

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

This report sets out a brief summary of what the Council considers to be the main issues arising from the consultation on the proposed Main Modifications. This report is to be read in conjunction with both the 'Bristol Local Plan Main Modifications: Catalogue of Representations Received (July 2026)', which sets out all the submitted responses in full, and the 'Bristol Local Plan Main Modifications Consultation: Report of Representations (July 2026)'.

In total, 196 respondents submitted representations to the consultation. Representations were made across all chapters of the Local Plan (except Chapter 14: Health, wellbeing and food sustainability); on the Policies Map; on the Sustainability Appraisal and Habitats Regulation Assessment; and on several of the additional examination documents published for comment.

All of the comments have been noted and duly considered, with the Council's responses to representations received set out in the Report of Representations. The majority of the issues raised in response to the Main Modifications consultation have been made previously and were considered during the examination. Where issues have been raised before, this is referred to in the Council's responses to the representations.

Where comments to the Main Modifications consultation were made but refer to unmodified elements of the text, these are noted and responded to, but the Council has indicated that these may be outside of the scope of the consultation.

Statutory consultee and consultation bodies representations

The representations received from statutory consultees have been summarised below:

Natural England

- Expressed support for MM3.11 which modifies Policy DS4: Western Harbour.
- Confirmed that advice regarding the HRA remains unchanged (in support of the plan).

Historic England

- Various comments made regarding the consideration of the significance of heritage assets in development strategy areas and site allocations across the Plan as a whole, mainly in support of the proposed modifications.
- Highlighted their expectation regarding further design guidance in MM13.16 and 13.17.

- Expressed support for where modifications have been made to clarify the weight to be given to heritage assets.

Sport England

- Suggested modifying MM9.12 to include references to the Playing Pitch Strategy; the Council has invited the Inspectors to consider a further Main Modification to reflect the Council's recent (July 2026) adoption of the Playing Pitch Strategy.

The following consultation bodies expressed support for modifications made:

- The Coal Authority (MM15.8)
- Theatres Trust (MM8.5)
- National Highways (MM10.4)

Main issues raised on the Schedule of Main Modifications to the Local Plan (EXA064)

The summaries of main issues are arranged by Local Plan chapter.

Development Strategy

The Council does not consider that any main issues arose from responses to these policies.

Historic England made representations across multiple DS policies, expressing support for Main Modifications that provide a greater emphasis on responding to heritage assets. HE also expressed concerns that no evidence has been provided to show how the significance of heritage assets was considered.

The NHS Integrated Care Board (BNSSG) suggested that amendments should be made across the DS policies to make explicit reference to healthcare infrastructure.

Multiple representations were made on the relationship between DS areas and the following policies: IDC1; UL1 and UL2; and H7.

Infrastructure, developer contributions and social value

The Council does not consider that any main issues arose from responses to these policies.

Urban living: making the best use of the city's land

The Council does not consider that any main issues arose from responses to these policies.

Housing

Policy H1: Delivery of New Homes

The modification to increase the housing requirement was supported by industry representatives.

Concerns were raised that the plan was unclear on how the additional capacity figure identified would be delivered.

The unmet need figure defined by the modification was challenged with comments made that this should be defined by the previous standard method calculation in place in 2023.

Policy AH1: Affordable housing

Multiple representations were received relating to the following changes proposed by MM6.5 and MM6.6:

- The affordable housing contribution expected for sites released from the Green Belt was unclear.
- Routes to increase shortfalls against policy requirements.

Council response

The Council does not consider that further modifications to the policy text on Green Belt release sites are necessary for soundness or legal compliance reasons.

Following a representation received on routes to increase affordable housing provision, the Council has identified a subsection of the policy text on Viability assessments that requires correction for clarity and has proposed to the Inspectors a further Main Modification to distinguish between routes of increasing market viability.

Policy H7: PBSA

Several respondents commented on proposed changes to MM6.13 and MM6.14:

- The removal of student bedspace caps (*support and objections*);
- Setting out the affordable student housing requirement in the policy text;
- Clarifying how proposals should demonstrably meet the needs of higher education providers;
- That the policy may limit growth in the PBSA sector through local imbalance requirements.

Council response

The Council does not consider any further modifications to the student bedspace caps or affordable housing requirement necessary for soundness or legal compliance reasons. Both issues were extensively considered at examination, and no new evidence that would require the Council to reconsider these issues were submitted by respondents.

The Council has considered the representations received regarding the role of ‘nominations agreements’ in evidencing the need for student accommodation. The policy modification as proposed does not set out alternative ways beyond a nominations agreement of demonstrating that a proposal meets the needs of and is supported by a higher education provider. The Council has invited the Inspectors to consider an amendment to the modification setting out an alternative means of demonstrating this.

Economy and inclusive growth

The Council does not consider that any main issues arose from responses to these policies. Comments were made regarding the removal of Policy E6 (‘Affordable Workspace’), both in support and objection.

Centres, shopping and the evening economy

The Council does not consider that any main issues arose from responses to these policies. However, as a matter of clarity, an amendment to the modification is proposed to 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.

Biodiversity and green Infrastructure

Deleted Policies GI1 and GI3; Policy GI2: Protected open space; EXA061: Protected Open Space; the Policies Map and the SA

A significant number of representations were received regarding these policies and documents relating to these.

The recurring issues were:

- The deletion of policy GI1, resulting in the removal of all Local Green Space (LGS) designations and concern over weakened green space protections;
- The reassessment of sites previously designated as LGS as Reserved Open Green Space (ROGS) not having been done consistently or disagreeing with the assessment in relation to specific sites (*support and objection*).

