



Bristol Local Plan Review consultation March 2019

Summary of consultation responses

Published September 2019

Introduction to this summary

Overview

Public Consultation on the Local Plan Review took place between 18 March 2019 and the 24 May 2019. As part of the requirements within Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the consultation sought open comments on the content of the Local Plan and what it ought to contain. Representations received will be taken into account by Bristol City Council and will be used to inform the next draft of the Local Plan (Publication Draft Regulation 19).

Consultation Responses

A total of 922 responses were received to the content of the Local Plan Review.

Appendix D lists all the respondents in alphabetical order and each respondent is given a reference number.

The tables below summarise the comments made by each respondent, against each draft policy – listing the respondent reference number in the right-hand column; one respondent may have made multiple comments. The number of comments raised against each policy or each part of a policy, and whether these support or object to the policy wording has been indicated.

Structure of the Document

The document has been prepared to mirror the structure of the Local Plan Review. The main document covers the policies within the Draft Policies and Development Allocation Consultation (March 2019), with appendices covering other documents subject to consultation as follows:

- Appendix A: Bristol Local Plan Review Draft Site Allocations;
- Appendix B: Bristol Local Plan Review New Protection for Open Space; and,
- Appendix C: Retained Local Plan Policies.
- Appendix D: Respondent List (alphabetical and number order)

Contents

Introduction to this summary	1
Contents.....	3
1. Introduction	6
2. Section 4: Development Strategy	10
3. DS1: Bristol City Centre	14
4. Section 4.1.14: Old Market Neighbourhood Development Plan	17
5. Section 4.1.14: Agent of Change principle	17
6. DS2: Bristol Temple Quarter	18
7. DS3: St Philip’s Marsh	22
8. DS4: Western Harbour	28
9. DS5: Frome Gateway.....	38
10. Section 4.2: East Bristol.....	41
11. DS6: Lawrence Hill.....	42
12. DS7: Central Fishponds	44
13. Section 4.3: South Bristol	46
14. DS8 Central Bedminster	48
15. DS9: Brislington	53
16. Section 4.3.10 – 15: Hengrove and Knowle West.....	56
17. DS10: Changes to the Green Belt in South Bristol	59
18. DS11: Development allocations – southwest Bristol	63
19. DS12: New Neighbourhood at Bath Road.....	69
20. Section 4.4: North Bristol	71
21. DS13: Lockleaze.....	73
22. DS14: Central Southmead	76
23. Section 4.4.11 – 13: Lawrence Weston.....	77
24. IDC1: Development contributions and CIL.....	77
25. Section 6: Urban Living	80
26. UL1: Effective and efficient use of land	81
27. UL2: Residential densities	84
28. Section 7: Housing.....	87
29. H1: Delivery of new homes.....	88
30. H2: Preventing the loss of residential accommodation.....	90

31.	H3: Making the best use of site allocations	91
32.	H4: Housing type and mix	92
33.	H5: Self-build and community-led housing	94
34.	H6: Homes in multiple occupation and other shared housing	99
35.	H7 Managing the development of purpose-built student accommodation.....	103
36.	H8: Older people's and other specialist needs housing.....	115
37.	H9: Accessible homes.....	116
38.	H10: Planning for traveller sites.....	118
39.	Section 8: Economy.....	119
40.	E1: Inclusive economic development	120
41.	E2: Employment land strategy	122
42.	E3: Location of office development	125
43.	E4: Industry and Distribution Areas	126
44.	E5: Avonmouth Industrial Area and Bristol Port.....	128
45.	E6: Protecting living conditions in Avonmouth village	129
46.	E7: New workspace within mixed use development	130
47.	E8: Digital connectivity and inclusion	132
48.	Section 9: Shopping Services and the Evening Economy: Retained policies	133
49.	Section 10: Green Infrastructure	134
50.	GI1: Local Green Space	139
51.	GI2 Reserved Open Space	141
52.	GI3 Incidental Open Spaces	144
53.	GI4 Stapleton Allotment and Holdings – Food Growing Local Green Space	146
54.	Food systems and Pollinating Insects	147
55.	Section 11: Transport.....	148
56.	T1: Development and transport principles	149
57.	T2: Transport schemes.....	151
58.	T3: Car and cycle parking provision for residential development	154
59.	T4 Cycle parking provision for B1 office development	156
60.	T5: Provision of infrastructure for electric and other low emission vehicles	157
61.	Section 13: Climate Change and Sustainability.....	160
62.	CCS1: Climate change, sustainable design and construction.....	163
63.	CCS2 Towards zero carbon development	168
64.	CCS3 Adaptation to a changing climate	182

