regeneration area's aspirations. Please refer to policy text for UL2: 'in areas of growth and regeneration set out in the Development Strategy the density sought will reflect the amount of development proposed by those policies and any specific policy approaches in those areas.' Therefore, no modification is necessary for DS5.
	193 Frank Bruce and Company Limited	Objects to the addition of 40,000 sqm of industry and distribution development, which has been introduced without justification or supporting evidence. The requirement for such a large quantum of low job density employment uses will	The reference to the provision of around 40,000m ² of industry and distribution premises as part of mixed-use development was included to set out the intention for the scale of development expected and to make

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		significantly impact the ability of the policy to deliver its objectives. The late inclusion of this requirement does not allow adequate consideration of the viability and deliverability of the policy. Suggests that the reference to a specific quantum should be removed and replaced with a requirement for higher quality employment space as part of any planning application or development framework.	the policy sound. It makes the policy clearer and therefore, more effective by providing an indication of the amount of industry and distribution floorspace expected. The figure was informed by analysis of the development potential for new employment floorspace and by issues including existing employment land provision and the Urban Potential Study. As stated in the policy wording, development in the Lawrence Hill area will be expected to make efficient use of land. The policy enables a flexible approach to delivery in the regeneration area and will operate alongside a regeneration framework which will provide further guidance to support delivery. The suggested amendment to Policy DS6 is not considered necessary to address matters of soundness or legal compliance and does not alter the conclusion that Policy DS6: Lawrence Hill as modified is sound.
	193 Frank Bruce and Company Limited	Supports the definition of the quantum of housing and the minimum housing density; changes to the reference to development frameworks; wording allowing sites to be consented where they don't prejudice the overall policy aim; the linkage to the policy map.	Support noted.
MM3.16	193 Frank Bruce and Company Limited	Supports the explanatory text amendments.	Support noted.

Policy DS7: Central Fishponds

MM Ref	Respondent	Summary of representations	Council response
MM3.17	175 Windmill Hill and Malago Planning Group	Suggested that as Policy UL2 does not set out a maximum residential density, the local plan risks encouraging an over intensification of development in the Development Strategy policies which have been modified to include a specific approach to residential density.	The modification introduces a cross-reference to Policy UL2 for clarity. The comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.
	203 Bristol Civic Society	Respondent objects to MM3.13 which sets a minimum density for the area as being inconsistent with table in Policy UL2.	The approach to density is reflective of policies UL1 and UL2, the character of each area, and the regeneration area's aspirations. Please refer to policy text for UL2: 'in areas of growth and regeneration set out in the Development Strategy the density sought will reflect the amount of development proposed by those policies and any specific policy approaches in those areas'. Therefore, no modification is necessary for DS5.
	149 NHS Integrated Care Board (BNSSG)	Respondent considers that modifications across all DS areas fail to make explicit reference to healthcare infrastructure as proposed by representation submitted at Regulation 19. Notes that MM3.17 does not meaningfully reference health infrastructure but now sets out the quantum of housing expected. Respondent considers modifications to be unsound given that it is unclear how growth and infrastructure will align.	Representation noted; however, the Local Plan is intended to be read as a whole and is considered to accommodate the delivery of healthcare infrastructure. The provision of healthcare infrastructure would be sought under Policy IDC1, which sets out that contributions from new development to healthcare provision will be made, where appropriate, through CIL or S106. In addition, DS policies state a requirement for

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MM Ref	Respondent	Summary of representations	Council response
		Concern that changes in how masterplans or infrastructure delivery plans are referred to may impact the expectation on developers to provide proportionate healthcare infrastructure mitigation.	<i>'Infrastructure, services and community facilities required to support the new development'.</i> In line with examination document IN7, modifications have been made to clarify the role of non-statutory planning documents.

Policy DS8: Central Bedminster

MM Ref	Respondent	Summary of representations	Council response
MM3.19	52 David Campell	Objection to removal of 'inclusive' community wording, removal of maximum number of student bedspaces, and modified wording around weighting given to regeneration frameworks.	Representation noted; however, suggested amendments are not considered necessary for reasons of soundness/legal compliance. The approach to the removal of student bedspace caps is addressed fully in the Council's response to representations on Policy H7. Further modifications are not considered necessary for soundness. In line with examination document IN7, modifications have been made to clarify the role of non-statutory planning documents.

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MM Ref	Respondent	Summary of representations	Council response
	175 Windmill Hill and Malago Planning Group	Suggested that as Policy UL2 does not set out a maximum residential density, the local plan risks encouraging an over intensification of development in the Development Strategy policies which have been modified to include a specific approach to residential density.	The modification introduces a cross-reference to Policy UL2 for clarity. The comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.
	210 Stephen Wickham	Objection to modification of alignment between development proposal and regeneration frameworks.	In line with examination document IN7, modifications have been made to clarify the role of non-statutory planning documents.
MM3.19	202 University of Bristol 211 Fusion Group	Comment in support of modification removing the student bedspace cap.	Support noted.
MM3.19	204 Victoria Park Action Group	Objection to removal of student bedspace cap and modification in how the policy refers to regeneration frameworks.	Objections noted; however, the student bedspace caps were removed for reasons of soundness. In line with examination document IN7, modifications have been made to clarify the role of non-statutory planning documents. Further modifications are not considered necessary for soundness/legal compliance reasons. Representation in relation to concerns around services and facilities are noted; however, the comments are not considered to be within the
MM3.20		Respondent raises concerns around services and facilities (GPs and schools) to serve proposed new housing growth for the area, queries the provision and location of industry and distribution premises, and references support for light industrial use of Whitehouse Street regeneration.	

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MM Ref	Respondent	Summary of representations	Council response
			scope of this consultation as they do not relate to the proposed modification. Moreover, the Council considers that policy IDC1 adequately addresses this point.

Policy DS9: Brislington

MM Ref	Respondent	Summary of representations	Council response
MM.3.21	148 Historic England	Comments in support of modifications. Suggestion to evidence how the significance of affected heritage assets has informed the principle, quantum and form of development.	Support noted. Representations are noted; however, the comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification. For clarity, policy DS9 sets out only the expected capacity, and not the form that this development will take. Proposals that establish the specific form of development will be assessed according to their impact on the significance of heritage assets in line with policy CHE1.

Policy DS10: The Green Belt

MM Ref	Respondent	Summary of representations	Council response
MM3.23	116 Luke Goaman-Dodson	Objection to removal of policy text on 'inappropriate development' as this weakens protection of Green Belt land.	Modification was made in response to IN7 to ensure the policy refers more broadly to proposals in the Green Belt being assessed against the requirements of national policy, rather than focussing only on protection from inappropriate development. The paragraph references national policy, with the NPPF setting out that development in the Green Belt is inappropriate unless one of a number of exceptions applies. The protection of Green Belt remains the same and will be dictated by national policy.
	194 Crest Nicholson plc	Comments in support of modification.	Support noted.
MM3.24	116 Luke Goaman-Dodson	Objection to vagueness of 'exceptions' for development in Greenbelt.	The exceptions referenced within paragraph 3.3.27 are listed in Paragraph 154 the National Planning Policy Framework 2024.

Policy DS11: Development allocations – south west Bristol

MM Ref	Respondent	Summary of representations	Council response
MM3.25	148 Historic England	Comments in support of the modification to reference the setting of heritage assets. Concern that there is no evidence of how significance of affected assets have been considered and the development's relative impact. Respondent refers to guidance produced for local authorities.	Representation noted; however, no further modifications are considered necessary for reasons of soundness/legal compliance. The policy as modified is considered to address the heritage concerns in relation to

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MM Ref	Respondent	Summary of representations	Council response
			Ashton Court by ensuring that the asset's setting is specifically considered through the design process. The impact of the proposal on the significance of the asset will be determined through the decision-making process and assessed in accordance with policy CHE1.
MM3.25	128 Barratt Homes (Bristol)	Concerns were raised regarding the relationship between the BLP Policy DS11 'Elsbert Drive' site allocation and adjacent land within North Somerset. The representation argued that the Main Modifications to Policy DS11 were ineffective and therefore unsound, as the policy would not deliver an appropriate cross-boundary development framework for the wider area. Suggested wording amendments were also provided.	Policy DS11 refers to the preparation of a detailed cross-boundary framework or masterplan. However, delivery of the site is not contingent on the adjacent land within North Somerset coming forward. The proposed modifications reflect the Council's position that development of the 'Elsbert Drive' allocation can proceed independently, should the sites within North Somerset not be brought forward.
MM3.26			

Policy DS12: New neighbourhood – Bath Road, Brislington

MM Ref	Respondent	Summary of representations	Council response
MM3.27	213 Toby Leung	Objection to proposed allocation of homes in policy (500-700 homes) when considering wider growth (endorsed Hicks Gate masterplan) as lack of published transport assessment to assess cumulative impact of DS12 considering BANES' proposals (Land North of A4 and Barwood Land).	AtkinsRéalis completed local plan modelling work using the West of England Transport Model (WERTM). This includes the West of England Combined Authority (WECA) development targets identified in the emerging local plans and therefore considers the cumulative effects on the transport network.

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		Respondent further objects to removal of Green Belt in creation of Policy DS12.	Comments relating to the release of land within the Green Belt are noted; however, the comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.
MM3.27	194 Crest Nicholson plc	Comments in support of MM3.27.	Support noted.
MM3.28		Comments in support of MM 3.28. Respondent suggests further amendments to explanatory text to reflect wider strategic growth across Bristol and BANES (example of bordering allocation at Hicks Gate).	Support noted. The existing wording in the explanatory text includes reference to a masterplan. It is acknowledged that the West of England Mayoral Combined Authority has recently endorsed the joint Masterplan for Hicks Gate as a non-statutory planning framework to inform emerging planning policy. However, the inclusion of explicit reference to the West of England master planning in the suggested amendment to MM3.28 is not considered necessary for soundness/legal compliance.

Policy DS13: Lockleaze

No representations received regarding Main Modifications to Policy DS13: Lockleaze.

Policy DS14: Central Southmead

MM Ref	Respondent	Summary of representations	Council response
MM3.31	175 Windmill Hill and Malago Planning Group	Suggested that as Policy UL2 does not set out a maximum residential density, the local plan risks encouraging an over intensification of development in the Development Strategy policies which have been modified to include a specific approach to residential density.	The modification introduces a cross-reference to Policy UL2 for clarity. The comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.

Chapter 4. Infrastructure, developer contributions and social value

Policy IDC1: Development contributions and CIL

MM Ref	Respondent	Summary of representations	Council response
MM4.1	149 NHS Integrated Care Board (BNSSG)	Supports modification clarifying when planning obligations can be sought. Considers modifications to the policy to be unsound on the basis that the obligations mechanisms referred to (CIL and S106) are not functioning effectively, therefore raising concerns about the application of the policy. Respondent highlights representations made at Reg.19, proposing modifications to policies DS1-DS14 that would indicate the necessary healthcare infrastructure requirements. Respondent references previous attempts at securing S106 agreement for development to provide healthcare infrastructure.	Support noted. Representation noted; however, the policy as modified, alongside the references to the infrastructure required to support new development in the DS policy texts, is considered to be sufficient to support the effective application of the policy.
	216 Home Builders Federation	Comments in support of modification.	Support noted.

Policy SV1: Social value and inclusion

MM Ref	Respondent	Summary of representations	Council response
MM4.3	143 Alan Gallagher	Representation refers to the Main Modifications which reflect the deletion of Policy SV1. Concerns were raised that the deletion of Policy SV1 would	Representation provided does not alter the conclusion that, due to the identified soundness issues set out in IN11, Policy SV1 should be deleted.

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MM Ref	Respondent	Summary of representations	Council response
		reduce the local plan's visible role in promoting inclusive social value.	The deletion of the policy does not alter the Local Plan's aim as a whole of promoting social value through its focus on inclusive economic growth and wellbeing.
MM4.4		Highlighted the importance of monitoring and reviewing policies to ensure social value is achieved.	General monitoring comments noted.
MM4.5			

Chapter 5. Urban living: Making the best use of the city's land

Policy UL1: Effective and efficient use of land

MM Ref	Respondent	Summary of representations	Council response
MM5.2	184 Sovereign Network Group	Suggested additional amendments to support the more efficient use of more areas of land. E.g., where car parks and upper floors are occupied/in use but have the potential to be used more effectively to make efficient use of land and to optimise housing delivery.	Representation noted; however, further amendments are not considered necessary for reasons of soundness/legal compliance. The modified text is considered to accurately reflect the sites the policy is intended to apply to.
MM5.2	203 Bristol Civic Society	Suggested amendment to Diagram 5.1 to present Policy DS4 ('Western Harbour') as 'Inner Urban (more intensive)' to show consistency with Policy UL2.	Representation noted. However, the policy text as modified sets out that 'in areas of growth and regeneration, development should reflect any minimum density outlined in the relevant development strategy policy'. The densities set out in the DS area policy texts provide a clearer indication of the Local Plan's intentions for the areas. As the diagram is presented as an indicative reflection of the distribution of densities across the city, a modification to the diagram is not considered necessary for reasons of soundness/legal compliance.

Policy UL2: Residential densities

MM Ref	Respondent	Summary of representations	Council response
MM5.3	175 Windmill Hill and Malago Planning Group	Suggested that consideration for the appropriate density of development should also consider landscape features, as well as the provision of healthcare facilities and schools.	Representation noted; however, the suggested amendments to the policy are not considered necessary for soundness/legal compliance.

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MM Ref	Respondent	Summary of representations	Council response
		Further suggestion to make specific reference to the local list of heritage assets.	The policy text sets out that the suitability of sites for higher density will be considered in terms of the site and its context, which includes the landscape concerns highlighted. Policy IDC1 sets out that development will be supported by the provision of infrastructure, services and facilities required to make the development acceptable. The approach to locally important heritage assets is set out in policy CHE1.
MM5.3	194 Crest Nicholson plc	General support for the modified policy, including reference to factors which could lead to a lower minimum density. Respondent suggests that the text should be modified further to broaden the cases in which more intensive development may not be appropriate.	Partial support for the principle of acceptable lower densities noted. Representation noted; however, further amendments are not considered necessary for reasons of soundness/legal compliance. The policy text sets out that the suitability of sites for higher density will be considered in terms of the site and its context, which includes the site-specific and landscape concerns highlighted by the respondent. The policy text already references the need to have regard to the character and design of the existing area when considering appropriate densities.

Chapter 6. Housing

Chapter introductory section

MM Ref	Respondent	Summary of representations	Council response
MM6.1	194 Crest Nicholson plc	The modified housing requirement and identification of the level of unmet need is strongly supported. The modification setting out the need for an immediate review of the Local Plan is unsound given that it would be unlikely to identify additional land but could provide neighbouring authorities with a reason to justify not accommodating unmet needs in their Local Plans. Suggest that the text is modified to clarify that Bristol's unmet need will be considered through the ongoing Local Plan processes of its neighbouring authorities.	Support for the modified housing requirement and unmet need is noted. The immediate review of the Local Plan under the new planning system is a requirement of the transitional arrangements as prescribed in government policy.
MM6.1	214 Catesby Estate	The approach to the calculation of unmet need remains fully in conflict with the Planning Inspectorate's interpretation provided to Councils at the Greater Nottingham Strategic Plan Examination. Applying the correct 2023-based standard method, in place at the time the Plan was submitted for examination, results in a figure of 3,380 homes per annum. Applying the 2023-based standard method would closely align with the amount of homes needed to address Bristol's affordable housing needs and ensure the requirements of Policy AH1 are deliverable.	Reform to the standard method was introduced by the government in December 2024 (prior to the commencement of the hearing sessions) on the basis that the previous method was not fit for purpose. The change to the Government's standard method was addressed in the BCC response to Q2.1 and presented at examination. The standard method housing need is a live figure that changes every year. To identify an unmet need figure within the plan in line with a figure that would be substantially out of date upon

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MM Ref	Respondent	Summary of representations	Council response
		Catesby Estates' position is that the Plan remains 'adoptable' and that MM6.1 can be updated. The following wording has been suggested to amend MM6.1 for soundness: 'Based on the standard method when the Bristol Local Plan was submitted (April 2024) the level of unmet need equates to 1,163 homes per year or 20,925 over the local plan period... A minimum 9,304 homes contributing towards Bristol's unmet housing need, equivalent to the 8-year shortfall not covered by the SDS (2022-2030), will need to be accounted for within local plans for neighbouring areas...' <i>Please see Catalogue of Representations for full suggested wording.</i>	adoption is considered likely to cause confusion. With reference to IN11, the modification intends to clarify the unmet figure at the point of adoption. The comments refer to Inspectors' questions posed in the Greater Nottingham Strategic Plan (GNSP). The Council notes that the GNSP examination hearing sessions have not yet commenced therefore sets an interpretation to be tested and clarity from the Inspectorate is expected. The policy wording at 6.9 which refers to the role of neighbouring Local Plans is not subject to a proposed main modification. The wording is considered to be in line with the policies in the NPPF on maintaining effective co-operation.
MM6.1	215 Bristol Grammar School	To accommodate the proposed higher housing requirement, and to provide the necessary flexibility and have a positively prepared plan, it seems logical to look for additional sites to allocate. Comments made in reference to land at Golden Hill which has previously been promoted at each stage of the plan making process	Representation noted; however, as set out in IN11, there has been no need to identify additional allocations at this time. The promoted site is identified in the Local Plan as Reserved Open Space under Policy GI2 and has already been considered for its potential to contribute to the housing supply through the SHLAA and found to be unsuitable.

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MM Ref	Respondent	Summary of representations	Council response
	216 Home Builders Federation	Supports the proposed higher housing requirement but remains concerned that the Plan is not sufficiently clear as to how this will be delivered.	Support for the higher housing requirement noted.

Policy H1: Delivery of new homes – Bristol's housing requirement

MM Ref	Respondent	Summary of representations	Council response
MM6.2	143 Alan Gallagher	The increased emphasis on housing delivery is supported.	Support noted.
	194 Crest Nicholson	The modified housing requirement is strongly supported.	Support noted.
	211 Fusion Group	The proposed higher housing requirement is supported, but it is unclear how this is to be achieved without additional allocations. Understands that the Council intends to make up the shortfall by increasing densities on existing allocations and regeneration areas, but are concerned that this approach will not deliver the required housing numbers. This is because this is based on increasing the density at existing allocations and regeneration areas, and not aware of any additional studies of these sites to understand if it is possible to push densities further; this may recreate unacceptable proposals at planning stage; and buildings over 18m carry additional costs.	Support for higher housing requirement noted. The modified requirement represents the capacity of the sites that the Council has identified, with that increase against the submission figure largely expected to be delivered toward the end of the plan period. The densities sought can therefore be considered to be developable in line with the definition in Annex 2 of the NPPF. In light of the immediate review of the Local Plan, the allocation of additional sites will be revisited in this context and is not considered necessary for reasons of soundness/legal compliance at this stage.