Council response

The approach to Open Space protections was addressed extensively at examination, and the Main Modifications proposed to ensure that all sites previously identified as Local Green Space could be designated as Reserved Open Green Space. This assessment is reflected in EXA061 and the Sustainability Appraisal. The Council will take into account comments made at this stage in the upcoming review of the Local Plan.

Transport

The Council does not consider that any main issues arose from responses to these policies. The majority of comments were supportive of the modifications including those made by National Highways. A modification to replace references to the 'Transport SPD', in the Policy Text and paragraphs 10.38 and 10.39 of the explanatory text, with 'The Council's transport guidance documents' is proposed.

Community Facilities

The Council does not consider that any main issues arose from responses to these policies. The NHS Integrated Care Board (BNSSG) raised comments that indicated both support for the delivery of community facility spaces, but were concerned that the policy was not practical for the NHS's purposes, and expressed concern that the policy modification which protects against the loss of community facilities would cause additional challenge to the disposal of NHS property.

Net Zero

The Council does not consider that any main issues arose from responses to these policies. The cumulative impact of policy requirements on viability was raised, however the Council considers that these comments have been suitably considered during the examination and the policies in the context of the plan as a whole are sound.

Design and Conservation

The Council does not consider that any main issues arose from responses to these policies. Historic England expressed concern that supporting Design Guide material was not clearly established.

Health and Wellbeing and food sustainability

No comments were made in relation to these policies.

Utilities and minerals

The Council does not consider that any main issues arose from responses to these policies.

Development Allocations

The Council does not consider that any main issues arose from responses to these allocations.

Historic England made representations referring to the consideration of the significance of heritage assets for multiple allocations (*support and objections*), though noting that these representations reflect previously made comments rather than reflecting the relative merit of each individual assessment.

Main issues raised on the Schedule of Main Modifications to the Local Plan Policies Map (EXA065)

The majority of comments related to the removal of Policy GI1 from the policies map (a consequential amendment to MM9.13). Other comments sought alterations to specific site boundaries to either increase or decrease the land included in sites affected by a Policy GI2 ROGS designation.

An alteration to the Policies Map in respect of H7 was sought in order to show all campus locations to which the policy applies.

Council response

The Council does not consider that further amendments to the Policies Map with regard to specific sites affected by GI2 to be appropriate at this stage in plan making.

The Council has proposed a further modification to the Policies map in respect of H7 to show all relevant University campus locations.

Main issues raised on the Sustainability Appraisal Addendum (EXA066)

The Council does not consider that any main issues arose from comments made on this document. Comments on the SA Addendum were made in the context of the deletion of Policy GI1; Policy DS6; and Policy H7.

Main issues raised on the Habitats Regulations Assessment Addendum (EXA067)

The Council does not consider that any main issues arose from comments made on this document. Natural England expressed general support for the HRA addendum and noted their comments specific to the assessment for Policy DS4 have been addressed.

Further modifications

Overall, the Council does not believe that any issues have arisen as a result of the Consultation that would prevent the Plan from proceeding to Adoption as proposed.

There are a number of points raised where the Council considers further clarification to the modification would be beneficial to the soundness of the plan. In the majority of cases this is to provide clarification to ensure the effectiveness of the policy.

All further Modifications that the Council have proposed have been set out in **bold underlined text** in the 'Bristol Local Plan Main Modifications Consultation: Report of Representations (July 2026)'. The Inspectors are invited to consider whether these changes can now be made to improve the effectiveness of the plan. Should the Inspectors disagree and consider that these changes cannot be made at this stage, the

Council considers that these matters and others raised during the consultation can then be revisited as part of the review of the local plan under the new local plan system.

MM Ref	Policy	Respondent	Modification
MM6.5	AH1	184 Sovereign Network Group	(Viability assessments) ...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: • The Council will encourage developers to make use of mechanisms to increase market viability (identified below) to improve any shortfall against the percentage requirement • The Council will agree to secure the viable level identified; • Agreement to viability testing at a later stage should market conditions improve may be required through a planning obligation, and The Council will encourage developers to improve any shortfall against the percentage requirement through use of public subsidy. (‘mechanisms’ identified below). ...
MM6.12	H6	16 Andrew Waller	The Council considers that a local imbalance is likely to arise where: • up to three existing residential properties are sandwiched between two HMOs, (or by other sandwiching variations as defined by the Council’s ‘Managing the development of houses in multiple occupation’ SPD or successor document) unless the effects are reduced by separation of properties due to intervening spaces or properties being detached;
MM6.13	H7	177 Watkin Jones Group 192 Hammerson, Harringay, Melburg &	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.</u> All larger scale development (250 bed spaces or more) should have the support of the relevant

MM Ref	Policy	Respondent	Modification
		Olympian Homes 202 University of Bristol 211 Fusion Group 217 Smart Urban Living Bristol (One) Limited 219 Unite Group PLC	<u>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> 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
MM8.4	SSE2	160 The Westbury on Trym Society	(Paragraph 8.13B) <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.</u> If these rights are restricted by any future Article 4 direction, the policy approach set out in the Local Plan resists <u>the loss of these uses in centres in cases where planning permission is required.'</u>
MM10.6 and 10.7	T4A	203 Bristol Civic Society	To amend references throughout the policy and explanatory text to replace the 'Transport SPD' with ' The Council's transport guidance documents '.
MM13.16	CHE1	148 Historic England 195 Old Market Community Association 203 Bristol Civic Society	The Council intends to update this strategy in 2025. The most appropriate timing will be considered as part of the new local plan process.