65.	CCS4: Resource efficient and low impact construction	184
66.	CCS5: Renewable energy development	186
67.	Flood Risk and Water Management	187
68.	Section 14: Design and Conservation	188
69.	DC1 Liveability in residential development including space standards.....	189
70.	DC2 Tall buildings.....	192
71.	DC3: Local Character and Distinctiveness.....	194
72.	Section 15: Health and Wellbeing.....	195
73.	HW1: Pollution Control and Water Quality	196
74.	HW2: Air Quality	198
75.	HW3: Takeaways.....	200
76.	Utilities and Minerals: Retained Policies.....	202
77.	Consultation Process.....	202
78.	Plan Structure.....	203

Appendix A: Bristol Local Plan Review Draft Site Allocations

Appendix B: Bristol Local Plan Review New Protection for Open Space

Appendix C: Retained Local Plan Policies

Appendix D: Respondent List

1. Introduction

Overview: In total, 89 respondents made 101 comments regarding the 'About the Local Plan Review' introduction, which included the vision for the Local Plan.

Table 1 Summary of consultation responses to elements of the policy

Key Themes	Respondent Reference
<p>About the Local Plan Review</p> <p><i>Comments in support (8):</i> Comments expressed general support for the principle of a review of the Local Plan and the opportunity to comment on the draft proposals.</p> <p><i>Comments in neither support nor objection (28):</i> Many comments made reference to the relationship between the Local Plan Review and the Joint Spatial Plan, expressing concern that the JSP Examination has not concluded and that the Local Plan Review relies on the assumptions and draft policies of the JSP, which are not yet definite. Some respondents felt that this impedes the ability to comment on the Local Plan Review at this stage and creates uncertainty for the delivery of the plan. One comment considered that it is important that the LPR does not adversely impact other neighbouring authorities, particularly with regard to infrastructure. One respondent felt that references to the JSP were confusing in general.</p> <p>Numerous respondents made reference to the declaration of a climate emergency by Bristol City Council in November 2018, considering that this must be fully reflected and prioritised in the Local Plan Review. Several comments stated that the Local Plan Review does not currently place enough emphasis on climate change or demonstrate an appropriate level of urgency. One comment stated that reference to Habitat Regulation Assessment within the Plan needs to include a recognition that there is a need to enhance, as well as avoid, harm.</p> <p>Several comments expressed general opposition to an orbital road route at Whitchurch Lane.</p>	<p>104, 106, 118, 196, 309, 322, 372, 387, 403, 420, 441, 504, 514, 551, 558, 584, 587, 594, 603, 632, 639, 667, 752, 820, 825, 830, 831, 833, 837, 843, 854, 862, 887, 954, 956, 964, 965</p>
<p>Vision:</p> <p><i>Comments in support (18):</i> Most comments expressed general support for the content of the Local Plan Review Vision, with some respondents citing specific aspects of the vision that they particularly supported, which included:</p> <ul style="list-style-type: none"> • Aspirations to narrow inequality and deprivation; • The concept of inclusive economic growth; • The aspiration to exceed housing figures; • The approach to 'urban living' and optimising use of brownfield land; • Achieving sustainable development; • Commitments to safeguarding environmental assets and providing a high quality, healthy environment; and, • The reference to food growing. <p>Of the comments supporting the vision, many made suggestions for additional inclusions which they considered could enhance the vision. These included</p> <ul style="list-style-type: none"> • A specific reference to protecting and increase tree canopy cover; 	<p>118, 196, 216, 309, 372, 410, 415, 442, 490, 507, 512, 524, 535, 541, 596, 605, 614, 617, 619, 621, 635, 637, 644, 646, 647, 648, 656, 657, 658, 664, 671, 761, 802, 807, 811, 836, 839, 840, 841, 842, 846, 857, 861, 863, 866, 867, 871, 873,</p>