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MM Ref	Respondent	Summary of representations	Council response
		New allocations are essential to provide flexibility in the face of viability issues or delays, and to make the policy sound. Suggests that a table within Policy H1 summarising housing targets across regenerations areas should be included.	
MM6.2	216 Home Builders Federation	Supports the proposed higher housing requirement but remain concerned that the Plan is not sufficiently clear as to how this will be delivered.	Support noted. The modified requirement represents the capacity of the sites that the Council has identified, with that increase against the submission figure largely expected to be delivered toward the end of the plan period. The densities sought can therefore be considered to be developable in line with the definition in Annex 2 of the NPPF.
MM6.3		Supports the inclusion of trajectory diagrams. Suggests that the wording of proposed para. 6.13a could be misinterpreted. It should be clearly set out that efforts to address any under-delivery of housing should be begun as soon as any under-delivery is identified, rather than until the end of the plan period. Suggests further explanation of the Liverpool method to differentiate methodology and calculations from the need for immediate action.	Support noted. Suggested amendment to MM6.3 is not considered necessary for soundness or compliance reasons. The Council believes the Liverpool method to be a sufficiently well-established way of addressing under-delivery during the plan period. The Local Plan itself is not considered a suitable location to explain the Liverpool methodology and alternatives in detail.

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Policy AH1: Affordable housing provision

MM Ref	Respondent	Summary of representations	Council response
MM6.4	143 Alan Gallagher	The approach towards affordable housing delivery is supported.	Support noted. Monitoring comments are addressed against MMD.1
MM6.5			
MM6.4	192 Hammerson, Harringay, Melburg & Olympian Homes	Supports the modifications, though it is unclear whether co-living is subject to the policy, given that there is no policy governing affordable housing for co-living like there is for built-to-rent.	Comments noted. The explanation to Policy BTR1 sets out that 'Co-living or shared living developments that meet this definition will be considered as build to rent housing.'
MM6.5			
MM6.6			
MM6.4	216 Home Builders Federation	Supports the proposed changes to affordable housing targets.	Support noted.
		Suggests reordering proposed para. 6.17 and 6.18 and reviewing the additional wording about private sector land for clarity.	
MM6.5	87 Taylor Wimpey	MM6.5 and MM6.6 taken together creates a confusion regarding the affordable housing contribution expected for sites released from the Green Belt, such as DS11. It is unclear whether the requirement is the 30% set out for 'Other locations' or a potentially higher requirement in line with national policy. An affordable housing contribution above <u>evidenced viability</u> levels would make the modifications unsound.	Suggested amendment to MM 6.5 and 6.6 are not considered necessary for soundness/compliance reasons. The modification is intended to add the necessary clarity that Green Belt release sites (including DS11) must now be subject to the national policy requirements that the government has set out. The provisions of NPPF 2024 will apply and Para 157 is relevant
MM6.6			

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MM Ref	Respondent	Summary of representations	Council response
		Suggests modifications to either: i. Reinsert a target of 30% into DS11 (preferred) or ii. Amend AH1 to clarify that ‘other locations’ includes DS11 and delete reference to separate Green Belt affordable housing requirements.	(in line with Footnote 58), as explained in document IN11 point 20. The modifications proposed by the respondent are not considered to add clarity to the policy. The policy as proposed clearly references diagram 6.1 to define the applicable zones. The reference to national policy requirements is considered useful to signpost to applicants that the government has established new requirements, with a national impact.
MM6.5	149 NHS Integrated Care Board (BNSSG)	Concern that modification fails to clarify the resultant impact of a reduced level of affordable housing on other supporting infrastructure. Lack of clarity as to how Council determines acceptability of development with underlying viability issues, in the absence of a defined affordable housing requirement. Modification in relation to Council working with central government to improve scheme viability questions the deliverability and effectiveness of policy itself, making it unsound.	Modifications to MM6.5 are not considered necessary for soundness or compliance reasons. MM6.5 is considered to already appropriately address the comments raised by the respondent, as the affordable housing requirement remains defined, and the policy reflects the provisions of NPPF para. 58 (September 2023). This approach to viability is considered appropriate and with reference to IN11 the relevant text is moved to the policy text for clarity. Viability matters are to be considered in the context of the policy and Plan as whole Where a proposal identifies that the policy

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MM Ref	Respondent	Summary of representations	Council response
			compliant level of Affordable housing is not viable, the policy encourages, but cannot require, the applicant to seek central government funding to provide additionality.
MM6.5	177 Watkin Jones Group	Suggests the policy should make clear that late-stage review is not expected for PBSA and BTR, and that the affordable housing contributions for each are set out in BTR1 and H7 respectively.	As clarified in the explanation to AH1 (MM6.4) the Affordable housing policy for Build to Rent is specifically set out in Policy BTR1. Therefore, it is not considered necessary to add any further wording to address this point in policy AH1. Comments are responded to in more detail under the more relevant modifications at H7 and BTR1.
MM6.6			
MM6.5	184 Sovereign Network Group	The modifications to the explanatory text referencing working with RP partners to increase affordable housing delivery should be reflected in the policy text for clarity. It is suggested that the following additional text is added to the policy wording: <i>The Council encourages consideration of the following mechanisms (or as otherwise agreed with the Council) as routes which could increase affordable housing provision, where the minimum percentage cannot be viably met. Increasing market viability:...</i> <i>(add) The developer works with an RP partner to secure funding for additional affordable housing from Homes England.</i>	Suggested amendment to MM6.5 is not considered necessary for soundness or compliance reasons as the section of the policy is concerned with routes to increasing market viability to enable a greater proportion of AH to be secured unsubsidised (i.e. by S106). Any Homes England-funded affordable housing delivery (additionality) sits outside of the market viability calculation. The submitted version of the local plan set out an approach to require developers to increase AH delivery through use of public sector funding, which has subsequently required

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			modification as this was not found to be justified. The reference to working with RP partners in the explanatory text is appropriate in relation to the proposed element of MM6.5 which ‘encourages developers to improve any shortfall against the percentage requirement through use of public subsidy’. However, the Council notes that the suggested further modification has highlighted a point of clarity that is required to ensure the policy is interpreted as intended: The Viability Assessment subsection of the policy text requires a correction to the policy text to distinguish the routes to increase shortfalls against percentage requirements; by clearly separating the routes of increasing market viability, and encouraging use of public subsidy. The Council invite the Inspectors to consider a further modification for clarity (<u>bold underlined text</u> proposes the additional main modification wording):

			<u>Viability assessments</u> Where the developer considers that scheme viability may be affected by the percentage required, they will be expected to demonstrate whether particular circumstances justify the need for a viability assessment and provide full development appraisals to demonstrate an alternative amount of affordable housing provision. <u>Where viability evidence provided confirms that the required level is not viable, but the Council considers that the development is acceptable in other regards, then:</u> • <u>The Council will encourage developers to make use of mechanisms to increase market viability (identified below) to improve any shortfall against the percentage requirement</u> • <u>The Council will agree to secure the viable level identified;</u> • <u>Agreement to viability testing at a later stage should market conditions improve may be required through a planning obligation, and</u> • <u>The Council will encourage developers to improve any shortfall against the percentage requirement through use of</u>
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MM Ref	Respondent	Summary of representations	Council response
			public subsidy. ('mechanisms' identified below).
MM6.5	194 Crest Nicholson	Supports the modification with the proviso that the affordable housing requirement for land released from the Green Belt is set at 30%. The modification as currently proposed would set affordable housing requirements on land released from the Green Belt at 45% in the east of the city, when it has otherwise been reduced to 30% in other locations.	The modification is intended to add the necessary clarity that Green Belt release sites (including DS11) must now be subject to the national policy requirements that the government has set out as explained in document IN11 point 20. The provisions of NPPF 2024 will apply and Para 157 is relevant (in line with Footnote 58).
MM6.5	211 Fusion Group	Welcomes the change to an explicit 20% affordable housing requirement in Central Bristol. However, the policy as proposed does not address whether the 'fast track' route set out in the Council's 'Affordable Housing Practice Note', regarding schemes delivering at least 20% affordable housing in the Inner West and Inner East Zones, is to be maintained.	The modification to delete reference to the fast-track approach is considered to be clear, as explained in IN11. The Affordable Housing Practise Note will be refreshed to reflect the Local Plan upon adoption to provide relevant guidance.
MM6.5	212 Churchill Retirement Living and McCarthy & Stone	Specialist housing for older people has not been tested within the Viability Assessment, and so cannot be treated generically within affordable housing policy. A reduced affordable housing target is likely to be appropriate. The policy should also introduce an exemption from the review mechanism for smaller single phased developments.	The requested modification is not considered necessary for soundness/compliance reasons. As per PPG, Paragraph: 008 Reference ID: 10-008-20190509 Revision date: 09 05 2019, <i>It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Such circumstances could include, for</i>

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			<i>example... where particular types of development are proposed which may significantly vary from standard models of development for sale (for example build to rent or housing for older people). A reduced affordable housing target specifically is therefore not considered to be necessary.</i> Regarding the exemption to review mechanism: The policy is relevant to any schemes over 10 units. However, the modified policy is considered to be suitably flexible in application (“...<u>may</u> be required...”) and planning obligations are subject to the tests set out in the NPPF (2023 version, Para 58) that they must be fairly and reasonably related in scale and kind to the development.
MM6.5	215 Bristol Grammar School	Supports the policy, particularly where the promotion of community-led housing schemes on sites including Protected Open Space is retained.	Support noted.
MM6.5	216 Home Builders Federation	Suggests reordering the policy for clarity with targets presented first. The proposed wording regarding site-specific viability appraisals is confusing and suggests a two-stage process involving justifying the need for an appraisal then preparing one, which is inconsistent with national policy.	The re-ordering of the policy is not considered necessary for soundness or compliance reasons. The modified policy as proposed is considered sufficiently clear. The two-stage process referred to by the respondent is not recognised and the policy text is considered to reflect national policy and

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MM Ref	Respondent	Summary of representations	Council response
		Concerns about the cumulative impact of policy requirements and s106 on deliverability and viability have not been captured in the plan, and further flexibility is needed.	guidance in which the applicant must demonstrate the need for a viability assessment.

Policy H4: Housing type and mix

MM Ref	Respondent	Summary of representations	Council response
MM6.7	175 Windmill Hill and Malago Planning Group	A separate policy should exist to redress harmful imbalances in the housing mix, including a list of areas with harmful balances to inform decision-making.	Representation noted; however, suggested amendment to Policy H4 is not considered necessary for soundness/legal compliance and therefore is not within the scope of this consultation.
	194 Crest Nicholson	The modification requiring development to avoid the creation of a harmful imbalance is supported.	Support noted.
	143 Alan Gallagher	Policy as modified is supported insofar as attention is paid to the existing housing profile of an area, local housing evidence, and the avoidance of harmful housing imbalance.	Support noted.
MM6.8	194 Crest Nicholson	The additional text which makes it clear that the housing mix should be sensitive to the needs and character of the area is strongly supported.	Support noted.
	195 Old Market Community Association	Reference should be made to 'neighbourhood development plans' alongside references to masterplans and spatial frameworks.	The representation does not relate to the approach set out in the MMs. The suggested amendment to Policy H4 is not considered necessary to address matters of soundness or legal compliance. Neighbourhood Development Plans attain the same legal status as a local plan (and other documents that form part of the statutory development plan) once it has been approved at a referendum. Therefore, there is no need to repeat a reference to adopted NDP policies throughout the Local Plan. The Local Plan sets out this relationship clearly at MM1.1 in the Schedule of Main Modifications (EXA064).

Policy H5: Self-build and community-led housing

MM Ref	Respondent	Summary of representations	Council response
MM6.9	216 Home Builders Federation	Supports the clarification that unsold self-build plots can revert back to the developer if unsold after 12 months. Suggests a period of 6 months.	Support noted. Representation noted; however, suggested amendment to MM6.9 is not considered necessary for soundness or compliance reasons. 12 months is a commonly adopted policy found in Local Plans nationally, as it is considered a suitable amount of marketing time to provide opportunity to people who wish to build their own home to undertake a purchase, without unduly restricting the availability of the land for alternative market use in the medium term. 6 months is not considered an effective length of time for those that wish to build their own home to complete a plot purchase.
	215 Bristol Grammer School	Supports the modifications	Support noted

Policy H6: Houses in multiple occupation and other shared housing

MM Ref	Respondent	Summary of representations	Council response
MM6.11	177 Watkin Jones Group	The proposed modifications should clarify when the policy applies solely to HMOs rather than to other forms of shared housing such as purpose-built co-living. Modifications should make clear that the assessment of overconcentration applies to HMOs only.	The policy is considered to be clear, via the use of sub-headings, as to which parts of the policy are specific to HMOs only and which parts cover all forms of shared housing. Local imbalance in the housing mix has the potential to occur in relation to co-living schemes therefore the policy remains justified in its reference. The policy is clear on the assessment criteria that will apply to HMOs rather than co-living.
MM6.12			
MM6.11	192 Hammerson, Harringay, Melburg & Olympian Homes	Modifications should be amended/introduced to state that the policy does not apply to purpose built co-living schemes, as applying the 10% threshold would not meet tests of soundness.	The policy is considered to be clear, via the use of sub-headings as to which elements of policy apply only to HMOs.
MM6.12			
MM6.11	201 Laister Planning Ltd	The proposed modification fails the tests of soundness, with the level of control being unjustified and inconsistent with national planning policy. Specific concerns raised by the modifications are: Principle of the policy in its entirety (considers that the policy is too restrictive and controlling of the market. Also considers that the adopted SPD is suitable)	The principle of a HMO policy is considered to be justified to address local housing issues arising in the city. The modification does not propose to remove the policy in its entirety therefore the comments fall out of scope of the consultation. The modification to alter the word 'located' for 'sandwiched' is considered to add greater clarity to the policy and reduce the scope of

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		• Introduction of the term 'sandwiched' and the definition extending to up to 3 residential homes between HMO uses. • Introduction of the 100m radius. • The absolute requirement to comply with the 10% threshold. • Retention of the phrase 'will not be permitted' This could result in appropriate co-living developments being refused.	the broadness of interpretation that could arise from the word 'located' and refers to the existing adopted SPD for definitions. The reference to 100m has been moved from the submitted supporting text into the policy, in order to achieve an effective policy and to provide a clear interpretation of when local imbalance may occur. Retained phrases do not represent main modifications therefore are not considered to fall within the scope of the consultation.
MM6.12	16 Andrew Waller	The modified explanatory text in para. 6.63 introduces a caveat regarding the reduction of sandwiching effects due to intervening spaces or properties being detached. This sets up a conflict with the SPD on HMOs, which notes that sandwiching applies irrespective of limited breaks in building line. The modification is not positively prepared or justified.	The Council has reviewed the inconsistency between the explanatory text at 6.63 and the adopted HMO SPD Paragraph 4.1. The Council agreed that the proposed modification introduces confusion and that the effectiveness of Policy H6 would be improved by a modification The Council invite the Inspectors to consider a further modification for clarity (<u>bold underlined text</u> proposes the additional main modification wording). The Council considers that a local imbalance is likely to arise where:

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			up to three existing residential properties are sandwiched between two HMOs, <u>(or by other sandwiching variations as defined by the Council's 'Managing the development of houses in multiple occupation' SPD or successor document)</u> unless the effects are reduced by separation of properties due to intervening spaces <u>or properties being detached;</u>
	211 Fusion Group	The proposed modification which would make the policy applicable to co-living proposals is unduly onerous and would harm the prospects of many co-living schemes coming forward. The modification is not considered to be sound nor effective.	The policy is considered to be clear, via the use of sub-headings as to which elements of policy apply specifically to HMOs and which apply to other forms of shared housing including co-living schemes.

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

MM Ref	Respondent	Summary of representations	Council response
MM6.13	16 Andrew Waller	Modifications introduce two different definitions of larger scale PBSA development (100 and 250 bedspaces) which could cause confusion. Suggest a blanket 100-bedspace threshold which may help manage development more effectively in locations outside the city centre.	The definition of larger scale development varies between PBSA at existing University of Bristol residential sites and PBSA developed by accommodation providers. Representation noted; however, suggested amendment to MM6.13 is not considered necessary for soundness/legal compliance reasons.
MM6.13	149 NHS Integrated Care Board (BNSSG)	Modification introduces policy text that requiring PBSA proposals to be in accordance with the relevant DS policy, none of which make explicit	The representation to introduce a specific reference to new healthcare infrastructure does not relate to a proposed modification.

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MM Ref	Respondent	Summary of representations	Council response
		reference to the provision of additional healthcare infrastructure. This is therefore not considered an effective way of securing or delivering healthcare infrastructure to mitigate the demand generated through development.	The Local Plan is intended to be read as a whole and the following policies are considered to accommodate the delivery of healthcare infrastructure: The provision of healthcare infrastructure would be sought under Policy IDC1. In addition, DS policies state a requirement for ' <i>Infrastructure, services and community facilities required to support the new development</i> '.
MM6.14	16 Andrew Waller	Application of the 200m density threshold is not explained clearly within para. 6.87.	Representation noted; however, comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.
MM6.13 MM6.14	155 Hatton Garden Properties Limited c/o Pearl & Coutts (part of the Structadene Group)	The continued recognition of the importance of PBSA is supported. The policy as modified may restrict future delivery in highly sustainable locations and therefore a more flexible approach which would better support effective regeneration should be considered.	Support noted. The suggested modification to MM6.14 is not considered necessary for soundness or compliance reasons. The policy is considered to be flexible as it provides a framework for decision making for PBSA proposals across the city via the 'other locations' whilst balancing the housing needs for other groups of people.
MM6.13	175 Windmill Hill and Malago Planning Group	Student bedspace caps (especially in DS8) should not be removed through the main modifications so as not to overprovide a single type of accommodation, disproportionate to other uses, and without restrictions on changes of use to other forms of accommodation. The policy should be	Objections to the modifications to remove bedspace caps are noted. As explained in IN11, the caps were not found to be justified or positively prepared. However, the policy requires that other DS policy area objectives must not be inhibited by levels of PBSA, which

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MM Ref	Respondent	Summary of representations	Council response
		modified to require development to accord with existing frameworks.	will ensure that the balance of uses sought in the DS areas is achieved. The respondent requests that the policy is modified to require development to accord with existing frameworks. The approach in the modifications must have regard to specific area guidance. Frameworks are non-statutory documents and therefore seeking accordance is not considered to be justified.
MM6.13	175 Windmill Hill and Malago Planning Group	Student accommodation should be car-free, with exceptions for blue badge holders, and occupants deterred from parking elsewhere in the city, so as not to increase pressure on existing parking provision.	Suggested amendment considered to repeat the main modification already within the 'general provisions' section of the policy.
MM6.13	177 Watkin Jones Group 192 Hammerson, Harringay, Melburg & Olympian Homes 202 University of Bristol 211 Fusion Group	Multiple representations received regarding the soundness of a 35% affordable student housing requirement. The following concerns and suggestions were raised: No reason has been provided in EXA064 for the modification. A fixed requirement for 35% affordable student housing is not justified, effective, or consistent with national policy, and risks making housing delivery unviable.	For clarification, the 35% requirement was considered at examination as part of the existing explanatory text. This modification moves the figure from the explanatory section to the policy text for clarity. No further modifications were set out as necessary in the post-hearing actions. The Council's topic paper (TCP006) justifying the affordable student housing requirement due to ongoing affordability issues was considered at examination. The proportion sought reflects evidence collected on affordable student housing need in the city.

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MM Ref	Respondent	Summary of representations	Council response
	217 Smart Urban Living Bristol (One) Limited 219 Unite Group PLC	There is no definition of affordable student housing and no viability evidence for PBSA affordable housing has been submitted. Whether the policy is deliverable without a viability mechanism is questionable. Respondents suggested that text should be amended to reflect the ability for the proportion of affordable housing to be determined having regard to the viability of the development, or that the ability to challenge the requirement through viability assessments is acceptable in principle. Policy is inconsistent with the approach in AH1 which adopts a sliding scale for affordable provision based on location. Policy is inconsistent with the 2023 NPPF which exempts PBSA from an affordable housing requirement The viability scenarios used to justify the 35% affordable student housing requirement do not meet the respondents design expectation.	The Viability Assessment for the Local Plan (EVEV01) tested this proportion for PBSA, defining affordable student housing as rents set at 50% of the full maintenance Loan, and concluded that seeking a 35% proportion would be viable in most scenarios. It is not considered necessary to introduce viability mechanisms or different locational requirements given that the appraisal indicated viability in nearly all cases, excepting the highest benchmark land values. The NPPF exempts student housing from the 10% target for affordable home ownership only, given the tenancy model. Respondent's comment regarding the design of the viability scenarios were considered at examination. As no new evidence has been submitted by the respondent at this stage, no further modifications are considered necessary for soundness or compliance reasons.

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MM Ref	Respondent	Summary of representations	Council response
		The inconsistency between the levels of affordable housing required for PBSA, and those required for build-to-rent makes this policy unsound. Late-stage review of viability should not be expected for PBSA as this interferes with investor confidence	The Topic Paper sets out how affordable student housing functions differently to other housing products. It is therefore not considered necessary to bring the two affordable housing requirements into alignment.
MM6.13	177 Watkin Jones Group 192 Hammerson, Harringay, Melburg & Olympian Homes 202 University of Bristol 211 Fusion Group 217 Smart Urban Living Bristol (One) Limited 219 Unite Group PLC	Multiple representations received regarding nominations agreements. The following concerns and suggestions were raised: The requirement for all larger scale PBSA developments to have a nominations agreement is unsound. Requiring a nominations agreement to be provided as part of a planning application is not considered justified or effective, and should not be a determining factor for planning purposes unless presented as additional evidence of need. The policy as modified provides no means for unominated schemes to demonstrate that they meet an identified need. The modification could expressly state that where accommodation is not being provided for students	MM6.13 improves the clarity of the submitted policy by specifying the scale at which development should have the support of a relevant higher education provider. As set out in IN11, and BCC07 (Council's response, Q47) the modification requiring evidence of support is necessary to make the policy effective. MM6.13 includes reference to the use of a nomination agreement (previously within the explanatory text as shown at MM6.14). The intention is to provide an approach to ensuring this is suitably demonstrated. The Council upon considering the representations about accommodating alternative approaches to demonstrating

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MM Ref	Respondent	Summary of representations	Council response
		of a specific institution, applicants may instead demonstrate need and demand through robust evidence of accommodation needs. The proposed modification should be amended further to 'encourage' rather than require nominations agreements, and to set out alternative methods of showing support. Nominations agreements are commercial arrangements that cannot be meaningfully resolved at the planning application stage. A more appropriate approach would be to require applicants to demonstrate that the type, evidence, quantity and quality of the scheme align with evidenced student housing needs.	support for soundness purposes and invite the Inspectors to consider a further modification to the policy. The Council invite the Inspectors to consider a further modification for clarity (<u>bold underlined text</u> proposes the additional main modification wording): All proposals for purpose-built student accommodation will be expected to <u>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) should have the support of the relevant higher education provider where accommodation is being provided for students of that institution, such as in the form of a nomination agreement between the institution and the accommodation provider, or a letter of support from the higher education provider which sets out the proposal's role in meeting the institution's present and future accommodation needs in terms of the quantity, type, quality and location of the accommodation to be provided.</u>

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MM Ref	Respondent	Summary of representations	Council response
			demonstrably meet identified needs, to have the support of the relevant higher education provider when larger scale development is proposed and to be in accordance with the provisions set out below.² The suggested further modification that an application can <i>demonstrate need and demand through robust evidence accommodation needs</i> is not considered to be effective, as it is not clear what would constitute a robust assessment of accommodation needs outside of the local plan housing needs assessment evidence base.
MM6.13	192 Hammerson, Harringay, Melburg & Olympian Homes	Requiring PBSA in other locations to form part of mixed-use developments, and where they include self-contained accommodation to provide an affordable housing contribution in line with AH1 is considered unworkable and therefore unsound. Any compatible residential uses would be subject to separate viability clauses. No information has been provided to demonstrate policy viability. The relevant text should be deleted.	Representation noted; however, suggested amendments are not related to the main modification and are therefore not within the scope of this consultation. Neither the preference for mixed-use, nor the affordable housing requirement have been introduced as modifications, and no new evidence has been presented requiring the Council to amend their approach. For clarity, the Council's Hearing Statement (BCC07) set out that PBSA should form part of mixed-use developments only where feasible and appropriate, which is considered to allow

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			for suitable flexibility and for the justified application of affordable housing requirements in line with policy AH1.
MM6.13	202 University of Bristol	UoB generally supports the proposed Main Modifications. In particular, the following are welcomed: - The removal of bedspace caps in the Growth and Regeneration Areas (H7 & relevant “DS” policies); - The introduction of a clause allowing bedspace limits at UoB campuses to be exceeded (Policy H7); - The reintroduction of wording to protect the UoB Woodland Road campus (Policy DS1), and; - Inclusion of the UoB Woodland Road campus on the Policies Map;	Support noted.

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MM6.13	202 University of Bristol	The 500-bedspace cap at the Stoke Bishop campus is unsupported by robust or up-to-date evidence that justifies a fixed, quantitative limit at this location. As such, the main modifications have not addressed existing concerns. The local imbalance thresholds are not convincingly evidenced and justified and should be removed - the UoB is concerned that the threshold tests will restrict the supply of PBSA and therefore harmfully impact the UoB and its contribution to the city and wider region.	Response does not relate to the proposed main modification and is therefore not considered to be within the scope of the consultation. It is noted that the wording on the 500-bedspace cap was agreed on through SoCG (EXA055). Local imbalance elements of the policy are not subject to a main modification and are therefore considered outside of the scope of this consultation. As considered at examination (see Hearing Statement BCC07), the imbalance thresholds are not designed to restrict PBSA and are therefore set out in the explanatory text to allow for flexibility in application when balanced with the expectations of the wider community. Proposals with a mix of uses, which the policy encourages, are less likely to result in an imbalance, even when thresholds may be exceeded.
MM6.14	203 Bristol Civic Society	The reference to '8,800 additional bedspaces' required by 2040 should be removed or updated to reflect permissions for PBSA granted since.	Response does not relate to the proposed main modification and is therefore not considered to be within the scope of this consultation.
MM6.13	204 Victoria Park Action Group	The policy should revert to its original form with caps on student bedspaces and with evidence from the University of Bristol that the predicted demand is accurate and necessary.	Comments are noted, however the representation provided does not alter the conclusion that, due to identified soundness

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MM Ref	Respondent	Summary of representations	Council response
			issues with the submitted policies, the deleted bed-space caps should be reinstated.
MM6.13	210 Stephen Wickham	Objects to the proposed removal of student bedspace caps for PBSA directed into Bristol Temple Quarter (Policy DS2 and DS3) and Central Bedminster (Policy DS8). Concerns raised regarding the interaction between this and the removal of the need to 'accord with' the relevant DS8 development framework, leading to a potential PBSA and co-living overconcentration.	Comments are noted, however the representation provided does not alter the conclusion that, due to identified soundness issues with the submitted policies, the deleted bed-space caps should not be reinstated.
MM6.13	211 Fusion Group 217 Smart Urban Living Bristol (One) Limited 219 Unite Group PLC	Supports the removal of student bedspace caps in areas of growth and regeneration.	Support noted.
MM6.13	211 Fusion Group	Supports the modification encouraging affordable student housing to be allocated 'where feasible'.	Support noted.
MM6.13	217 Smart Urban Living Bristol (One) Limited	Supports the proposed modification to the relationship between PBSA development and any area-specific guidance. The continued direction of PBSA to specific areas risks reinstating an effective cap. Any area that is appropriate for housing should be capable of accommodating PBSA. The wording of the modification must be applied in a manner that preserves the ability for PBSA to	Support noted. The concerns raised that the policy directs PBSA to certain locations is not considered to be within the scope of this consultation as they do not relate to the proposed modification. The policy is considered sufficiently flexible via the 'other locations' policy which applies city wide, and justified in directing PBSA toward the most appropriate locations.

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MM Ref	Respondent	Summary of representations	Council response
		come forward across the wider St Philip's Marsh Area. Comments made in the context of the St Philip's Marsh masterplan, which directs PBSA solely to the north-west area.	With regard to Policy DS3, the Council maintains that the areas of growth and regeneration are justified in setting policy objectives that meet a range of city needs in a balanced way. It is noted that the St Philips Marsh masterplan (which would be a material consideration if approved by the Council rather than a statutory part of the development plan) is currently at draft stage.
MM6.13	217 Smart Urban Living Bristol (One) Limited	Objects to the continued inclusion of references to harm due to the over-concentration of PBSA. The inclusion of such language is inconsistent with the positive approach to housing delivery required and should be removed.	The objections to the policy are not considered to be within the scope of this consultation as they do not relate to the proposed modification contained in MM6.13. The phrase over-concentration is not used in the policy. The policy explanation which guides an understanding of local imbalances are not subject to a main modification therefore are outside of the scope of this consultation. As set out in TC006 the approach is consistent with policies in the NPPF (2023) that plans and decisions should be contributing to the delivery of a mix of uses and is justified.
MM6.14	219 Unite Group PLC	Objects to the principle reiterated within the MM that PBSA must be balanced against other types of housing so as not to result in harmful effects. This proposed modification seeks to prevent concentrations of PBSA whilst the policy as a whole	The modification to the explanatory text provides necessary clarification of how the first bullet of section 1 of the policy will be interpreted and assessed. It is therefore

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MM Ref	Respondent	Summary of representations	Council response
		seeks to direct PBSA to certain areas, which cannot be considered justified or effective. There is no tangible evidence to suggest that concentrations of managed PBSA buildings cause harm to the balance, function, diversity or character of an area. The entirety of the proposed modification to para. 6.73 and other references to the harms of over-concentration should be removed.	considered necessary to be retained for soundness and compliance reasons.

Policy H8: Older people's and other specialised needs housing

MM Ref	Respondent	Summary of representations	Council response
MM.6.15	212 Churchill Retirement Living and McCarthy & Stone	Supports the modifications which recognise viability and site considerations in relation to M4(3) requirements. The 50% target to be applied to extra care housing should be reduced in line with actual need and a proper consideration of viability, as set out in the respondent's previous hearing statements.	Support noted. The issue was addressed at examination (see BCC Hearing Statement on Matter 7). No new evidence has been submitted by the respondent that would suggest a further modification would be necessary for reasons of soundness/legal compliance.

Policy BTR1: Build to Rent housing

MM Ref	Respondent	Summary of representations	Council response
MM6.17	177 Watkin Jones Group	Policy should make clear that co-living is considered a form of BTR.	The explanation covers that where Co-living or shared living developments meet the NPPF definition they will be considered as build to rent housing.

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		Should further modify the policy that late-stage reviews will not be expected for this form of development as it interferes with investor confidence.	The objections to the policy are not considered to be within the scope of this consultation as they do not relate to the proposed modification, and the suggested modification is not considered necessary for soundness.
MM6.18	195 Old Market Community Association	Reference should be made to 'neighbourhood development plans' alongside references to masterplans and spatial frameworks.	The suggested amendment to Policy BTR1 is not considered necessary to address matters of soundness or legal compliance. Neighbourhood Development Plans attain the same legal status as a local plan (and other documents that form part of the statutory development plan) once it has been approved at a referendum. Therefore, there is no need to repeat a reference to adopted NDP policies throughout the Local Plan. The Local Plan sets out this relationship clearly at MM1.1 in the Schedule of Main Modifications (EXA064).

Policy H9: Accessible homes

MM Ref	Respondent	Summary of representations	Council response
MM6.19	216 Home Builders Federation	Supports the proposed modification which distinguishes between M4(3)(2)(a) and (b). Concerns remain about the cumulative impact of policy requirements and s106 on deliverability and viability.	Support noted. The concerns regarding the policy's cumulative impact on viability were considered during the examination and the representation does not present additional evidence which has not yet been considered

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			during Matter 7 Hearings with reference to the Local Plan Viability Evidence (EVE01).
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Policy H10: Planning for traveller sites

No representations received regarding the Main Modifications to Policy H10: Planning for Traveller Sites.

Policy H11: Houseboat dwellers

No representations received regarding the Main Modifications to Policy H11: Houseboat Dwellers.

Chapter 7. Economy and inclusive growth

Policy E1: Inclusive economic development

No representations received regarding the Main Modifications to Policy E1: Inclusive economic development.

Policy E2: Economic development land strategy

No representations received regarding the Main Modifications to Policy E2: Economic development land strategy.

Policy E4: Avonmouth Industrial Area and Bristol Port

No representations received regarding the Main Modifications to Policy E4: Avonmouth Industrial Area and Bristol Port.

Policy E5: Industry and Distribution Areas

MM Ref	Respondent	Summary of representations	Council response
MM7.8	195 Old Market Community Association	Previous suggestions have not been incorporated in Main Modifications. Reiterated the importance of referring to the Old Market Neighbourhood Development Plan in Policy E5 Policy Text.	Suggested amendments to MM7.8 are not considered necessary to make the Policy E5 sound or legally compliant. Neighbourhood Development Plans attain the same legal status as a local plan (and other documents that form part of the statutory development plan) once it has been approved at a referendum. Therefore, there is no need to repeat a reference to adopted NDP policies throughout the Local Plan. The Local Plan sets out this relationship clearly at MM1.1 in the Schedule of Main Modifications (EXA064).

Policy E6A: New workspace within mixed use development

MM Ref	Respondent	Summary of representations	Council response
MM7.10	143 Alan Gallagher	The representation seeks a modified approach to that set out in Policy E6A and requested that the plan should be monitored for whether local and affordable workspace, start-up space, social enterprise space and community-oriented employment opportunities are being delivered, especially in and around local and district centres.	Comments noted. These comments appear to partly relate to Policy E6: Affordable Workspace which has been deleted. The local plan's Economy chapter policies encourage a diverse range of scales and types of employment development across the city. MM1.2 sets out the proposed monitoring framework for the local plan policies. The suggested amendments are therefore not considered necessary to make the policy sound or legally compliant.
	175 Windmill Hill and Malago Planning Group	Suggested reinstating the minimum floorspace requirement for the provision of new workspace. Otherwise, the policy should include a definition for identifying a proportionate amount.	The explanatory text to Policy E6A (which was previously contained within paragraph 7.40) has been included in the policy wording to improve clarity regarding the provision of new workspace within mixed use development. The target of 10% of floorspace for new workspace has been removed from the policy wording as it was considered to be unclear as to how it was derived and what it related to. The suggested amendment to Policy E6A is not considered necessary to make the policy sound or legally compliant.
MM7.10	184 Sovereign Network Group	Suggested additional amendments to the MM wording, to ensure that the list of criteria for demonstrating where the provision of new	Comments are noted, however, the suggested amendment is contrary to the approach set out in the policy and is not considered

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MM Ref	Respondent	Summary of representations	Council response
		workspace is not required, clarifies that it is only one, or more, of the criteria which needs to be met.	necessary to make the policy sound or legally compliant.
	195 Old Market Community Association	Previous suggestions have not been incorporated in Main Modifications. Reiterated the importance of referring to the Old Market Neighbourhood Development Plan in Policy E6A Policy Text.	Suggested amendments to MM7.10 are not considered necessary to make Policy E6A sound or legally compliant. Neighbourhood Development Plans attain the same legal status as a local plan (and other documents that form part of the statutory development plan) once it has been approved at a referendum. Therefore, there is no need to repeat a reference to adopted NDP policies throughout the Local Plan. The Local Plan sets out this relationship clearly at MM1.1 in the Schedule of Main Modifications (EXA064).

Policy E6: Affordable workspace

MM Ref	Respondent	Summary of representations	Council response
MM7.12	143 Alan Gallagher	Concerns raised regarding the deletion of Policy E6 'Affordable Workspace'. Referred to the importance of monitoring to ensure a diverse range of workspace options are delivered, especially in local and district centres.	The local plan's Economy chapter policies encourage a diverse range of scales and types of employment development across the city. MM1.2 sets out the proposed monitoring framework for the local plan policies.
	211 Fusion Group	Expressed support for the deletion of Policy E6 ('Affordable Workspace').	Support noted.

Policy E8: Digital connectivity and inclusion

No representations received regarding the Main Modifications to Policy E8: Digital connectivity and inclusion.

Chapter 8. Centres, shopping and the evening economy

Policy SSE1: Supporting Bristol's centres – network and hierarchy

MM Ref	Respondent	Summary of representations	Council response
MM8.1	143 Alan Gallagher	Supports greater emphasis on centres meeting a range of needs for communities and on making positive use of vacant and underused floorspace.	Support noted.
MM8.2			

Policy SSE2: Development in Bristol's centres

MM Ref	Respondent	Summary of representations	Council response
MM8.3	143 Alan Gallagher	Supports the greater emphasis on centres meeting a range of needs for communities and on making positive use of vacant and underused floorspace.	Support noted.
MM8.4	160 The Westbury on Trym Society	Respondent objects to the main modification on the basis that it is still not justified (and therefore unsound) as it is not an appropriate strategy for dealing with changes of use to residential in town centres. Representation reiterates points raised at EiP that the policy should account for the potential use of Article 4 Directions to prevent Permitted Development Rights for Change of Use of ground floor Class E premises to residential in Primary Shopping Areas. Representation reiterates that the following modification should be added to policy SSE2. ‘Within the primary shopping areas, changes of use	The modified supporting text is considered to address the actions set out in IN8 by explaining how the policy is to function in relation potential future restrictions of permitted development rights, i.e. Article 4 directions. Further modifications to the policy or explanatory text are not considered necessary for reasons of soundness/legal compliance. A similar modification regarding the potential use of Article 4 directions has been made to the explanatory text of policy SSE4: Town centre first approach to development.