<ul style="list-style-type: none"> • An understanding of the barriers to access to open space and reference to creating safer spaces for women and children; • An expression of housing targets as minimum figures; • An explicit approach to addressing gentrification and clarity over provision of social housing; and, • Updated housing numbers if arising from the Joint Spatial Plan examination. <p><i>Comments in objection (7):</i> The majority of comments objected to the Vision on the basis that it is not sufficiently radical in its approach to addressing climate change in light of the recent declaration of a climate change emergency, and recent reports from the IPCC and IPBES on the rate of climate change and biodiversity loss. These comments suggested the priority in the plan and all of its policies should be the target to be carbon neutral by 2030. One comment stated an objection to the vision for focusing too heavily on housing delivery, with insufficient emphasis on employment provision, particularly in South Bristol.</p> <p><i>Comments in neither support nor objection (28):</i> Many of the comments referred to the declaration of a climate emergency by Bristol City Council in 2018, and stated that the Local Plan needs to reflect this declaration and have a more radical approach in order to meet the target of being carbon neutral by 2030.</p> <p>In addition, comments referred to the need for the Plan to place greater emphasis on minimising the impacts of development for health and wellbeing as well as environmental impacts, with one comment referring to a 'regenerative city' approach incorporating green roofs, street trees and pollinators. Reference to the One City Plan commitment to double tree cover by 2046 was also made. One comment expressed concern over the impact of implementing the vision's scale of development on the environment and climate change resilience.</p> <p>Some comments referred to the relationship between the Joint Spatial Plan and the Local Plan Review, stating that the outcome of the Examination of the JSP and Joint Local Transport Plan 4 would need to be understood to inform the Local Plan Review. One comment stated that the plan does not provide any strategic priorities therefore fails in its statutory duty, and that these would need to be created for the next stage of plan consultation.</p> <p>Several comments stated the need for the plan to reference Bristol City Council's 'Social Value Policy'. One comment stated that the Vision should have more emphasis on meaningful community engagement.</p> <p>Two comments stated that there needs to be greater emphasis on South Bristol in the Vision in order to address the north/south economic divide in the city, and with particular reference to employment and the economy.</p>	<p>877, 878, 882, 885, 887, 904</p>
<p>Draft Local Plan Policies</p> <p><i>Comments in support (1):</i> One comment considered that the overall direction of policies is positive for a more sustainable development of Bristol in the future.</p> <p><i>Comments in neither support nor objection (9):</i> Two comments suggested that a policy presuming refusal of all new planning applications for outdoor advertising should be included in the plan. One comment suggested a social value policy should be included in the plan, while another comment considered that there is</p>	<p>7, 309, 367, 617, 794, 811, 837, 839, 862, 867</p>

insufficient consideration in the draft policies on safety in development, particularly women's safety.

Additional comments were made as follows:

- One comment considered that the plan should provide a positive policy framework to support the North Somerset Council Local Plan in relation to the growth of Bristol Airport.
- One comment queried how successful implementation of policies would be measured and suggested a Citizens Assembly could be set up to do so.
- One comment considered that the plan does not provide sufficiently strategic policies, however a separate comment considered that the plan needs to separate strategic and non-strategic policies for clarity.

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 2 Comments from statutory bodies and partnerships

Consultee	Reference
Marine Management Organisation: Comments related to the inclusion of marine planning to the Local Plan in line with the NPPF and Marine and Coastal Access Act. Reference is made to the South West Marine Plan, which will be statutory from 2020. Proposed additional paragraph to include within introductory text, is suggested. Comment to mention that once the Marine Plan is adopted, consultation regarding implementation of policies within the Local Plan will follow.	Ref 7
North Somerset Council: Comment that NSC would like to reiterate those made in Feb 2018 LPR, particularly regarding NSC's willingness to seek and agreed common approach in respective Local Plans to the land inside the SBL/MetroBus at South West Bristol with the aim of ensuring enduring Green Belt boundary and comprehensive plan for the area.	Ref 403
Sport England: Acknowledge that sport is identified in the vision for Bristol at Para 2.3. Sport England has developed a tool on the economic value of sport which demonstrates how sport benefits local community.	Ref 442
Highways England: Comment that Highways England are generally interested in the potential traffic impacts of any development site proposals and/or policies coming forward through the Local Plan and need to ensure that these are fully assessed during the plan-making stage. It is imperative to identify any improvements needed to deliver aspirations at this early stage, as set out in Government policy.	Ref 632
Natural England: Natural England is supportive of the adopted Plan and recognises the need to update it to reflect the JSP and national policy changes.	Ref 820
Historic England: Historic England state that their position remains broadly as set out on 12 April 2018 in response to previous round of consultation on the Local Plan. Historic England appreciates BCC commitment to seek to address their concerns.	Ref 956
Environment Agency: EA welcome the opportunity for further discussion, as work on the emerging local plan progresses.	Ref 964

2. Section 4: Development Strategy

Overview: In total, 68 respondents made 93 comments regarding the Development Strategy. Key themes are identified below.