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		of ground floor frontages to residential development that require planning permission will not be supported and the council will consider the use of Article 4 Directions to prevent the use of permitted development rights in such areas in appropriate circumstances.'	For clarity, and consistency with MM8.8 paragraph 8.22A, the Council invites the Inspectors to consider a modification to the wording of paragraph 8.13B. The Council invite the Inspectors to consider a further modification for clarity (<u>bold underlined text</u> proposes the additional main modification wording): <u>'The change of use from town centre uses from Class E to residential is currently subject to permitted development rights. In the instance that these permitted development rights are changed or restricted, the policy approach resists the loss of such uses in centres in cases where planning permission is required. If these rights are restricted by any future Article 4 direction, the policy approach set out in the Local Plan resists the loss of these uses in centres in cases where planning permission is required.'</u>
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Policy SSE3: Supporting Bristol's evening, night-time and culture economy

MM Ref	Respondent	Summary of representations	Council response
MM8.5	159 The Theatres Trust	Supports the modification as it meets the tests of both soundness and legal compliance.	Support noted.

Policy SSE4: Town centre first approach to development

No representations received regarding the Main Modifications to Policy SSE4: Town centre first approach to development.

Policy SSE5: Temporary uses in centres

No representations received regarding the Main Modifications to Policy SSE5: Temporary uses in centres.

Policy SSE6: Retaining and enhancing markets

No representations received regarding the Main Modifications to Policy SSE6: Retaining and enhancing markets

Policy SSE7: Provision of public toilets

No representations received regarding the Main Modifications to Policy SSE7: Provision of public toilets.

Policy SSE8: Public houses

No representations received regarding the Main Modifications to Policy SSE8: Public houses.

Chapter 9. Biodiversity and green infrastructure

Chapter introductory section

No representations received regarding the Main Modifications to the Introductory section of Chapter 9: Biodiversity and Green Infrastructure.

Policy BG1: Green infrastructure and biodiversity in new development

MM Ref	Respondent	Summary of representations	Council response
MM.9.1	17 Bristol Tree Forum 41 Tom Carter 38 Katherine Oliver 36 Niko Pierlejewski 63 Gavin Baker 65 Dick Willis 75 Nigel Paul Brown 167 Katherine Maltby	Respondent refers to MM9.1 with concerns regarding discretionary and vague language and lack of obligatory requirements for long-term management of green infrastructure. The representations suggest further amendments to include use of HMMP and unilateral undertaking/ Conservation Covenant as part of BNG requirements and definition for key terms to policy BG1 beyond that which is set out in MM9.1.	Representations concerning policy language and BNG requirements are noted; however, the comments are not considered to be within the scope of this consultation as they do not relate to proposed modified wording.
	175 The Windmill Hill and Malago Planning Group	Respondent objects to lack of full coverage of urban wildlife in policy (examples given to include birds and bats). Respondent objects to discretionary language in policy, suggesting clearer criteria to identify 'important' green infrastructure with suggestion of an explanatory document, and amending provision	Representations in relation to discretionary language of policy and important existing green infrastructure are noted; however, the comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.

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MM Ref	Respondent	Summary of representations	Council response
		for long-term management and maintenance of green infrastructure as a requirement.	
MM9.1	188 Swifts Local Network	Supports the Main Modification as a whole. Suggests further amendments required to make the policy sound, effective and consistent with national policy. The reference to swift bricks should include the required swift brick number as stated in the Natural Environment PPG. Additional wording should be included to point applicants towards further guidance.	Representations are noted; however, the comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.
	129 Camilla Barlow	Representor refers to MM9.1; raising concern that the policy is not sound/effective as inconsistent with the NPPG regarding details about swift bricks.	Representations are noted; however, the comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.
	130 Sue Chubb	Representor refers to MM9.1; regarding the use of discretionary terms, however, the representations suggest further /additional amendments to replace the words 'should' and 'it is expected' with 'required' and 'will' to Policy BG1 which relates to part of the policy which is not subject to proposed modified wording as set out in MM9.1.	Representations are noted; however, the comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.
MM9.2	130 Sue Chubb 17 Bristol Tree Forum 36 Niko Pierlejewski 41 Tom Carter	Request for the wording of 9.1.11 to be changed to add 'including sites of nature conservation interest' added on to the current wording. As well as amending 'West of England Local Nature Strategy' to include 'Mayoral Combined Authority'.	Reference to 'Sites of Nature Conservation' is included within the proposed modified wording, so no further modification is proposed. The explanatory text provides further information on how the requirements

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MM Ref	Respondent	Summary of representations	Council response
	63 Gavin Baker 65 Dick Willis 75 Nigel Paul Brown	Respondent # 130 additionally suggested that 9.1.17 should be amended to remove the word 'voluntary'. All respondents other than #130 sought clarification of local ecological mapping document to ensure integration into local plan.	within Policy BG1 can be met, including voluntary standards. Whilst designated habitats are shown on the Policies Map, wider ecological mapping will be made accessible by the relevant body. None of the further proposed modifications are considered necessary for soundness or compliance reasons.
MM9.2	175 The Windmill Hill and Malago Planning Group	Suggestion to ensure ecological network mapping is clearly identified within Bristol's planning documents.	Representation noted; however, suggested modifications are not considered necessary for soundness or compliance reasons. Whilst designated habitats are shown on the Policies Map, wider ecological mapping will be made accessible by the relevant body.

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Policy BG2: Nature conservation and recovery

MM Ref	Respondent	Summary of representations	Council response
MM9.3	17 Bristol Tree Forum 36 Niko Pierlejewski 41 Tom Carter 63 Gavin Baker 65 Dick Willis 75 Nigel Paul Brown	Representor refers to MM 9.3 with concerns regarding discretionary language and local wildlife impacts and suggest further amendments to set scope of biodiversity mitigation provision as 'within Bristol'. Suggests deletion of 'significantly' harmful impact of development, and deletion of section on irreplaceable habitats so as not to replicate the NPPF.	Representations are noted; however, multiple suggested amendments are not considered to be within the scope of this consultation as they do not relate to the proposed modification. The local plan policies apply within the administrative border of Bristol; therefore, improvements can only be provided for within Bristol. The approach to irreplaceable habitats was considered at examination. This modification addresses the actions set out in IN8, ensuring that the approach is fully consistent with para. 180c) of the NPPF.
	175 The Windmill Hill and Malago Planning Group	Respondent suggests removing 'significant' from harmful impact of development on local wildlife, as is currently too vague and open to interpretation which may lead to unmitigated harm within developments.	The approach to harm and mitigation set out in Policy BG2 is consistent with paragraph 180(a) of the NPPF which confirms that development resulting in significant harm to biodiversity which cannot be appropriately mitigated will not be permitted.
	42 Matthew Morris 79 Tamsin Ashton 122 Sandy Creighton 142 Claire King 167 Kathrine Maltby	Discretionary terms 'should' and 'it is expected that' should be replaced by mandatory terms, as discretionary terms enable developers to take advantage of ambiguity.	Representations are noted; however, the comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.

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MM Ref	Respondent	Summary of representations	Council response
	204 Victoria Park Action Group	Objection to modified wording affording greater discretion to developers.	Modifications were made to ensure consistency with the NPPF in relation to the mitigation hierarchy and the approach to irreplaceable habitats. The modified wording reflects the evidence-based considerations during the examination of the policy at the hearings and is in line with IN8.
	130 Sue Chubb	Representor refers to MM9.3; however, the representations suggest further /additional amendments. The suggested amendments are as follows: to change 'expected to provide mitigation' to 'required to provide mitigation'; to specify 'within Bristol' in 'compensatory improvements elsewhere'; and to delete 'significantly' from the sentence 'development which would have a significantly harmful impact on local wildlife'. All suggested amendments are in Policy BG2 and relate to part of the policy which is not subject to proposed modified wording as set out in MM9.3.	The approach to harm and mitigation and the language used in Policy BG2 is consistent with paragraph 180(a) of the NPPF which confirms that development resulting in significant harm to biodiversity which cannot be appropriately mitigated will not be permitted. Local Plan policies apply within the administrative border of Bristol; therefore, improvements can only be provided for within Bristol.

Policy BG3: Achieving biodiversity gains

MM Ref	Respondent	Summary of representations	Council response
MM9.4	17 Bristol Tree Forum 36 Niko Pierlejewski 38 Katherine Oliver 41 Tom Carter	Respondents query whether policy BG3 adds to existing statutory regime.	The role of the policy, and its relationship with national policy, is set out in modified para. 9.1.26, which clarifies the local context in which statutory BNG requirements are to be implemented.
MM9.5	42 Matthew Morris 63 Gavin Baker 65 Dick Willis	Respondents #42, 79, 122 and 167 raised concerns that the policy contradicts national policy in certain places and suggests minor amendments should be made to ensure there is no conflict with the BNG regime.	Respondents have not identified the areas of conflict; policy BG3 has been drafted for consistency with national policy, therefore no further amendments are considered necessary for reasons of soundness/legal compliance.
MM9.6	75 Nigel Paul Brown 79 Tamsin Ashton 122 Sandy Creighton 167 Katherine Maltby		
MM.9.4	17 Bristol Tree Forum 36 Niko Pierlejewski 38 Katherine Oliver 41 Tom Carter 63 Gavin Baker 65 Dick Willis 75 Nigel Paul Brown	Respondents query whether the reference to the Biodiversity Gain Plan is intended to make the document a pre-requisite of non-exempt planning applications.	The proposed modifications are considered to provide sufficient clarity at MM9.6 at paragraphs 9.1.28-29 that the Biodiversity Gain Report is required at application stage, and the Biodiversity Gain Plan is required prior to commencement of development (secured by condition). Suggestions noted; however, these amendments are not considered to be within

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MM Ref	Respondent	Summary of representations	Council response
		Further suggested wording relating to the reference to national policy and the mitigation hierarchy.	the scope of the consultation as they do not relate to the main modifications.
MM 9.5	17 Bristol Tree Forum 36 Niko Pierlejewski 41 Tom Carter 63 Gavin Baker 65 Dick Willis 75 Nigel Paul Brown 167 Katherine Maltby	Representors suggested amending the modification to identify the habitats where a stated BNG% greater than the statutory minimum would be required. Suggested that including the Biodiversity Gain Hierarchy was not necessary and could create a conflict with statutory requirements. Representors disagreed with the policy text on delivering off-site mitigation. Representors commented that this mitigation can be delivered on any registered Biodiversity Gain Site at the discretion of the developer.	Representations are noted; however, the policy as modified is considered sound as requiring applicants to exceed statutory minimums would not be appropriate, as set out in IN11. The introductory text establishes that the policy as modified sets out local preferences in relation to BNG and the mitigation hierarchy. The policy text sets out one of the ways in which off-site mitigation can be delivered according to the Council's preferences and local biodiversity priorities. This is not intended as a requirement, and as such, no further modifications are considered necessary for reasons of soundness or legal compliance.
MM9.5	175 The Windmill Hill and Malago Planning Group	Representor disagreed with wording in modified policy and suggested additional requirements for development to exceed statutory minimum in BNG provision to support One City aspirations and Bristol Greening City Plan	Representation noted; however, the policy as modified is considered sound as requiring applicants to exceed statutory minimums would not be appropriate, as set out in IN11.
	216 Home Builders Federation	Comments in support of MM9.5.	Support noted.

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MM Ref	Respondent	Summary of representations	Council response
	61 Gregory Allen	BNG is not thorough enough in criteria and calculations considering areas far from the development site.	Representation noted; however, the suggested amendments are not considered to be within the scope of this consultation as they do not relate to the proposed modification and relate instead to the approach as set out in national policy.
	130 Sue Chubb	Concern that the wording ‘developments that seek to secure greater than the minimum will be encouraged’ is too weak. Policy should be amended to identify sites where a higher than minimum percentage will be expected and state the percentage. Concern that if Policy BG3 is retained it must not conflict with the existing statutory regime.	Representation noted; however, the policy as modified is considered sound as requiring applicants to exceed statutory minimums would not be appropriate, as set out in IN11. The role of the policy, and its relationship with national policy, is set out in modified para. 9.1.26 in the introductory text, which clarifies the local context in which statutory BNG requirements are to be implemented.
MM9.6	216 Home Builders Federation	Comments suggest further amendments to modification to include updated DEFRA and MHCLG guidance to ensure alignment with revised national BNG approach as set out in amended Environment Act 2021.	As the policy has been modified to remove duplication of the statutory framework, the approach to BNG set out within the policy reflects only the Council’s preferences as to how developers should carry out the required mitigations. It is not considered that future amendments to national policy will affect the Council’s preference for mitigation to be delivered on-site where possible.

Policy BG4: Trees

MM Ref	Respondent	Summary of representations	Council response
MM.9.7	17 Bristol Tree Forum 36 Niko Pierlejewski 41 Tom Carter 63 Gavin Baker 65 Dick Willis 75 Nigel Paul Brown	Policy should be aligned with BNG requirements for the loss of individual trees habitat. Policy does not take into account the principles of the Mitigation hierarchy. Concerns raised about unspent S106 tree planting agreements. Suggests further amendments to specify that replacement trees should be provided on council-owned land. Noted that BS ID does not match published version. Further wording changes suggested.	Representations noted; however, no additional evidence has been presented which would require the Council to consider an amended approach for reasons of soundness/legal compliance. The policy is considered a reasonable approach that allows flexibility for the availability of planting locations. Suggested amendment to the British Standards reference has been noted for correction and will be corrected to 'BS 5837'. Further suggested amendments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.
MM9.7	167 Katherine Maltby 38 Katherine Oliver 175 The Windmill Hill and Malago Planning Group 130 Sue Chubb	Respondents suggested additional amendments to policy text relating to off-site tree provision.	Representations noted; however, the suggested amendments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.
MM9.7	175 The Windmill Hill and Malago Planning Group	Respondent suggested amended wording to make the loss of ancient woodland/veteran trees acceptable only as a last resort.	Representations noted; however, the suggested amendments are not considered to be within the scope of this consultation as

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			they do not relate to the proposed modification.
MM 9.8	17 Bristol Tree Forum 36 Niko Pierlejewski 41 Tom Carter 63 Gavin Baker 65 Dick Willis 75 Nigel Paul Brown 167 Katherine Maltby	Comments in support of new 9.1.37A section. Representors suggest aligning methodology for calculating tree replacement with BNG methodology for individual trees habitat. Suggest determination of tree loss prior to submission is aligned with BNG Anti-Degradation Rule timings.	Support for modification clarifying relationship with BNG noted. Representation noted; however, suggested amendment is not considered necessary for soundness/legal compliance. The possibility of aligning the time period with BNG standards was considered at examination; no additional evidence has been presented which would require the Council to consider an amended approach for reasons of soundness/legal compliance.
	42 Matthew Morris 79 Tamsin Ashton 122 Sandy Creighton 167 Katherine Maltby 130 Sue Chubb	Offsite tree replacement lacks enforceability, with S106 tree replacements historically unfulfilled. Specific off-site planting locations should be identified at application stage and embedded in any planning grant.	Representations noted; however, the suggested amendments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.

Policy BG6: Private gardens

MM Ref	Respondent	Summary of representations	Council response
MM.9.9	17 Bristol Tree Forum 36 Niko Pierlejewski 41 Tom Carter 63 Gavin Baker	Respondents query how policy should function in regard to development involving front gardens when this is currently classified as permitted development.	Representations noted; however, the suggested amendments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.

	65 Dick Willis 75 Nigel Paul Brown		
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Open Space

General Open Space comments

26 comments were received regarding general expressions of support for Open Space in Bristol. These comments do not relate directly to a Local Plan policy approach, and as such are not considered to be within the scope of this consultation. The list of respondents has been included in the Annex for completeness.

Policy GIA: Open space for recreation

MM Ref	Respondent	Summary of representations	Council response
MM.9.11	17 Bristol Tree Forum 36 Niko Pierlejewski 41 Tom Carter 63 Gavin Baker 65 Dick Willis 75 Nigel Paul Brown 167 Katherine Maltby 175 The Windmill Hill and Malago Planning Group	Respondents raise concerns with discretionary language used in policy and lack of definitions for 'recreation'. Suggest including standards for size and quality of open space within the policy, listing further open space benefits, and that the policy should help secure public access to open spaces not owned by the Council.	Representations noted; however, the suggested amendments are not considered to be within the scope of this consultation as they do not relate to the proposed modification. Standards for open space provision are set out in the relevant Council strategy.

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MM Ref	Respondent	Summary of representations	Council response
MM9.11	170 Bristol Parks Forum	Comments made concerning the use of discretionary language; the meaning of the word ‘appropriate’, used throughout the text, is unclear. Objection to the amended text from ‘in accordance with’ to ‘having regard to’, as the phrase lacks clarity and developers should be required to follow standards within the strategy.	Comment noted; however, suggested amendments are not considered necessary for soundness/legal compliance. The relationship between Policy GIA and relevant strategies has been modified in accordance with the actions set out in IN2. No additional evidence has been presented which would indicate the need for an amended approach for reasons of soundness/legal compliance.
MM9.11	170 Bristol Parks Forum 203 Bristol Civic Society	Objection to the inclusion of text allowing quality improvements to nearby open spaces where achieving the desired quantity of open space for recreation is not possible. Concern it may lead to justification for not delivering high-quality open space within the distance required by the Parks and Green Spaces Strategy. Respondent #203 suggested that the final paragraph of MM9.11 should be deleted or amended to only allow ‘significant and permanent’ quality improvements to nearby open spaces as an alternative in ‘exceptional circumstances’. For exact wording proposed by the respondent please see the full response schedule.	Representation noted; however, suggested further amendments are not considered necessary for soundness/legal compliance. The explanatory text sets out that improvements rather than provision will only be acceptable when desired levels are limited by land availability due to the constrained nature of the urban area. The quality of improvements should have regard to the guidelines set out in the relevant Council strategies.

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MM Ref	Respondent	Summary of representations	Council response
MM9.12	135 Sport England 170 Bristol Parks Forum	Respondents suggest explanatory text should be amended further to specify which additional strategies development should have regard to. Respondent #135 suggested that the text should reference the Playing Pitch Strategy. Respondent #170 suggested that should be amended to state that ‘other strategies exist or will emerge that have relevance to this clause... all of which must be used to determine the provision of Open Recreation Space’.	The Council’s Playing Pitch Strategy has recently been adopted (July 2026) including with the intention to inform the planning of new developments and their on- or off-site contributions to the provision of new, or the enhancement of, recreational space. As such the Council agrees with the respondent that this is a relevant consideration and would welcome a further modification within the explanatory text to improve the effectiveness of the policy. Further references to strategies yet to emerge are not considered necessary for reasons of soundness/legal compliance. The Council invite the Inspectors to consider a further modification for clarity (<u>bold underlined text</u> proposes the additional main modification wording): 9.2.6 The Council’s strategies <u>Parks and Green Spaces Strategy, and Playing Pitch Strategy</u> or their successor documents, provide further guidance on the approach to open space for recreation.

Policy GI1: Local green space

MM Ref	Respondent	Summary of representations	Council response
MM9.13	44 Hayley Ash	Objection to reduction of LGS protections. All green spaces, no matter how small, should be included.	All sites previously identified as Local Green Space have been designated as Reserved Open Green Space, retaining protection under Policy GI2 'Protected Open Space'. Furthermore, smaller open spaces considered 'Incidental Open Space' are also accounted for within a new paragraph, 9.2.16A, of Policy GI2.
MM9.13	28 Stride Brothers Ltd	Objection to the designation of all Local Green Spaces to Reserved Open Green Space.	Following examination, it was reluctantly concluded that the methodology for identifying Local Green Space (LGS) was not soundly based, and as such, it could not be concluded with any certainty that individual designations met the national criteria for the 'Local Green Space' designations. Furthermore, it was noted that many of the sites identified as LGS already benefit from other planning protections because of their heritage and/or biodiversity value. As a result, Policy GI1 'Local Green Space' and the LGS designations are proposed to be deleted in line with inspectors' advice as detailed in IN10. All LGS sites were subsequently assessed under the ROGS criteria and proposed for designation as ROGS as a main modification (assessment can be found at EXA061 BCC)

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MM Ref	Respondent	Summary of representations	Council response
			Examination Note: Protected Open Space). The representation is noted, however, the representation provided does not alter the conclusion that the designation as modified is sound as it meets the ROGS criteria.
MM9.13	68 Bruce Turner	Objection to the removal of Policy GI1. The modification will remove the distinction between ordinary green space and green space of exceptional local importance, creating uncertainty/ ambiguity about future planning decisions on valued sites.	All sites previously identified as Local Green Space will now be designated as Reserved Open Green Space, retaining protection from inappropriate development under Policy GI2 'Protected Open Space'. Many sites have additional designations because of their heritage or biodiversity value.
MM9.13	170 Bristol Parks Forum	Justification should be provided for the inspectors' rejection of LGS. Removal of LGS is counter to the consultation carried out regarding the protection of sites.	The need for the removal of LGS designations was considered at examination and is explained in detail in IN10 Further exercises to identify sites which meet the LGS criteria, including gathering evidence and carrying out consultations, have not been possible within the examination timeframe. As such the Council has reluctantly concluded that LGS designations need to be deleted at this stage. However, the Council was invited to consider whether the areas previously identified as LGS fell under the NPPF definition of open space and thus could be reverted to Reserved Open

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MM Ref	Respondent	Summary of representations	Council response
			Green Space status. This exercise was undertaken and is set out in EXA061 BCC Examination Note: Protected Open Space (available here: EXA061 BCC Examination Note: Protected Open Space (pdf, 704 KB)). As the Local Plan is subject to immediate review, there may be the opportunity to carry out sufficient evidence gathering and public consultation as part of this process to identify and designate sites that meet the LGS definition. It should, however, be noted that the Local Green Space designation is specific in its definition, meaning not all open spaces of public value will meet its criteria. Nevertheless, the Council is committed to ensuring appropriate protection of open spaces, not just those that meet the LGS criteria.
MM9.13	179 Lucy Wyatt 186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	No guidance on the definition for an 'extensive tract of land' as detailed as a criterion NPPF. Concern the lack of definition may have created ambiguity in determining whether the approach taken when assessing LGS was correct.	Whilst there is no definition of 'extensive tract of land' within the NPPF, the inspectors concluded that given many of the designations are of a significant scale and may also adjoin one another, this would effectively create larger continuous areas of LGS, contrary to national guidance. Further details are set out

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MM Ref	Respondent	Summary of representations	Council response
			within IN10: Inspectors' Interim Post Hearing Advice.
MM9.13	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE 170 Bristol Parks Forum	Having Registered Open Green Space or SNCI designation does not adequately protect the sites from inappropriate development.	The Council is sympathetic to the disappointment that many feel about the removal of Policy GI1 'Local Green Space' and the change in designation of areas previously identified as LGS. Following the deletion of Local Green Space designation, all sites previously identified as LGS were assessed and demonstrated to meet the NPPF definition of open space and could be designated as Reserved Open Green Space. The ROGS designation retains protection from inappropriate development under Policy GI2 'Protected Open Space'. The explanation section of Policy GI2 sets out that any development proposals that would result in the loss or reduction of Reserved Open Green Space through development will be required to fully justify the proposal and demonstrate clearly why the space is no longer needed for an open space function. Policy BG2 deals with nature conservation and recovery, setting out a hierarchy of designated sites, the SNCI designation is included within this hierarchy and protected accordingly.

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MM Ref	Respondent	Summary of representations	Council response
			Given the proposed designation of all previously LGS sites as RSOGs (with many also benefitting from other protections), it is considered unlikely that these changes would result in risk from inappropriate development.
MM9.13	203 Bristol Civic Society	Agreement that LGS should not be reviewed further currently, however, planning officers should consider whether this designation is applicable in future work.	Support noted. As the Local Plan is subject to immediate review, there may be opportunity to carry out sufficient evidence gathering and public consultation as part of this process to identify and designate sites that meet the LGS definition. It should, however, be noted that the Local Green Space designation is specific in its definition, meaning not all open spaces of public value will meet its criteria. Nevertheless, the Council is committed to ensuring appropriate protection of all open spaces, not just those that meet the LGS criteria.
MM9.13	17 Bristol Tree Forum 31 Tom Bickerseth 36 Niko Pierlejewski	Respondents objected to the removal of LGS designation protections. The removal of LGS designations reduces protections for Bristol's Green Spaces. LGS should be retained in principle,	Following examination, it was reluctantly concluded that the methodology for identifying Local Green Space (LGS) was not soundly based, and as such, it could not be

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MM Ref	Respondent	Summary of representations	Council response
MM9.13	41 Tom Carter 42 Matthew Morris 56 Hannah Klewin 63 Gavin Baker 65 Dick Willis 75 Nigel Paul Brown 79 Tasmin Ashton 101 Deborah Hurst 167 Katherine Maltby 130 Sue Chubb 186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE 179 Lucy Wyatt 29 Chris Hutt 33 Cameron Millar 39 Terra Glowach 46 Andrew Chappel 49 Amanda Gilroy 62 Roseanne Roberts 68 Bruce Turner 70 Nigel Shipley	with evidence and consultations informing whether sites should remain in the LGS designation. Reference to principle of LGS in made neighbourhood plans. Respondent #186 and #179 suggested an alternative of including a call for immediate review of the use of LGS within the Local Plan	concluded with any certainty that individual designations met the national criteria for the 'Local Green Space' designations. Furthermore, it was noted that many of the sites identified as LGS already benefit from other planning protections because of their heritage and/or biodiversity value. As a result, Policy GI1 'Local Green Space' and the LGS designations are proposed to be deleted. As the Local Plan is subject to immediate review, there may be opportunity to carry out sufficient evidence gathering and public consultation as part of this process to identify and designate sites that meet the LGS definition. It should, however, be noted that the Local Green Space designation is specific in its definition, meaning not all open spaces of public value will meet its criteria. Nevertheless, the Council is committed to ensuring appropriate protection of all open spaces, not just those that meet the LGS criteria.

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MM Ref	Respondent	Summary of representations	Council response
	79 Tamsin Ashton 80 Adrian Kramarzyk 84 Kathryn Chiswell Jones 88 Christine Crowe 94 Stephen Mansbridge 104 Ellis François Morton 110 Lizzie Snelling 122 Sandy Creighton 142 Claire King 163 Friends of Badocks Wood 166 Friends of Royate Hill Local Nature Reserve 167 Katherine Maltby 170 Bristol Parks Forum 172 Rosemary Collins 175 The Windmill Hill and Malago Planning Group		

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MM Ref	Respondent	Summary of representations	Council response
	198 Redland Green Community Group		
MM9.13	37 Bernardita Munoz 40 Emma Peddie 46 Andrew Chappel 49 Amanda Gilroy 56 Hannah Klewin 62 Roseanne Roberts 71 Sophie Dawson 84 Kathryn Chiswell Jones 88 Christine Crowe 94 Stephen Mansbridge 104 Ellis François Morton 110 Lizzie Snelling 150 Siobhan Dolan 167 Katherine Maltby 130 Sue Chubb	Concern that the removal/weakening of LGS protections would have implications for biodiversity/nature.	The Council is sympathetic to the disappointment that many feel about the removal of Policy GI1 'Local Green Space' and the change in designation of areas previously identified as LGS. Following the deletion of Local Green Space designation, all sites previously identified as LGS were assessed and demonstrated to meet the NPPF definition of open space and could be designated as Reserved Open Green Space. The ROGS designation retains protection from inappropriate development under Policy GI2 'Protected Open Space'. Policy BG2 deals with nature conservation and recovery, setting out a hierarchy of designated sites, the SNCI designation is included within this hierarchy and protected accordingly. Given the proposed designation of all previously LGS sites as RSOGs (with many also benefitting from other protections), it is considered unlikely that these changes would result in risk from inappropriate development.
MM9.13	46 Andrew Chappel 71 Sophie Dawson	Concern that the removal/weakening of LGS protections would have implications for climate	The Council is sympathetic to the disappointment that many feel about the

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MM Ref	Respondent	Summary of representations	Council response
	88 Christine Crowe 04 Ellis François Morton 172 Rosemary Collins 110 Lizzie Snelling 167 Katherine Maltby 39 Terra Glowach 40 Emma Peddie 61 Gregory Allen 82 David Baines 101 Deborah Hurst 142 Claire King 167 Katherine Maltby 175 The Windmill Hill and Malago Planning Group 205 Catriona Mellor 206 Rebecca Whalley	resilience and is counter to BCC's climate and biodiversity commitments and strategies	removal of Policy GI1 'Local Green Space' and the change in designation of areas previously identified as LGS. Following the deletion of Local Green Space designation, all sites previously identified as LGS were assessed and demonstrated to meet the NPPF definition of open space and could be designated as Reserved Open Green Space. The ROGS designation retains protection from inappropriate development under Policy GI2 'Protected Open Space'. Given the proposed designation of all previously LGS sites as RSOGs (with many also benefitting from other protections), it is considered unlikely that these changes would have implications for climate resilience or the Council's biodiversity commitments.
MM9.13	40 Emma Peddie 46 Andrew Chappel 49 Amanda Gilroy 56 Hannah Klewin 71 Sophie Dawson	Concern that the removal/weakening of LGS protections would have implications for wellbeing/the community	The Council is sympathetic to the disappointment that many feel about the removal of Policy GI1 'Local Green Space' and the change in designation of areas previously identified as LGS.

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MM Ref	Respondent	Summary of representations	Council response
	76 Max Hogg 84 Kathryn Chiswell Jones 88 Christine Crowe 94 Stephen Mansbridge 104 Ellis François Morton 110 Lizzie Snelling 150 Siobhan Dolan 167 Katherine Maltby 172 Rosemary Collins 183 Friends of Horfield Common 206 Rebecca Whalley 130 Sue Chubb		Following the deletion of Local Green Space designation, all sites previously identified as LGS were assessed and demonstrated to meet the NPPF definition of open space and could be designated as Reserved Open Green Space. The ROGS designation retains protection from inappropriate development under Policy GI2 'Protected Open Space'. Given the proposed designation of all previously LGS sites as RSOGs (with many also benefitting from other protections), it is considered unlikely that these changes would have implications for wellbeing/the community.
MM9.13	39 Terra Glowach 42 Matthew Morris 46 Andrew Chappel 56 Hannah Klewin 68 Bruce Turner 122 Sandy Creighton 167 Katherine Maltby	The removal of LGS policy is not justified or consistent with national policy	The inspectors set out in IN10 that the Council is not obliged to designate any land as LGS and the reasons why the methodology for identifying LGS sites was not soundly based. The Council therefore reluctantly concluded, it could not sufficiently demonstrate that individual designations met the national

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MM Ref	Respondent	Summary of representations	Council response
	205 Catriona Mellor 130 Sue Chubb 82 David Baines 206 Rebecca Whalley 43 Yhonet Garcia 142 Claire King 198 Redland Green Community Group 170 Bristol Parks Forum 38 Katherine Oliver		criteria for the 'Local Green Space' designations. The inspectors noted the requirement within national policy for LGS to be 'demonstrably' special to the local community. Furthermore, it was noted that many of the sites identified as LGS already benefit from other planning protections because of their heritage and/or biodiversity value. As a result, Policy GI1 'Local Green Space' and the LGS designations are proposed to be deleted.
MM9.13	46 Andrew Chappel 49 Amanda Gilroy 68 Bruce Turner 83 Amy Finnimore 96 Britt Timmerman 104 Ellis François Morton 110 Lizzie Snelling 141 Guy Malkerson 175 The Windmill Hill and Malago Planning Group 179 Lucy Wyatt	Objection to the modification removing GI1. Suggestion that LGS designation should be retained.	The Council is sympathetic to the disappointment that many feel about the removal of Policy GI1 'Local Green Space' and the change in designation of areas previously identified as LGS. Following the deletion of Local Green Space designation, all sites previously identified as LGS were assessed and demonstrated to meet the NPPF definition of open space and could be designated as Reserved Open Green Space. The ROGS designation retains protection from inappropriate development under Policy GI2 'Protected Open Space'.

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MM Ref	Respondent	Summary of representations	Council response
	183 Friends of Horfield Common 186 Knowle West Regeneration Residents Planning Group and Knowle West Future 198 Redland Green Community Group 204 Victoria Park Action Group 170 Bristol Parks Forum		Given the proposed designation of all previously LGS sites as RSOGs (with many also benefitting from other protections), it is considered unlikely that these changes would result in risk from inappropriate development and cannot be retained.
MM9.13	163 Friends of Badock's Wood 101 Deborah Hurst	Objection to specific sites no longer designated as LGS	The inspectors set out in IN ... the reasons why the methodology for identifying LGS sites was not soundly based. The Council therefore reluctantly concluded, it could not sufficiently demonstrate that individual designations, including those highlighted by the respondents, met the national criteria for the 'Local Green Space' designations. The inspectors noted the requirement within national policy for LGS to be 'demonstrably' special to the local community and that there is no obligation on the Council to identify any LGS sites.

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MM Ref	Respondent	Summary of representations	Council response
			Following the deletion of Local Green Space designation, all sites previously identified as LGS were assessed and demonstrated to meet the NPPF definition of open space and could be designated as Reserved Open Green Space. The ROGS designation retains protection from inappropriate development under Policy GI2 'Protected Open Space'. Given the proposed designation of all previously LGS sites as RSOGs (with many also benefitting from other protections), it is considered unlikely that these changes would result in risk from inappropriate development.
MM9.13	147 Homes England	Supports the deletion of Policy GI1 (Local Green Space).	Support noted.
MM9.13	117 Cat Dimond	Objection to modifications to protections for open space, as removal of even small areas of greenspace will impact character, people's health and wildlife.	The inspectors set out in IN10 the reasons why the methodology for identifying LGS sites was not soundly based. The Council therefore reluctantly concluded, it could not sufficiently demonstrate that individual designations met the national criteria for the 'Local Green Space' designations. Following the deletion of Local Green Space designation, all sites previously identified as LGS were assessed and demonstrated to meet

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MM Ref	Respondent	Summary of representations	Council response
			the NPPF definition of open space and could be designated as Reserved Open Green Space. The ROGS designation retains protection from inappropriate development under Policy GI2 ‘Protected Open Space’. With regards to smaller open space, these are defined in Policy GI2 as Incidental Open Space and protected accordingly. For these reasons it is considered unlikely that these changes would have implications for the character of the sites, people’s health and wildlife.

The Council received 52 additional comments regarding Policy GI1 but made in reference to Examination Note EXA061. The Council has provided brief responses to these in the ‘Supporting documents’ section.

Policy GI2: Protected Open Space

MM Ref	Respondent	Summary of representations	Council response
MM9.15 MM9.16 MM9.17	17 Bristol Tree Forum 36 Niko Pierlejewski 41 Tom Carter 63 Gavin Baker 65 Dick Willis 75 Nigel Paul Brown	Respondents refer to MM9.15 to MM9.17, raising concerns that the Bristol Open Space Provision Standards to identify Incidental Residential Green Space has not been applied in the GI2 assessment, as well as concern that the modifications do not consider all types of open space, such as those not publicly accessible. The representations also	MM9.15-MM9.17 do not relate to Incidental Residential Green Space, instead incorporating Policy GI3: Incidental Open Space into Policy GI2. The definition and assessment of the local importance of Incidental Open Spaces remains the same. As such the comments are not considered to be

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MM Ref	Respondent	Summary of representations	Council response
		suggest further amendments to Policy GI2 which relate to the part of the policy which is not subject to proposed modification wording as set out in MM9.15 to MM9.17. Objection that modifications do not include the Bristol Parks and Green Spaces Strategy and Bristol Open Space Provision standards. Suggests clarity around sites included in the Space Standards will be protected by Open Space policies in the local plan. BTF also highlight the need for clarity around the term 'Protected Open Green Space' indicating that it has been used in error.	within the scope of this consultation as they do not relate to the proposed modifications. See MM9.17 which includes the Council's Parks and Green Spaces Strategy or any other relevant successor document (the Bristol Open Space Provision standards are contained within this document). Protected open space refers to the title of Policy GI2, whereas Reserved Open Green Space refers to the designation applied to relevant sites. The use of the term 'Protected Open Green Space' is an error and will be amended.
MM9.16	147 Homes England	The Main Modifications have not sufficiently clarified how this restrictive policy designation is to be applied to the Brislington Meadows site, where the policy map acknowledges the extant outline permission. It is inappropriate to designate this site as 'Protected Open Space', given the need to maximise housing delivery, meaning the policy is not positively prepared. The evidence base for the proposed policy lacks robustness. The policy is not positively prepared, sound, or effective.	These comments are noted and were raised previously in response to the examination hearings. The suggested amendments to Policy GI2 have already previously been considered and were not deemed necessary to make the policy sound or legally compliant.

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MM Ref	Respondent	Summary of representations	Council response
MM9.15	17 Bristol Tree Forum 53 Ross Cannell 101 Deborah Hurst 175 The Windmill Hill and Malago Planning Group	Concern that there is no official map in connection with Incidental Open Space, preventing the protection of these spaces from development.	Incidental Open Spaces have not been identified/designated/shown on the Policies Map at any stage of Local Plan preparation for the reasons explained by modified paragraph 9.2.16.
	175 The Windmill Hill and Malago Planning Group	Respondent commented on the inability to use/maintain these spaces without an official map/register.	Incidental Open Spaces have not been identified/designated/shown on the Policies Map at any stage of Local Plan preparation. These comments therefore do not relate to a proposed modification and fall outside of the scope of this consultation.
	175 The Windmill Hill and Malago Planning Group	Respondent raised concern that there was no mention of wildlife habitats or biodiversity. Raised concerns about false reporting to secure development in addition to suggesting preventative measures.	Deleted Policy GI3: Incidental Open Space made no reference to wildlife habitats or biodiversity. MM9.15 incorporates paragraphs 9.2.20 and 9.2.21 of Policy GI3 text, the consideration for wildlife and biodiversity remains unchanged. These comments therefore fall outside of the scope of this consultation.
MM9.16	42 Matthew Morris 53 Ross Cannell 175 The Windmill Hill and Malago Planning Group	Objection to the removal of the first condition requiring demonstration that 'the open space is no longer required for its open space function' prior to development. Concern this modification would result in green spaces becoming available for development.	It is considered that if an open space is no longer required for its function (criterion (i)), then it automatically will not be creating a deficiency in open space provision (criterion (ii)). As such, it is not considered necessary to have both criteria, and the two have been

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MM Ref	Respondent	Summary of representations	Council response
	205 Catriona Mellor 206 Rebecca Whalley 198 Redland Green Community Group 101 Deborah Hurst 119 Louise Banbury 92 Susan Philpott 198 Redland Green Community Group 17 Bristol Tree Forum 36 Niko Pierlejewski 41 Tom Carter 63 Gavin Baker 65 Dick Willis 75 Nigel Paul Brown		rationalised. The loss of criterion (i) is therefore not considered to weaken the policy. This rationalisation of criteria (i) and (ii) comes as a result of modifications requested by the inspectors as detailed in IN8: Action Points Matters 5-15 (Weeks 3-5).
MM9.16	101 Deborah Hurst 42 Matthew Morris 119 Louise Banbury 92 Susan Philpott 17 Bristol Tree Forum 36 Niko Pierlejewski 41 Tom Carter 63 Gavin Baker 65 Dick Willis	Concern that the policy GI2 now requires either condition ii or iii where it used to require both i and ii. Concern these modifications weaken the protections for green space.	It is considered that if an open space is no longer required for its function (criterion (i)), then it automatically will not be creating a deficiency in open space provision (criterion (ii)). As such, it is not considered necessary to have both criteria, and the two have been amalgamated. The change is therefore not considered to weaken the policy. The changes ensure consistency with Paragraph 99 of the NPPF, 2023.