Table 3 Summary of consultation responses to elements of the Policy

Key Themes:	Respondent References
<p>General principle</p> <p><i>Comments in support (13):</i> Comments expressed general support for the development strategy, particularly in relation to optimising development on brownfield land and the principle of development at the Growth and Regeneration Areas. Reference was also made to supporting the strategy's alignment with the Joint Spatial Plan.</p> <p>Several comments expressed support for the development strategy in relation to specific development sites; these were considered to align with the strategy.</p> <p>One comment expressed support for safeguarding established businesses through the agent of change of principle.</p> <p><i>Comments in objection (3):</i> It was considered that there is insufficient emphasis placed in the strategy on providing employment land and the creation of jobs, particularly to support the level of housing development which is proposed. It was considered that there is insufficient evidence such as an Employment Land Study to inform the requirements for employment and business, including the types of employment that will be needed and its location. Comments were made in particular with reference to the need for economic development in South Bristol.</p> <p><i>Comments in neither support nor objection (31):</i> A number of comments referred to the need to update the development strategy in light of the climate change emergency declaration by Bristol City Council, with one comment stating that the plan's strategy focuses more on social and economic sustainable development than environmental.</p> <p>Several comments referred to a need for co-ordinated approach to development, utilising masterplans and design briefs as well as ensuring that the natural environment is considered alongside policies.</p> <p>Some comments considered that the development strategy had omitted or had insufficient emphasis in some policy areas. In particular, the approach to employment land was considered lacking by some respondents, who requested that more specific targets for employment land are cited, informed by an appropriate base. It was suggested that the plan should support a genuine mix of land use across the city, safeguarding existing industrial and employment land and ensuring sufficient land for long-term affordable workspace. It was raised as a concern that housing delivery in existing industrial areas could lead to the closure of businesses.</p> <p>Other comments considered that the development strategy needed greater focus and clarity on children, including the 'child friendly city' principles regarding play</p>	<p>19, 85, 101, 104, 165, 291, 309, 314, 326, 367, 437, 490, 524, 609, 612, 619, 635, 646, 647, 648, 657, 772, 778, 783, 790, 798, 800, 802, 807, 819, 820, 821, 825, 830, 839, 842, 844, 846, 854, 865, 871, 873, 877, 878, 885, 894, 904</p>

Key Themes:	Respondent References
<p>and child-friendly design, and on ensuring greater measures for safe and inclusive urban infrastructure to discourage anti-social behaviour and encourage community participation. One comment requested that inequality is explicitly referenced in the plan, with greater focus on a holistic approach to improving deprived areas. Concern was expressed that the strategy may focus poor quality development in poorer areas with less ability to participate in the planning process.</p> <p>One comment considered that the plan and strategy is inconsistent in its approach to Bristol's 24-hour economy, with no single and clear definition of what defines Bristol's nightlife and culture as a '24-hour city'. It was suggested that site allocations and reserved open spaces in the plan should be identified for festival and event uses.</p> <p>A number of comments related to the Development Strategy diagram on Page 10 of the Plan, stating that it should be clearer with more detailed annotation on key development locations, urban living sites and Green Belt areas being lost. One respondent considered that there is insufficient focus on north-west Bristol. It was suggested that a cross-reference to the development allocations document should be made in the text of this section.</p> <p>A number of other suggestions were made for the development strategy to:</p> <ul style="list-style-type: none"> • Support opportunities for urban farming; • Make use of unused and derelict buildings to create new housing and to engage a circular economy; • Provide protection to suburban gardens. 	
<p>Housing numbers</p> <p><i>Comments in support (6):</i> Several comments expressed general support for the ambition to exceed the stated housing numbers and suggested that the figures should be expressed as a minimum in order to better emphasise this element of the plan and reflect a 'step change' in the Plan.</p> <p>Comments also expressed support for affordable housing, elderly and accessible housing, self-build housing and the desire to create a healthy environment with better transit systems and protected heritage assets. One comment stated that sufficient infrastructure must support housing delivery.</p> <p><i>Comments in objection (4):</i> Comments were raised as follows:</p> <ul style="list-style-type: none"> • Two comments expressed general objection to the proposed housing figures and the aspiration to exceed the housing delivery target. • One comment objected on the basis that the Joint Spatial Plan housing target is likely to increase and that this will need to be reflected in the Local Plan Review to comply with the NPPF. • One comment objected to the Local Plan Review's reliance on the Joint Spatial Plan for the affordable housing target, stating that this is likely to be modified through Examination and is not sufficiently viability tested. <p><i>Comments in neither support nor objection (5):</i> Two comments queried the housing target figures, with one considering that the Plan target would need to</p>	<p>118, 323, 446, 490, 646, 753, 797, 821, 855, 858, 866, 870, 871, 877, 888</p>