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MM Ref	Respondent	Summary of representations	Council response
	75 Nigel Paul Brown 167 Katherine Maltby		
MM9.15	17 Bristol Tree Forum 36 Niko Pierlejewski 41 Tom Carter 63 Gavin Baker 65 Dick Willis 75 Nigel Paul Brown 167 Katherine Maltby	Respondents raise risk of not having a baseline survey of incidental open space sites so risk of deficiency in open space provision being poorly assessed without baseline survey of incidental sites.	Deleted Policy GI3: Incidental Open Space did not include the requirement for a baseline survey. MM9.15 incorporates paragraphs 9.2.20 and 9.2.21 of Policy GI3 text, the requirement for a baseline survey remains unchanged. These comments therefore fall outside of the scope of this consultation.
MM9.16	116 Luke Goaman-Dodson 101 Deborah Hurst 92 Susan Philpott 58 Isabelle Cochrane 17 Bristol Tree Forum 36 Niko Pierlejewski 41 Tom Carter 63 Gavin Baker 65 Dick Willis 75 Nigel Paul Brown 167 Katherine Maltby 117 Cat Dimond	Concern that the definition of ‘equivalent or better’ lacks clarity, is vague and open to interpretation. Respondent #58 references vague wording without providing specific examples. Concern the various interpretations make enforcement impossible. Respondent #116 additionally referenced the wording of ‘Incidental Open Space’ as being vague and easily distorted.	The relevant wording in MM9.16 is consistent with the National Planning Policy Framework, 2023, paragraph 99b. The reason for the modification is to ensure the policy accurately reflects the relevant paragraphs in the NPPF, 2023, as detailed in IN8. Incidental Open Space is defined in paragraph 9.2.16a, MM9.15, this definition has been incorporated from deleted Policy GI3. Further amendments are not considered necessary for soundness and compliance reasons.

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MM Ref	Respondent	Summary of representations	Council response
MM9.16	170 Bristol Parks Forum	Consideration that the wording of Policy GI2 lacks clarity as to whether it refers to open space or open green space, the word 'green' should be included to protect green spaces. Objection to MM9.16 sub paragraph iii as it suggests that existing local green space could be removed and provided elsewhere.	The proposed modification to add the word 'green' to the name of Policy GI2 is not considered necessary for soundness or compliance reasons. The relevant wording in MM9.16 paragraph iii is consistent with the National Planning Policy Framework, 2023, paragraph 99b, (with reference to IN8: Inspectors Action Note 2).
MM9.16	175 The Windmill Hill and Malago Planning Group	Respondent refers to MM9.16 ; raising concern that there is no test for deficiency of open space. The representation suggest further /additional amendments to Policy GI2 which relate to a part of the policy which is not subject to proposed modified wording as set out in MM9.16. Concern for the wording within MM9.16: no identification of when open space is deemed to meet a function; and use of the term 'better' is subjective.	The concern is noted. However, the comments are not considered to be within the scope of this consultation as they do not relate to a proposed modification. The definition of open space and when it can be deemed to meet a function is set out in the NPPF and therefore does not need to be replicated in the local plan. Paragraph iii of the policy text for GI2 reflects the exceptions outlined within the NPPF, 2023 detailing when development of an existing open space may be acceptable. The wording within paragraph iii of GI2 stating 'equivalent or

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MM Ref	Respondent	Summary of representations	Council response
		Disagreement with the reason given for the removal of condition (i) 'if i was true then ii is automatically true'. Concern the policy is not in line with BCC aspirations in the One City Plan or Bristol Greening City Plan.	better' is consistent with paragraph 99b of the NPPF, 2023. Comment noted, however IN8 advised the Council to rationalise condition i and ii in order to make the policy sound. Comments noted, however they are not considered to be within the scope of this consultation as they do not relate to a proposed modification.
MM9.16	205 Rebecca Whalley	Concern that the new policy conditions are open to interpretation in a way that is detrimental to local communities. The wording of iii needs clarifying as to what a 'suitable location' is and its accessibility to the local community; concern the replacement green space will be far from the community losing green space. Additional concern the replacement green space will not be provided. The onus should not be on local communities to 'identify and protect green areas of particular importance' as set out within the NPPF. The modifications are not sound and will have a detrimental impact on Bristol's communities.	The conditions were modified in line with the inspectors' concerns for consistency with national policy, as detailed in IN8. The modified wording in MM9.16 reflects that of the National Planning Policy Framework, 2023, paragraph 99b and 99c. The above modifications were carried out in order to ensure that the Local Plan is sound. All sites previously identified as LGS are proposed to be protected from inappropriate development under ROGS designation. Many of these sites benefit from additional policy protection as a result of their biodiversity or heritage value.

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MM Ref	Respondent	Summary of representations	Council response
MM9.16	203 Bristol Civic Society	The first line in MM9.16 should be reverted to 'reserved'; the policies map does not identify Protected Open Space.	The wording detailed in MM9.16 indicates the change in policy title, which is as follows, Policy GI2: Protected Open Space. Policy GI2 deals with Reserved Open Green Space designation as well as Incidental Open Space. Designation titling inconsistencies have been noted for correction.
MM9.16	215 Bristol Grammar School	Comment in support of distinction between LGS and ROGS and that site should not be designated as LGS. Respondent raises concern that previous suggested amendments have not been incorporated into the MMs in Policy GI2. Suggested amendments include objection to designation of whole site (Golden Hill) as ROGS, suggesting boundary amendment to release portion of land from designation. Suggestion to include a previous draft third criteria: <i>“‘iii) when judged against current use, the loss would be mitigated through a comprehensive redevelopment of existing underused open space including securing a community use agreement to enhance public availability”.</i>	Support noted. Suggested amendments to Policy GI2 are not considered necessary to make the policy sound or legally compliant. Golden Hill is considered to meet the criteria for Reserved Open Green Space, designation is considered appropriate, Details of the assessment process for ROGS is set out within TPC005. Additionally, the promoted site has already been considered for its potential to contribute to the housing supply through the SHLAA and found to be unsuitable. Respondent raises concerns that previously suggested amendments have not been incorporated. The representation does not present additional evidence which has not already been considered as part of the

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MM Ref	Respondent	Summary of representations	Council response
		Objection to commentary in Statement of Consultation (Publication Version 2023) as lack of justification for minimal changes to policy and not pursuing draft third condition.	examination on why this is necessary for soundness. The criteria in MM9.16 is proposed to reflect the criteria for development as set out within paragraph 99 of the National Planning Policy Framework, 2023. Any additional criteria would be inconsistent with the relevant paragraphs in the NPPF. Objection to the commentary in the Statement of Consultation is noted. As this does not relate to a document that was subject to the main modification consultation, it is beyond the scope of this consultation.
MM9.17	164 Save Bristol Gardens Alliance Limited	Policy GI2 is an unsatisfactory response to the removal of the LGS designation weakening the protection of existing green spaces. The revised Local Plan must be congruent with adopted environment-led Council policy objectives. The application of GI2 as proposed is unclear. Bristol Zoo Gardens, intended under a planning grant to remain as 'public open space', are not mapped as such.	The Council is sympathetic to the disappointment that many feel about the removal of Policy GI1 'Local Green Space' and the change in designation of areas previously identified as LGS. Following the deletion of Local Green Space designation, all sites previously identified as LGS were assessed and demonstrated to meet the NPPF definition of open space and could be designated as Reserved Open Green Space. The ROGS designation retains protection from inappropriate development under Policy GI2 'Protected Open Space'.

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MM Ref	Respondent	Summary of representations	Council response
			Policy BG2 deals with nature conservation and recovery, setting out a hierarchy of designated sites, the SNCI designation is included within this hierarchy and protected accordingly. Given the proposed designation of all previously LGS sites as RSOGs (with many also benefitting from other protections), it is considered unlikely that these changes would result in risk from inappropriate development.

Policy GI3: Incidental open spaces

No representations received regarding the Main Modifications to Policy GI3: Incidental open spaces.

Representations regarding Incidental Open Spaces are addressed under Policy GI2, due to the modification to incorporate elements of the deleted Policy GI3 into Policy GI2.

Policy GI4: Stapleton allotments and holdings – food growing Green Space

No representations received regarding the Main Modifications to Policy GI4: Stapleton allotments and holdings – food growing Local Green Space.

Chapter 10. Transport

Policy T1: Development and transport principles

MM Ref	Respondent	Summary of representations	Council response
MM10.1	143 Alan Gallagher	Expressed support for strengthening transport policies regarding sustainable travel, public transport, safe access and clarity around delivery.	Support noted.

Policy T2: Transport infrastructure improvements

MM Ref	Respondent	Summary of representations	Council response
MM10.2	143 Alan Gallagher	Expressed support for strengthening transport policies regarding sustainable travel, public transport, safe access and clarity around delivery.	Support noted.

Policy T2A: Protected transport and movement routes

MM Ref	Respondent	Summary of representations	Council response
MM10.3	195 Old Market Community Association	Requested the review of a Rail Infrastructure safeguarded site at Barrow Road and to consider designating the site as a safeguarded Transport Link.	MM10.3 sets out the Council's position should the development sites safeguarded in Policy T2A not come forward during the plan period. Undelivered schemes and the necessity of the safeguarded land will be re-evaluated in future local plan reviews.

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Policy T3A: Transport development management

MM Ref	Respondent	Summary of representations	Council response
MM10.4	143 Alan Gallagher	Expressed support for strengthening transport policies regarding sustainable travel, public transport, safe access and clarity around delivery.	Support noted.
	196 National Highways	Strongly supported the greater emphasis on road safety in Policy T3A as a result of MM10.4 and in particular, the updated wording to reflect the requirement for development proposals to mitigate cumulative residual impacts on the highway network.	Support noted.

Policy T4A: Parking, servicing and the provision of infrastructure for electric vehicles

MM Ref	Respondent	Summary of representations	Council response
MM10.6	203 Bristol Civic Society	Raised issue of T4A Policy Text referring to further guidance which will be set out in a Transport Supplementary Planning Document.	Representation noted. The Council invite the Inspectors to consider a further modification for clarity (<u>bold underlined text</u> proposes the additional main modification wording): To replace the references to the 'Transport SPD', in the Policy Text and paragraphs 10.38 and 10.39 of the explanatory text, with ' <u>The Council's transport guidance documents</u> '.

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Policy T5: Public rights of way

No representations received regarding the Main Modifications to Policy T5: Public rights of way.

Policy T6: Active travel routes

MM Ref	Respondent	Summary of representations	Council response
MM10.9	143 Alan Gallagher	Expressed support for strengthening transport policies regarding sustainable travel, public transport, safe access and clarity around delivery.	Support noted.

Chapter 11. Community facilities

Policy CF1: Provision of community facilities

MM Ref	Respondent	Summary of representations	Council response
MM11.2	143 Alan Gallagher	Expressed support for major developments to contribute towards the provision of community facilities.	Support noted.
MM11.3			
MM11.2	149 NHS Integrated Care Board (BNSSG)	Follows comments made at Regulation 19. Respondent supports the premise of the policy whilst acknowledging that the text is flexible in allowing the NHS to deliver services. Supports the addition of text which sets out other suitable locations. Respondent raises concerns about the deliverability of the modifications seeking a proportion of ground floor space for community use. These are not suitably evidenced elsewhere in the Plan and are not demonstrated to be practical in securing contributions to the infrastructure necessary to support housing.	Support noted. The figure of 10% ground-floor space made available for community and /or cultural uses is referred to in the City Centre Development and Delivery Plan (EXA008), outlining the council's strategy to secure this provision of new ground-floor community and cultural uses with affordable rents in new developments. The council considers that MM11.2 and MM11.3 (which see the 10% figure relocated from the policy text to the explanatory text, and modification to introduce off-site contribution options) provides the clarity and flexibility to ensure the policy is deliverable.
MM11.3			

Policy CF2: Retention of community facilities

MM Ref	Respondent	Summary of representations	Council response
MM11.5	149 NHS Integrated Care Board (BNSSG)	Follows comments made at Regulation 19. Respondent does not find the proposed modifications to be sound. MM11.5 introduces a requirement for suitable evidence to be submitted for any proposal involving the loss of a community facility. Requiring NHS disposal sites to produce evidence adds unjustified delays to community provision. Policy should support the principle of alternative uses for NHS sites with no costly and timely requirements.	Policy CF2 aims to avoid the loss of community facilities or land unless certain provisions are demonstrated.
MM11.6			MM11.5 proposes additional text, setting out the expectation that suitable evidence will be submitted as part of any proposal, to explain how these matters will be secured. The inclusion of this modification is considered to be justified and necessary to make the policy sound. Previous representation was received proposing modifications to allow healthcare facilities flexibility in its site disposals procedure. The representations received for this consultation relate to the additional requirement to submit suitable evidence for proposals involving the loss of a community facility. Whilst the response does relate to MM11.5, the justification, to allow healthcare facilities flexibility in site disposal procedure remains the same and has been considered at examination. The previously proposed modifications were not considered necessary to make the plan sound at examination stage.

Chapter 12. Net zero and climate

Policy NZC1: Climate change, sustainable design and construction

MM Ref	Respondent	Summary of representations	Council response
MM12.2	184 Sovereign Network Group	Modifications add requirements on the performance of fixtures and fittings and details of water recycling systems, expanded on further in para. 12.1.13. New requirements should not be introduced at this stage.	Representation noted; however, comments provided do not alter the conclusion that policy NZC1 as modified is sound.
MM12.3			As set out in IN10, appropriate requirements from deleted policy NZC4 have been retained and rationalised within NZC1. Policy NZC4 stated that applicants should include ‘Demonstration of how water supplies will be conserved’. The need to expand on these requirements was addressed at examination, when it was suggested that the policy should make explicit what aspects of water consumption should be demonstrated. No additional standards have been set for the performance of fixtures and fittings, beyond the expectation to meet the optional requirement of 110 litres per person per day, a requirement which has not been introduced through a main modification. The additional information in the explanatory text at 12.1.13 suggests ways in which water efficiency can be improved and is intended as guidance rather than exact requirements.

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MM Ref	Respondent	Summary of representations	Council response
MM12.2	216 Home Builders Federation	Concerns remain about the cumulative impact of increasing policy requirements, especially those that go further and faster than Building Regulations and Future Homes Standard, which together can make delivery and viability challenging.	Representations noted; however, comments provided do not alter the conclusion that policy NZC1 as modified is sound. No additional evidence that requires the policy approach to be amended has been provided as to how the requirements expressed in the policy as modified introduce or do not address issues of soundness.
MM12.2	219 Unite Group PLC	The proposed policy wording clarifying the approach to sustainable designs standards, climate change adaptation, managing heat risk, and water efficiency, means the policy remains onerous in terms of what is required for development.	Representations noted; however, comments provided do not alter the conclusion that policy NZC1 as modified is sound. No additional evidence that requires the policy approach to be amended has been provided as to how the requirements expressed in the policy as modified introduce or do not address issues of soundness.

Policy NZC2: Energy efficient buildings – operational carbon

MM Ref	Respondent	Summary of representations	Council response
MM12.6	184 Sovereign Network Group	The modification should be amended further to reflect Inspectors' advice that the requirement to connect to a district heat network depends on viability in addition to feasibility. Suggests the inclusion of 'and viable' following references to 'feasible'.	Representation noted. As stated in IN11, the proposed modifications address the need to consider viability as set out in IN10.

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MM Ref	Respondent	Summary of representations	Council response
			Further amendments are not considered necessary for reasons of soundness/legal compliance.
MM12.6	216 Home Builders Federation	Concerns remain about the cumulative impact of increasing policy requirements, especially those that go further and faster than Building Regulations and Future Homes Standard, which together can make delivery and viability challenging.	Representations noted; however, comments provided do not alter the conclusion that policy NZC2 as modified is sound. No additional evidence that requires the policy approach to be amended has been provided as to how the requirements expressed in the policy as modified introduce or do not address issues of soundness.
MM12.6	219 Unite Group PLC	Suggests that the policy should specify whether the maximum energy use intensity includes both regulated and unregulated loads, noting that the standard is virtually impossible to achieve in the event that both are included, and noting that national policy does not operate on this basis. Suggests further amendments allowing for off-site provision to include provision from REGO-backed energy suppliers.	Representation noted; however, comments provided do not alter the conclusion that policy NZC2 as modified is sound. The proposed modification reflects the Written Ministerial Statement of December 2023, and as such no longer specifies a maximum energy use intensity. The policy as modified now requires a reduction in the Target Emissions Rate, which is consistent with national policy. This covers regulated emissions only. The approach towards carbon offsetting, in the form of either a financial contribution or a linked/near-site new renewable electricity generation provision, is not proposed to be modified. The suggested amendment is not

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MM Ref	Respondent	Summary of representations	Council response
			considered necessary to address any issues of soundness. No additional evidence has been submitted by the respondent as to why REGO-backed energy provision should be accepted.

Policy NZC3: Embodied carbon, materials and circular economy

MM Ref	Respondent	Summary of representations	Council response
MM12.8	216 Home Builders Federation	Remains concerned about the evidence and justification for policies on embodied carbon. Suggests that this issue should be addressed nationally rather than through Local Plans.	Representations noted; however, comments provided do not relate to the proposed modification, and no additional evidence relating to the soundness of the policy has been provided. Comments provided therefore do not alter the conclusion that policy NZC3 as modified is sound. The evidence justifying the policy approach is set out in the Council's Net Zero Carbon Topic Paper (TPC007).

Policy NZC4: Adaptation to a changing climate

No representations received regarding the deletion of Policy NZC4: Adaptation to a changing climate.

Policy NZC5: Renewable energy and energy efficiency

No representations received regarding the Main Modifications to Policy NZC5: Renewable energy and energy efficiency *Flood risk*

Policy FR1: Flood risk and water management

No representations received regarding the Main Modifications to Policy FR1: Flood risk and water management

Chapter 13. Design and conservation

Chapter introductory section

No representations received regarding Main Modifications to the Introductory section of Chapter 13: Design and conservation.

Policy DPM1: Delivering well-designed, inclusive places

MM Ref	Respondent	Summary of representations	Council response
MM13.3	195 Old Market Community Association	Reference should be made to 'neighbourhood development plans' alongside references to masterplans and spatial frameworks.	The representation does not relate to the approach set out in the MMs. The suggested amendment to Policy DPM1 is not considered necessary to address matters of soundness or legal compliance. Neighbourhood Development Plans attain the same legal status as a local plan (and other documents that form part of the statutory development plan) once it has been approved at a referendum. Therefore, there is no need to repeat a reference to adopted NDP policies throughout the Local Plan. The Local Plan sets out this relationship clearly at MM1.1 in the Schedule of Main Modifications (EXA064).

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

MM Ref	Respondent	Summary of representations	Council response
MM13.5	192 Hammerson, Harringay, Melburg & Olympian Homes	Reference to the Space Standards Practice Note should be deleted, in line with the Inspectors' final post-hearing advice on removing references to documents not forming part of the development plan from within the policy text.	Examination document (IN11) refers to alignment between development proposals and planning documents within Development Strategy policies and does not suggest removal of references to planning documents.

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MM Ref	Respondent	Summary of representations	Council response
			Modification MM13.5 was made to improve clarity on approach to proposals for specialist forms of accommodation.

Policy DC2: Tall buildings

MM Ref	Respondent	Summary of representations	Council response
MM13.7	148 Historic England	General support for the modifications to Policy DC2. Expressed concern around issues remaining unresolved from HE and BCC SoCG, particularly referencing publication date for a Bristol Design Guide.	Support noted.
MM13.8			In relation to Policy DC2, the Council in the SoCG considered the modifications made to the Policy to be sufficient to outline the role of Our Inherited City and Design Guide strategies. Due to the examination timeline and the need to start an immediate review of the local plan, no publication date for a Bristol Design Guide was agreed.

Policy DC3: Alterations to existing buildings

No representations received regarding the Main Modifications to Policy DC3: Alterations to existing buildings.

Policy DC4: Recycling and refuse provision in new development

No representations received regarding the Main Modifications to Policy DC4: Recycling and refuse provision in new development.

Heritage and the historic environment

Policy CHE1: Conservation and the historic environment

MM Ref	Respondent	Summary of representations	Council response
MM13.15	204 Victoria Park Action Group CIC	Supportive of the additional wording in respect of the assessment of the scale and harm of loss and significance of both designated and non-designated heritage assets. Suggested further wording be included to clarify the definition of ‘clear and convincing justification’ when considering any level of harm to designated heritage assets.	Support noted. The suggested additional modifications are not considered necessary for soundness or compliance reasons.
MM13.16	148 Historic England 195 Old Market Community Association 203 Bristol Civic Society	Referred to MM13.16 setting out the Council’s intention to review the ‘Our Inherited City’ Heritage Strategy in 2025.	The Council invite the Inspectors to consider a further modification to MM13.16, for clarity and correction (<u>bold underlined text</u> proposes the additional main modification wording): <u>The Council intends to update this strategy in 2025. The most appropriate timing will be considered as part of the new local plan process.</u>
	148 Historic England	Comments in support of modifications bringing policy into greater alignment with NPPF regarding ‘weight’ and ‘harm’, corrects outdated guidance reference, how policy applies to non-heritage assets and when heritage statement is requirement, role of Bristol’s heritage strategy and importance of Heritage at Risk Register.	Support noted.

Policy AD1: Advertisements

MM Ref	Respondent	Summary of representations	Council response
MM13.17	67 Adblock Bristol	Expressed support for the inclusion of the reference to the impacts on both visual and aural amenity, as well as support for the inclusion of other nuisances.	Support noted.
	105 Rachel Tuckett	Respondent #105 also suggested retaining the phrase ‘visual commercialisation’ for clarity.	The additional wording within MM13.17 to clarify ‘clutter’ adds greater flexibility, rather than regarding visual impacts alone. No further modifications are considered necessary for soundness or compliance reasons.
	8 Wildstone Capital Limited	Concerns were raised regarding the modified policy text; the respondent suggested that the modifications to Policy AD1 are not sound or legally compliant, and that representations at Regulation 19 stage had not been taken into account. Suggested changes to the policy text were provided.	Representation noted; however, the suggested amendments are not considered to be within the scope of the consultation as they do not relate to the main modifications. The respondent’s representation was considered at Reg.19 stage as reflected in EXA001. The Council’s response to Inspectors’ Matters 13 (BCC07) sets out how the elements outlined in AD1 are considered to be relevant, appropriate to and consistent with the NPPF. No new evidence has been presented as to suggest that further modifications are necessary for soundness or compliance reasons

Chapter 14. Health, wellbeing and food sustainability

Policy HW1: Pollution control and water quality

No representations received regarding the Main Modifications to Policy HW1: Pollution control and water quality

Policy HW2: Air quality

No representations received regarding the Main Modifications to Policy HW2: Air quality

Policy HW1A: Noise

No representations received regarding the Main Modifications to Policy HW1A: Noise

Health impacts of development

Policy HW2B: Health and development

No representations received regarding the Main Modifications to Policy HW2B: Health and development

Policy HW3: Takeaways

No representations received regarding the Main Modifications to Policy HW3: Takeaways

Food sustainability

Policy FS1: The provision of allotments

No representations received regarding the Main Modifications to Policy FS1: The provision of allotments

Policy FS3: The protection of existing food growing enterprises and allotments

No representations received regarding the Main Modifications to Policy FS3: The protection of existing food growing enterprises and allotments

Chapter 15. Utilities and minerals

Policy UM1: Telecommunications

No representations received regarding the Main Modifications to Policy UM1: Telecommunications

Policy UM2: Unstable land

MM Ref	Respondent	Summary of representations	Council response
MM15.2	97 The Coal Authority	Expressed support for the modifications to UM2, stating that the changes were sound and compliant.	Support noted.
MM15.3		Clarification made regarding the trading name of the Coal Authority.	Changes made to update the name of the Coal Authority not considered necessary. MM15.2 and MM15.3 can be amended to revert to the original name.

Policy UM3: Mineral Safeguarding Areas

No representations received regarding the Main Modifications to Policy UM3: Mineral Safeguarding Areas

Chapter 16. Development allocations

Policy DA1: Proposed development allocations

No representations received regarding the Main Modifications for Policy DA1: Development Allocations.

Appendix A: List of strategic policies

No representations received regarding the Main Modifications for Appendix A: List of strategic policies.

Appendix D: Monitoring and review

MM Ref	Respondent	Summary of representations	Council response
MMD.1	143 Alan Gallagher	Suggests monitoring should cover affordable housing, housing mix, renter security, accessibility for older and disabled people and whether residents can remain within their communities when their circumstances or income changes.	Representation noted; however, suggested amendment is not considered necessary to make the Plan sound or legally compliant. The Council will continue to monitor how well the policies in the local plan are performing through the AMR (Annual Monitoring Reports) and the monitoring framework covers delivery against policy AH1 and H4. H9, as a non-strategic policy, is not proposed for monitoring.
MMD.1	203 Bristol Civic Society	Consequential amendment to minimum density standards following respondent's earlier comments on MMs for Policies DS5/6/7.	Representation noted; however, no modifications are considered necessary for soundness or compliance reasons. Please see Council's response to respondent's comments on policies DS5/6/7.
MMD.1	216 Home Builders Federation	The Monitoring Framework as drafted is ineffective as it does not set out what actions could be taken if any issues are identified. Suggests adding an action column (examples given of actions to address housing under-delivery). Suggests that if unmet need is to be delivered outside the Plan area, then this should be monitored as well. Suggests targets for housing delivery to be set as annual and whole Plan figures.	Representation noted; however, suggested amendments are not considered necessary to make the Plan sound or legally compliant. The immediate review of the Local Plan will allow any issues identified through monitoring to be addressed. Annual housing delivery will be considered in the context of targets across the Plan period as a whole.

Development allocations annex

Multiple allocations

MM Ref	Respondent	Summary of representations	Council response
Representation made in reference to the 37 development allocations where heritage-related modifications are proposed. A full list of the sites can be viewed in Appendix 1 of the representation in the Catalogue of Full Responses.	148 Historic England	Comments in support of modifications to these site allocations as provide greater clarity regarding appropriate response to significance of heritage assets. Previous comments reiterated; lack of clear explanation for how significance of affected heritage assets has informed the principle, proposed housing numbers and form of development in this policy. A rationale of this is requested. Respondent acknowledged above point is more of principle and a degree of proportionality in plan making is necessary.	Support and comments are noted; the suggested rationale is not considered to be within the scope of this consultation as it does not relate to the proposed modification.

Allocation BDA0302 Land to the west of Ashton Gate

MM Ref	Respondent	Summary of representations	Council response
MMDA.17	169 Esteban Investments Limited	Concerns were raised that the modified text would reduce flexibility and therefore cause issues regarding the deliverability of the site. The	Representation noted; however, the representation provided does not alter the conclusion that allocation BDA0302 as

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MM Ref	Respondent	Summary of representations	Council response
		respondent referred to a live Section 73 Application for this site.	modified is sound, as the proposed modification to the allocated use allows sufficient flexibility and covers all the uses proposed by the respondent. It is noted that the respondent considers both the text of the main modifications and the proposed change included in their representation to be sound and legally compliant. It is also noted that the planning application referred to is pending consideration and as such the allocated use as modified reflects the latest planning application on the site.

Allocation BDA0304 1-25 Bedminster Down Road, Bedminster

MM Ref	Respondent	Summary of representations	Council response
MMDA.20	222 Railfuture Severnside	Supports the modification given the acknowledgement that Parson Street Station provides a sustainable and accessible location.	Support noted.

Allocation BDA0401 – Land at Gloucester Road/Merton Road, Horfield

MM Ref	Respondent	Summary of representations	Council response
MMDA.26	201 Laister Planning Limited	Respondent raised concern that estimated capacity of the allocation was not visible on Schedule and suggested to retain 100 homes capacity.	Representations are noted. The Schedule does not show the 'estimated capacity' row as it was not subject to modifications – the 100 homes capacity is not being proposed to be removed.

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MM Ref	Respondent	Summary of representations	Council response
		Further suggested amendments to the policy to include more guidance on heights and use types, include provision of HMO accommodation and include an allowance for development up to six stories in appropriate locations within the site.	Representations relating to uses and heights are noted; however, the comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.

Allocation SA610 Railway cutting, Lower Guinea Street

MM Ref	Respondent	Summary of representations	Council response
MMDA.59	181 Hugh and Judith Pratt	Objection to the proposed modification on grounds that modification is not justified, effective, or consistent with national policy. Suggest that modified text be amended to remove constraints regarding heritage, building height, workspace, and drainage systems, given the advanced stage of relevant planning applications on the site, and to reflect wording from IN9: Action Points Matters 17 and 18. <i>Please see Catalogue of Representations for full suggested wording.</i>	Representation noted, however the suggested amendments to the use allocated on this retained allocation are not considered to be within the scope of this consultation as they do not relate to the proposed modification. Comments on modifications to the development considerations do not alter the conclusion that allocation SA610 as modified is sound, as the modifications are proposed for consistency and clarification.

Allocation BDA1301 Stapleton Road Cricket Club, Park Road, Stapleton

MM Ref	Respondent	Summary of representations	Council response
MMDA.69	135 Sport England	Respondent noted that Stapleton Cricket Club are looking to relocate to a larger site, supported by GCF and ECB, with discussions/ a potential piece of land identified.	Representations are noted.

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Allocation BSA1108A Previously developed land at Novers Lane, east of Hartcliffe Way and west of Novers Lane

MM Ref	Respondent	Summary of representations	Council response
MMDA.79	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Opposes modifications to the development considerations. Suggests restoring the requirement to provide a children's playground. Suggests restoring the reference to the need to carry out a Health Impact Assessment in line with the requirements of Policy HW2B.	Representation noted, however, main modifications are a correction in order to properly reflect the local plan's intentions for the site given the significant reduction to the size of the site. The requirement for a children's playground was based on the existing allocation of a far larger site and is not justified on the retained smaller site. References to Health Impact Assessment have been removed for consistency and to complement the main modifications to Policy HW2B: Health and development.

Allocation BSA1109 Land adjoining Hartcliffe Way and Hengrove Way, Inn's Court

MM Ref	Respondent	Summary of representations	Council response
MMDA.81	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Opposes the change to the development considerations. Suggests that the deleted reference to considering links with adjacent site BSA1116 should be replaced with the requirement to 'integrate appropriate measures to ensure that green infrastructure links to the areas inside of Inns Court are maintained', in line with considerations used on other sites.	Representation refers to the Main Modifications which reflect the deletion of the development consideration relating to links with the adjacent site allocation. Representation provided does not alter the conclusion that, due to identified soundness issues of clarity, development consideration relating links to BSA1116 is not required.

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MM Ref	Respondent	Summary of representations	Council response
		Suggests revising the estimated site capacity downwards to reflect the objective outlined in the Knowle West Regeneration Framework for development of 3-4 storey buildings.	Representations relating to green infrastructure and capacity are noted; however, the comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification. The change in capacity reflects the reduced size of the site as modified. As such they do not relate to the proposed modification.
MMDA.82	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Supports the revised site boundary.	Support noted.

Allocation BSA1115 Former Florence Brown School, West of Leinster Avenue

MM Ref	Respondent	Summary of representations	Council response
MMDA.83	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Supports removal of site allocation.	Support noted.

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Allocation BSA1116 Open spaces either side of Inn's Court

MM Ref	Respondent	Summary of representations	Council response
MMDA.84	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Opposes the change to the development considerations. Suggests that the deleted reference to considering links with adjacent site BSA1116 should be replaced with the requirement to 'integrate appropriate measures to ensure that green infrastructure links to the areas inside of Inns Court are maintained', in line with considerations used on other sites. Changes would enable consideration of physical links for people and wildlife.	Representations relating to green infrastructure are noted; however, the comments are not considered to be within the scope of this consultation as they do not relate to the proposed modification.

Allocation BSA1118 Broad Plain House and associated land, Broadbury Road

MM Ref	Respondent	Summary of representations	Council response
MMDA.85	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Supports removal of site allocation.	Support noted.

Allocation BSA1120 4-16 Filwood Broadway

MM Ref	Respondent	Summary of representations	Council response
MMDA.86	186 Knowle West Regeneration	Supports the change of address to match description of extant planning application.	Support noted.

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MM Ref	Respondent	Summary of representations	Council response
	Residents Planning Group and Knowle West FUTURE		
MMDA.87	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Opposes the reduction of the site area to 0.1 hectares as this does not match the description in the extant planning permission (0.15 hectares) and is therefore not effective.	Modified site area reflects the most recent planning permission granted.
MMDA.88	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Opposes the changes to the supporting text. Suggests that deleted wording regarding commercial floorspace be replaced with the relevant site description from the extant planning permission. Suggests that references to 'future' neighbours' amenity be removed given that it is not clear where future properties could be constructed.	Representation comments are noted, however, the suggested amendment to the development consideration relating to commercial floorspace is not considered necessary to make the policy sound or legally compliant. The development consideration requiring development 'be designed to safeguard the amenity of future residential properties; is required for consistency and clarification to ensure the development considerations are justified and effective, as the site allows for residential development on the site and as such the development consideration as modified safeguards the amenity of these potential future residents.

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MM Ref	Respondent	Summary of representations	Council response
MMDA.89	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Opposes the modified site boundary as it is not consistent with the extant planning permission.	Representation comments are noted; however, the modified site boundary reflects the most recent planning permission granted.

Allocation BSA1122 Sports court and former swimming pool site on the north-east corner of Filwood Broadway and Creswicke Road Junction

MM Ref	Respondent	Summary of representations	Council response
MMDA.90	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Opposes the change to the development considerations. Suggests reverting to the original wording of 'provide' rather than 'encourage' active ground floor uses. A lack of active provision would look out of place and could attract anti-social behaviour.	Representation noted, however, the representation provided does not alter the conclusion that the development consideration as modified is sound as it is required for consistency and clarification to ensure the site allocation development consideration is justified and effective.

Allocation BDA1702 14 Wyke Beck Road, Brentry

MM Ref	Respondent	Summary of representations	Council response
MMDA.97	143 Alan Gallagher	Response referenced MMDA.97. Expressed general support for the allocation; comments did not refer to MMDA.97.	Support noted.

Schedule of modifications to the policies map (EXA065)

Reference	Policy	Respondent	Comments	Council response
N/A	All sections	204 Victoria Park Action Group	Suggests mapping significant viewpoints to reflect the need for development to consider these.	Representation noted; however, the role of the Policies Map is to illustrate where the policies in the Local Plan apply. The suggested amendment is not considered to be within the scope of this consultation as it does not relate to a proposed modification.
PM.1	DS1: Bristol City Centre	202 University of Bristol	Supports the inclusion of the Woodland Road campus.	Support noted.
N/A	H7: Managing the development of purpose-built student accommodation	202 University of Bristol	Other UoB campuses (Clifton and Stoke Bishop) are not shown despite being referenced in other emerging policies, i.e. Policy H7. As per previous representations, suggests adding in other two campuses for clarity.	The Council invite the Inspectors to consider a further modification for consistency and to effectively express where the policy applies. <u>The Inspectors are invited to consider whether for consistency the policies map for Policy H7 should be modified to include the Stoke Bishop and Clifton campuses.</u>
PM.3	GI1	143 Alan Gallagher	Comments in support of modifications to update Policies Map. No objection to PM.3 with proviso that	Support noted.

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Reference	Policy	Respondent	Comments	Council response
			level of protection for open space is not weakened and remains clear.	
PM.3	GI1	42 Matthew Garcia 43 Yhonet Garcia 56 Hannah Klewin 163 Friends of Badock's Wood 170 Bristol Parks Forum 204 Victoria Park Action Group CIC 179 Northern Slopes Initiative Group 186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Objection to removal of LGS sites following deletion of Policy GI1. Comments were made in reference to sites LGS14001, LGS14002, and LGS14003. Respondent #186 suggested an immediate review of all ROGS sites previously designated as LGS.	PM.3 is a consequential modification to the Policies Map which reflects changes set out in document EXA064. Please see Council responses to comments on MM9.13 and EXA061.
PM.3	GI1	28 Stride Brothers Ltd	Suggests alteration of site boundary (previously designated as LGS17004) to remove fields under respondent's ownership due to erroneous classification of site under LGS and ROGS assessment.	Following examination, it was concluded that the methodology for identifying Local Green Space (LGS) was not soundly based, and as such, it could not be concluded with any certainty that individual designations met the national criteria for the 'Local Green Space' designations.