Key Themes:	Respondent References
<p>reflect the Joint Spatial Plan if this increased during the Examination process. A further comment queried whether this figure includes student bedspaces, uses reliable population predictions and takes into account the effects of Brexit.</p> <p>Additional comments were made as follows:</p> <ul style="list-style-type: none"> • One comment noted that while the Development Strategy states support for Build to Rent, this is not then referenced in the rest of the plan. • One comment stated that woods and trees should be protected in the context of high levels of housing growth, particularly ancient woodland and veteran trees. 	
<p>Transport / Mass Transit</p> <p><i>Comments neither support nor objection (7):</i> Two comments considered that the plan could be strengthened in relation to protection and encouragement of walking as a mode of transport. It was considered that the Plan will need to cross-reference and refer to the Joint Local Transport Plan 4 and Bristol Transport Strategy in due course, and should refer to the Transport Development Management Guide. One comment noted that a Walking and Cycling Infrastructure Plan is in preparation.</p> <p>One comment stated that transport infrastructure improvements were required in development areas prior to major development, or there will be harmful effects on air quality. Another comment stated that the plan should seek to provide for a transport revolution in order to meet zero carbon targets, suggesting that the densities of development planned cannot accommodate the private car as a preferred mode of travel.</p> <p>Two specific schemes were referenced. One respondent raised the need to maximise the benefit of the Metrowest scheme through provision of a new rail station at Ashton Gate. One respondent suggested that a Henbury Loop could be supported by development at Henbury.</p>	<p>612, 623, 791, 802, 805, 807, 829</p>
<p>Urban Living</p> <p><i>Comments in support (9):</i> The majority of comments in support of the principle of urban living considered that the approach would enable delivery of housing targets provided the Council adopts a positive and proactive approach to assessing applications for taller buildings and higher density schemes. It was considered that the housing figures should be expressed as a minimum in support of this.</p> <p><i>Comments in objection (1):</i> One comment expressed objection to the density proposed through the urban living approach, due to a lack of a city-wide affordable public transport system and due to the topography of the city.</p> <p><i>Comments in neither support nor objection (5):</i> These include:</p> <ul style="list-style-type: none"> • One comment stated that the definition of urban living in the policy document is not clear and is inconsistent. • One comment stated that there should be a strategy to protect suburban gardens for climate change mitigation, wildlife and biodiversity. • Several comments stated that higher densities and urban living does not account for housing typologies that may be needed and stated that adjacent authorities should be engaged with to plan for taking a greater proportion of 	<p>323, 490, 524, 632, 639, 646, 647, 648, 656, 657, 671, 820, 821, 877, 888</p>

Key Themes:	Respondent References
Bristol's housing need.	
<p>Aims of the Plan</p> <p><i>Comments in support (2):</i> Two comments expressed general support for the aims of the plan, with one comment specifically expressing support for the ambitions of inclusive economic growth, high quality development and the level of growth and regeneration.</p> <p><i>Comments in neither support nor objection (7):</i> Several comments raised concern that specific targets for employment land were not included in the plan. The emerging employment land strategy evidence base was requested. In relation to housing, several comments considered that housing targets should be expressed as a minimum in the aims of the plan.</p> <p>One comment stated that the aim of the plan should be to deliver sustainable development as this would align with the NPPF. One comment suggested that the ambition for a 'Gold Standard' sustainable food city should be reflected in the plan aims. One comment suggested that there should be specific reference to Bristol Airport.</p> <p>One comment raised concern that the aims of the plan do not result in areas being gentrified, and a loss of lower paid jobs.</p>	609, 647, 648, 657, 802, 807, 823, 836, 862