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Reference	Policy	Respondent	Comments	Council response
				Furthermore, it was noted that many of the sites identified as LGS already benefit from other planning protections because of their heritage and/or biodiversity value. As a result, Policy GI1 'Local Green Space' and the LGS designations are proposed to be deleted. The site was subsequently assessed under the ROGS criteria and proposed for designation as ROGS as a main modification (assessment can be found at EXA061 BCC Examination Note: Protected Open Space). The representation is noted, however, the representation provided does not alter the conclusion that the designation as modified is sound as it meets the ROGS criteria.
PM.3	GI2	42 Matthew Morris	Raises concern about unmapped Incidental Open Spaces.	Representations are noted; however, Incidental Open Spaces have not been shown on the Policies Map at any stage of Local Plan preparation. These comments therefore are not considered to be within the scope of this consultation as they do not relate to the proposed modifications.

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Reference	Policy	Respondent	Comments	Council response
PM.4, PM.6-PM.9	GI2, BG2	43 Yhonet Garcia	Objection to modifications which alter or reduce protections to green spaces and Sites of Nature Conservation Interest. Suggests retention of existing protections.	Modifications to open space or Sites of Nature Conservation Interest boundaries have been made to reflect permissions granted or development in progress, and therefore to accurately reflect the changing nature of the area. Protections remain in place for the sites as shown on the Policies Map.
PM.5	GI2: Protected Open Space Filwood Park	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Supports the inclusion of Filwood Park as a ROGS. However, the designation as mapped does not fully cover the green space. The extension suggested is connected to the area already proposed to be designated, is of public value, and is accessible to the public. <i>Please see PDF submission in Catalogue of Representations for a map of the suggested addition.</i>	Support noted. Filwood Park was proposed for designation as a LGS following the respondent's Reg. 19 representation (EXA001). The boundary drawn at the time reflected the Council's intentions for the site in relation to LGS and was considered to cover the relevant park area. This boundary formed the evidence used to assess the site as ROGS under the Main Modification to Policy GI2 (EXA061). It is therefore not considered reasonable at this stage in the examination to reconsider the site boundary and expand the designation further than that already assessed, and is not required for reasons of soundness or legal compliance.

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Reference	Policy	Respondent	Comments	Council response
				The Council notes the proposed site boundary submitted by the representor at this stage. This new evidence will be taken into consideration as part of a future review of the local plan.
PM.8	BG2: Sites of Nature Conservation Interest Novers Common (land at Sidford Road)	52 David Campell	General comments made on poor visualisation of modifications. Respondent sought clarification on extent of modifications relating to Novers Common.	Representation noted. The Policies Map will be made available in an interactive online format following the adoption of the local plan for improved visualisation.
PM.8	BG2: Sites of Nature Conservation Interest Novers Common (land at Sidford Road)	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Supports the removal of the relevant area of the SNCI. Removal reduces potential discrepancy.	Support noted.
PM.9	BG2: Sites of Nature Conservation Interest Site west of Concord Drive	143 Alan Gallagher	Suggests that boundary amendments should not result in avoidable loss of nature conservation value, green infrastructure or local environmental quality, and are clearly justified.	Representation noted. Reasons for each boundary modification are set out in EXA065.

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Reference	Policy	Respondent	Comments	Council response
PM.13	DA1: Development allocations Site BDA0302	169 Esteban Investments Limited	Welcomes the modification to the red line boundary to include the car park, and the consequent change to the site area. Change is considered sound and legally compliant.	Support noted.
PM.18	DA1: Development allocations Site BSA1109	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Supports the revised site boundary.	Support noted.
PM.19	DA1: Development allocations Site BSA1115	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Supports removal of site allocation.	Support noted.
PM.20	DA1: Development allocations Site BSA1118	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Supports removal of site allocation.	Support noted.
PM.21	DA1: Development allocations Site BSA1120	186 Knowle West Regeneration Residents Planning Group and Knowle West FUTURE	Objection to the modified site boundary as it is not consistent with extant planning permission 22/03536/FB.	Site boundary is consistent with approved site location plans for the planning permission.

Supporting documents

EXA066 - Sustainability Appraisal Addendum

Respondent	Summary of comments	Council response
46 Andrew Chappell	Document provides useful clarification. However, evidence presented does not clearly justify the removal or downgrading of LGS or protected open space. There is an under-recognition of the cumulative value of smaller green spaces. The SA update should more explicitly recognise the role of LGS in delivering biodiversity enhancement, climate resilience, and accessible natural space for communities.	Concerns are noted, however the suggested amendment to EXA066 is not considered necessary for soundness or legal compliance reasons. The submission SA (CDS004) assessed the performance of GI1 (LGS) and GI2 against the SA Framework Objectives, found in Table 14 of that document. Existing SA objectives 11, 12 and 15-18 align with the comments raised on biodiversity enhancement, climate resilience, and accessible natural space for communities. However, it is beyond the remit of the SA Addendum (EXA066) to reassess the performance of Policy GI1 found in the Submission version of the SA (CDS004) in the way that the representation suggests. The purpose of the SA Addendum is to identify whether Main Modifications could lead to significant effects against the SA framework. Given the submission SA's findings that GI1 and GI2 performed similarly positively against the SA objectives identified above (with certainty of effect being the only difference), the modification to remove GI1 is appropriately considered for SA purposes.

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Respondent	Summary of comments	Council response
193 Frank Bruce and Company Limited	The SA document fails to consider the practical impacts of the addition of a specific quantum for Industry and Distribution for DS6. No evidence is presented that the place-making aspirations have been assessed against the 40,000 sqm requirement. The modifications materially impact the previous policy assumptions when considering deliverability.	The reference to around 40,000m ² of industry and distribution premises within the policy wording is not considered to change the aim or focus of the policy and therefore, does not require detailed reappraisal. The figure was informed by analysis of the development potential for new employment floorspace and by issues including existing employment land provision and the Urban Potential Study. The policy enables a flexible approach to delivery in the regeneration area and will operate alongside a regeneration framework which will provide further guidance to support delivery.
202 University of Bristol	The proposed Main Modifications are considered to assist in achieving the stated Objectives of the Sustainability Appraisal following the removal of bedspace caps. However, the representor still contends that the policy as a whole risks undermining the Objectives due to the elements that would restrict supply and impact the viability of PBSA developments, increasing the risk of harmful outcomes.	The Sustainability Appraisal Addendum has considered the impact of the proposed modifications to H7 on the overall aim of the Local Plan. It is noted that the respondent considers that the modifications assist in achieving the objectives. The concerns raised repeat the representations made at Reg 19 and to Matter 1 which have already been considered through the examination process, on the basis that previously raised concerns have not been incorporated as modifications.

EXA067 - Habitats Regulation Assessment Addendum

Respondent	Summary of comments	Council response
46 Andrew Chappell	Document provides useful clarification. However, evidence presented does not clearly	Suggested amendment to EXA067 is not considered necessary for legal compliance.

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Respondent	Summary of comments	Council response
	justify the removal or downgrading of LGS or protected open space. There is an under-recognition of the cumulative value of smaller green spaces. The HRA update should more explicitly recognise the role of LGS in delivering biodiversity enhancement, climate resilience, and accessible natural space for communities.	The HRA regulations are specific to the protection of European Designated Sites. The published iterations of the HRA did not identify Policy GI1 or GI2 as specifically providing embedded mitigation for the effects of the Local Plan. However, any site affected by MM 9.13, or MM 9.15-17 which plays a role in providing functionally linked land would be identified at project level accordingly.
218 Natural England	Natural England reiterated that the modifications (other than specific to MM3.11 - Policy DS4) have not altered the advice previously given regarding the Habitats Regulation Assessment.	Support noted. Previous advice taken to refer to the support for the substantive findings as stated in Natural England's Participant statement to Matter 1 (PS1-487). (Specific comments on Policy DS4 are addressed in MM3.11 of this document.)

EXA045 BCC Examination Note - 5 Year Housing Land Supply

Respondent	Summary of comments	Council response
143 Alan Gallagher	Respondent supports an ambitious approach to housing delivery but expressed concerns that success should be measured by the provision of genuinely affordable and secure homes, not just housing numbers alone.	Suggested amendment to EXA067 is not considered necessary for soundness or compliance reasons. The comments refer to monitoring matters and are addressed under representations made to Appendix D.

EXA046 BCC Examination Note - Surface Water Flood Risk

No comments received in respect of EXA046 BCC Examination Note – Surface Water Flood Risk.

EXA052 BCC Examination Note – Gypsies, Travellers, Travelling Showpeople and Houseboat Dwellers

No comments received in respect of EXA052 BCC Examination Note – Gypsies, Travellers, Travelling Showpeople and Houseboat Dwellers.

EXA053 BCC Examination Note – Hallen Marsh Policy E4

No comments received in respect of EXA053 BCC Examination Note – Hallen Marsh Policy E4.

EXA054 BCC Examination Note - Policy H7 PBSA Information

Respondent	Summary of comments	Council response
143 Alan Gallagher	Supports the management of Purpose Built Student Accommodation and highlights the importance of ensuring that housing provision and focus on the delivery of affordable, secure and suitable homes for permanent residents and families, will not be distorted by the delivery of PBSA.	Comments noted. The comments refer to monitoring matters and are addressed under representations made to Appendix D.

EXA060 BCC Examination Note - Employment Land Requirements

Respondent	Summary of comments	Council response
143 Alan Gallagher	Welcomed the clarification of the employment floorspace requirements and supply. Highlighted the importance of considering not only	Support noted. EXA060 responds to specific employment land requirement matters raised during

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Respondent	Summary of comments	Council response
	floorspace targets, but also whether the location of employment floorspace is accessible, i.e., can residents can access jobs, education and training by public transport, and whether local centres can contribute to local opportunities for employment floorspace.	examination. Suggested considerations are noted but are outside the scope of the examination note.

EXA061 BCC Examination Note - Protected Open Space

Respondent	Summary of comments	Council response
9 We Love Stoke Lodge 10 Sue Wiles 11 Edna McMahon 12 Kathryn McMahon 13 Harry McMahon 14 Jonathan Mark Milne Johnson 15 Della Hooper 18 Helen Sachdev 19 Fiona Evans 20 Nick Drewe 21 Gill Cleverdon 22 John Pearce 23 Phillipa Nason 24 Helen Powell 25 Ewen MacLeod 32 Yvan Costes	The assessment of Stoke Lodge as only meeting the criteria for 'Health and Recreation' is incorrect, unjustified and inconsistent with the assessment criteria set out in MM9.17; Stoke Lodge meets other criteria beyond that of 'Health and Recreation'. Stoke Lodge should be reassessed and greater protections afforded to it.	Stoke Lodge has been assessed in a manner consistent with the assessment of all other Local Green Spaces. Stoke Lodge is not within a registered Wildlife Corridor, SNCI, SSSI nor is it designated as a Local Historic Park and Garden. It has limited visibility from the surrounding roads and is not considered to make an open space contribution to the character of the area. Nevertheless, Stoke Lodge does have an important health and recreational value. As such it is proposed to be designated a Reserved Open Green Space.

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Respondent	Summary of comments	Council response
69 Felicity Pine 66 Christopher Law 86 Chris and Jane Thomas 95 N Holford 90 Gabrielle Huggins 103 Councillors John Goulandris and Henry Michallat 114 Guy Nason 115 Martin Farrell 124 Neil Phillips 125 Ken Pattison 126 John Hollyman 127 Carolyn Jenkins 131 Peter Wright 132 Susan Mayer 133 Tanya Joy 134 Sue Geary 137 Lottie Woodall 138 Shirley Brown 139 Julie Wright 140 Graham Wright 151 Kevin Baker 152 Alison Yeoman 156 Judith Brant 157 John Diwell		

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Respondent	Summary of comments	Council response
161 John Moore 162 Roger James 165 Geoff Causton 168 Peter Hobbs 173 Janie Van Hool 174 Helen Boyd 176 Alexandra Macara 178 Ms O W Batley 180 Alison David 182 Kathy Welham 187 Sheila Holmes 190 Joanna Williams 191 Russell Wickens 199 Sarah Greet 200 Peter Weeks 207 Chris Woodford 208 Susan Tranter 221 Alison Cheblik 189 Simon Worthington		

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Respondent	Summary of comments	Council response
9 We Love Stoke Lodge 10 Sue Wiles 11 Edna McMahon 12 Kathryn McMahon 13 Harry McMahon 14 Jonathan Mark Milne Johnson 20 Nick Drewe 21 Gill Cleverdon 22 John Pearce 25 Ewen Macleod 66 Christopher Law 69 Felicity Pine 86 Chris and Jane Thomas 95 N Holford 134 Sue Geary 138 Shirley Brown 173 Janie Van Hool 189 Simon Worthington 200 Peter Weeks 207 Chris Woodford	Concerns for the implications of this assessment, namely that lesser protections will be afforded to Stoke Lodge, resulting in development of the site.	All areas identified as Reserved Open Green Space are subject to the planning considerations set out in Policy GI2: Protected Open Space, regardless of how many of the identification criteria apply. While some areas may benefit from other designations, such as being an SNCI, they are not subject to enhanced planning controls by virtue of them meeting more of the identification criteria used to designate Reserved Open Green Space. As such, Stoke Lodge benefits from the planning controls set out in Policy GI2: Protected Open Space to the same degree as all other areas designated as Reserved Open Green Space.
9 We Love Stoke Lodge 10 Sue Wiles 11 Edna McMahon 12 Kathryn McMahon 13 Harry McMahon	Mention of the recent High Court case determining only that the land should not be registered as a Village Green, with the judge warning against any party trying to misrepresent it. Mention of planning inspectorate's	Stoke Lodge has been assessed in a manner consistent with the assessment of all other Local Green Spaces. Cotham School's lease has not been a consideration within this assessment.

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Respondent	Summary of comments	Council response
14 Jonathan Mark Milne Johnson, 15 Della Hooper 20 Nick Drewe 21 Gill Cleverdon 22 John Pearce 25 Ewen MacLeod 86 Chris and Jane Thomas 95 N Holford 115 Martin Farrell 139 Julie Wright 156 Judith Brant 157 John Diwell 162 Roger James 174 Helen Boyd 191 Russell Wickens 199 Sarah Greet 207 Chris Woodford 189 Simon Worthington	consideration that Cotham School's lease should is not relevant.	
15 Della Hooper 18 Helen Sachdev 19 Fiona Evans 66 Christopher Law 168 Peter Hobbs 174 Helen Boyd 208 Susan Tranter	Concerns regarding Stoke Lodge. Specifically that the local plan has not separated issues of the school's use of the land and fencing from the planning designation as advised by the Planning Inspectorate.	The decision was made at Economy and Skills Policy Committee that it would not be expedient to pursue the creation of an Article 4 direction for Stoke Lodge playing field to remove permitted development rights for the erection, improvement or alteration of a gate, fence, wall or other means of enclosure. This is separate to and has no bearing on the assessment of

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Respondent	Summary of comments	Council response
189 Simon Worthington		Stoke Lodge as a ROGS, which has been carried out consistently across all ROGSs.
28 Stride Brothers Ltd	Objects to the application of ROGS criteria to site previously designated as LGS17004.	Following examination, it was concluded that the methodology for identifying Local Green Space (LGS) was not soundly based, and as such, it could not be concluded with any certainty that individual designations met the national criteria for the 'Local Green Space' designations. Furthermore, it was noted that many of the sites identified as LGS already benefit from other planning protections because of their heritage and/or biodiversity value. As a result, Policy GI1 'Local Green Space' and the LGS designations are proposed to be deleted. The site was subsequently assessed under the ROGS criteria and proposed for designation as ROGS as a main modification (assessment can be found at EXA061 BCC Examination Note: Protected Open Space). The representation is noted, however, the representation provided does not alter the conclusion that the designation as modified is sound as it meets the ROGS criteria.
170 Bristol Parks Forum	Concern regarding how Reserved Open Space designations are measured against the criteria. There are sites which met LGS criteria not indicated as meeting all of the ROGS criteria.	The identification of land as LGS (Local Green Space and Reserved Open Green Space - Topic Paper) did not require all of the criteria to be met. Therefore it is probable that the subsequent assessment of this land against ROGS criteria (Bristol City Council

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Respondent	Summary of comments	Council response
		Examination note – Protected Open Space may also not meet all the criteria. It should be noted that all areas identified as Reserved Open Green Space are subject to the planning considerations set out in Policy GI2: Protected Open Space, regardless of how many of the identification criteria apply.

EXA062 BCC Examination Note - Employment Land Update

Respondent	Summary of comments	Council response
143 Alan Gallagher	Welcomed the clarification of the employment floorspace requirements and supply. Highlighted the importance of considering not only floorspace targets, but also whether the location of employment floorspace is accessible, i.e., can residents can access jobs, education and training by public transport, and whether local centres can contribute to local opportunities for employment floorspace.	Support noted. No further amendments are considered necessary for soundness or compliance reasons.

Annex

Representations on the Plan as a whole

The following comments received related to concerns regarding the Local Plan as a whole. As they do not relate to any proposed Main Modifications, they are considered out of scope of the consultation. No amendments are considered necessary in response to these for soundness or legal compliance reasons.

Respondent	Summary of comments	Council response (where relevant)
3 David Barton	Suggests that all stages of planning policy preparation should be informed by the respondent's proposals regarding Traditional Architecture design codes and guidance.	
216 Home Builders Federation	Requests that the Council consider the scope of the Plan in the context of the new NPPF proposals, especially where the Plan seeks to go further and faster than national policy. Suggests that the Local Plan will require further modifications to reflect the latest updates to national policy on BNG. Notes that as SPDs can no longer be adopted after June 2026, the Plan as a whole should be reviewed to ensure that references to adopted SPDs are clear.	In December 2025 the government announced changes to planning including a new NPPF. However, the transitional arrangements as set out in Paragraphs 234 and 235 explain that the Examination continues under the relevant previous version of the Framework for plans submitted for examination prior to 12 March 2025. Therefore, whilst presenting its own challenges upon adoption of the plan, updating the plan to align with a new framework would be contrary to national policy. However, in line with the transition provisions the Council has also launched an immediate review of the local plan which is intended to address these points.
223 Stephen Paradise	Supports the adoption of an up-to-date local plan; however, this must be genuinely effective in delivering small-site, brownfield and urban infill housing. Asks that the final wording of the Plan gives clear support to small-site urban housing, and that substantial weight is given to sustainable infill schemes.	

Representations regarding Open Space

The following respondents expressed general support for Open Space protections outside the scope of the consultation:

60 Lee Miller, 64 Treve Jenkyn, 44 Hayley Ash, 46 Andrew Chappel, 47 Janice Fudge, 50 Sue Cullimore, 54 Tom Oswald, 73 John Fuller, 74 Carla Brown, 77 Colin Carey, 78 Jamie Hodge, 81 Samuel Rowe, 91 Cerise Reed, 93 Melanie Ruth, 99 Dee Jarlett, 100 E Bar, 101 Deborah Hurst, 107 Rachel Hall, 109 David Owens, 113 Jacqui Furneaux, 120 Kate Taylor, 121 Mark Usher, 136 Antony Muir, 153 Ken Wilkinson, 158 Lynn Nelson, 197 Kate Berry