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 4 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Highways England: Highways England noted concern over the limited detail within the JSP that has been forthcoming regarding the assessment of the impact of the 'Urban Living' allocation. Comment that the locational flexibility of this policy means that development could be located anywhere within the existing urban area of Bristol. It is acknowledged that the Local Plan will identify specific areas to focus development, but the broader JSP policy will remain. Consideration should be given to further qualifying the concept of 'Urban Living' and where development will be delivered.</p>	632
<p>Natural England: Noted support for Green Infrastructure as a cross-cutting theme in the plan and the protection of green corridors, enhanced public access and improving walking and cycling along rivers and waterways as highlighted in relevant place-based policies. Considered that while brownfield sites at higher densities are efficient use of land, these can contain important wildlife.</p>	820
<p>Bristol Water: Comment provided that growth in the Bristol region could lead to a significant increase in demand for water and Bristol Water will need to consider this issue in long-term plans for water resource management.</p> <p>Reference is made to Bristol Water's formal long-term Water Resource Management Plan, which informs their water management approach from 2020-2045.</p>	790

3. DS1: Bristol City Centre

Overview: In total, 42 respondents made 65 comments regarding policy DS1: Bristol City Centre. Key themes are identified in the table below.

Table 5 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General Principle of Development</p> <p><i>Comments in support (15):</i> Several comments expressed general support for the aims and approach of policy DS1, including its references to promoting Bristol as a 'global city' and the suitability of the city centre for an 'urban living' approach. The sustainability of city centre development was also identified. Support was expressed for the inclusion in the policy of support for mixed use development; student accommodation; arts and cultural facilities; and mixed uses alongside retail in Broadmead shopping area.</p> <p>Support was expressed for specific areas that are identified in the policy, including Western Harbour, St Philips Marsh, Frome Gateway, Temple Quarter, Redcliffe, and the reference to consolidation and expansion of the University of Bristol and Bristol Royal Infirmary sites. Support was expressed for the place principles and their ambition.</p> <p><i>Comments neither in support nor objection (13):</i> Several comments raised concern that other plans are not sufficiently referenced in the policy and that it is not clear how these plans will relate to the policy. These plans were the City Centre Framework consulted in March 2018, the Redcliffe Plan and the Temple Quarter Enterprise Zone Spatial Framework. It was also stated that the policy should make more reference Old Market NDP. A need for a more detailed framework on High Street/Wine Street and the regeneration of Castle Park was stated.</p> <p>Concerns were raised that Stokes Croft does not receive enough focus in the policy despite having a high density of Listed Buildings which are underutilised and in need of renovation, and high levels of deprivation. A suggestion was made that Stokes Croft should be identified in the plan for mixed use housing, employment, retail and leisure.</p> <p>Concern was raised about the potential impact of development arising from Policy DS1 on inequality in the city, with concerns that any development would need to foster genuine cohesion and accessibility amongst communities, avoiding gentrification and exclusion of marginalised groups while reflecting the diversity of the city. Community involvement in development proposals and the development of cultural facilities was suggested.</p> <p>One comment stated that the place principles of the policy should include a reference to zero carbon and a presumption against parking provision in city centre development unless for disabled access.</p> <p>In relation to retail, comments stated that references to retained policies such as BCAP13 were unclear, including its compatibility with the new draft policy. It was also suggested that it may be appropriate to review and update the evidence base</p>	<p>48, 76, 379, 524, 603, 612, 619, 631, 632, 647, 657, 671, 696, 802, 816, 817, 818, 844, 846, 868, 877, 881, 885, 887, 891, 892, 957, 963, 964</p>

Key Themes	Respondent References
for retail, specifically the 2013 Bristol City Centre Retail Study Stages 1 & 2.	
<p>Employment</p> <p><i>Comments in support (1):</i> A comment welcomed support for a wider mix of uses in Broadmead, which was considered necessary for it to be able to respond to rapid economic change when necessary.</p> <p><i>Comments neither in support nor objection (9):</i> Some comments related to the need for different types of workspace in the city centre to be delivered through the policy, including small, inexpensive workspace for the third sector and the need for the policy to refer more to Research and Development uses in the centre (which often require a larger floorplate), particularly due to the proposed location of the new University of Bristol campus.</p> <p>Several comments raised concern over the type of employment that the policy would deliver and the potential for harmful effects to local people through social exclusion and gentrification. In particular, concern was raised over the loss of manual, low-paid jobs in the city centre which serve local people, and which may be displaced to locations requiring costly and longer travel. It was suggested that the policy should be ensuring it provides local employment for residents of neighbouring areas such as Newton, Barton Hill, Lawrence Hill and Old Market.</p> <p>One comment stated that the policy should not need to provide workspace as part of development as other policies in the Local Plan Review identify employment areas.</p>	216, 811, 817, 818, 842, 844, 888, 904, 957, 963
<p>Housing</p> <p><i>Comments in objection (2):</i> One comment objected to the requirement in the policy for housing proposals in Growth Areas to provide employment as part of their scheme where they are replacing an employment unit no longer in use. The respondent considered that there is a risk that this could undermine the priority of maximising housing delivery. Another respondent objected to higher density housing in the city centre, stating that this requires improved infrastructure to support it while people prefer to live at lower densities.</p> <p><i>Comments neither in support nor objection (2):</i> A comment was made that policy DS1 does not provide specific expectations on the number of homes or hectares of employment space expected to be delivered through policy DS1, as well as policies DS2-5. A suggestion was made that housing could be delivered through redevelopment of the Bearpit roundabout or the redevelopment of the King Edwards Building at the BRI if not needed by the hospital.</p>	216, 603, 888, 963
<p>Transport</p> <p><i>Comments in support (3):</i> Two comments supported the reference to pedestrian provision in the policy. One comment welcomed the recognition in the policy of Temple Meads station as a transport hub and requested that MetroWest is specified among the 'existing and proposed public transport services'.</p>	216, 401, 791, 805, 838, 963
<p>Development locations</p> <p><i>Comments neither in support nor objection (2):</i> One comment expressed support for the growth and regeneration of the St Philips Marsh area for a mix of uses including workspace and provision of new homes. However, it also sought clarity</p>	631, 876

Key Themes	Respondent References
<p>in the policy on the amount of development that is sought, suggesting that minimum amounts of employment land and residential development being sought at the development locations should be stated clearly in the policy.</p> <p>A second comment stated that the Old BRI site should be removed from the allocation of DS1 as it is currently subject to proposal for a mix of residential and student use. The respondent considered that the Old BRI site has more in common with the Broadmead and St. James' Barton area.</p>	
<p>University of Bristol and student accommodation <i>Comments in support (1):</i> One comment stated support for overall policy direction in terms of student housing but requested that the policy text should confirm student accommodation as acceptable in the centre and the reference to policy H7 is removed from the policy text.</p> <p><i>Comments neither in support nor objection (6):</i> There was some concern expressed over the concentration of student accommodation in some areas, including St Philips Marsh, Temple Meads and Old Market area. One comment stated that the concentration of student accommodation may result in a city centre which reflects a narrow segment of society and loses its specialist uses. One comment stated a need for stronger policies.</p> <p>One comment queried if areas in the centre could be designated as unsuitable for student accommodation such as historic areas (specifically cited Tailors Court).</p> <p>One comment queried why the policy provides qualifications / conditions for student accommodation development, when this is not the case for any other development types.</p>	216, 255, 643, 811, 892, 957, 963
<p>Tall Buildings and Urban Living: <i>Comments in support (3):</i> These comments were in general support of the approach to tall buildings in the city centre, and one comment specifically referenced support for tall buildings in Redcliffe.</p>	852, 885, 891
<p>Flood Risk: <i>Comments neither in support nor objection (4):</i> One comment stated that the policy was too vague with regard to flood risk. Another comment suggested that flood mitigation needed to be stipulated as part of the design and planning brief, while another comment suggested that a reference should be made to managing flood risk through green infrastructure.</p>	216, 603, 802, 964

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 6 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Environment Agency (2): Request for revision to para 4.1.8 to include support for improved green transport links in the city. These could be incorporated into flood defence improvements to provide multiple benefits for the residents of Bristol, and opportunities should be taken to embed these principles into new development.</p> <p>Comment that flood risk should be a key consideration for many parts of Bristol</p>	Ref 964

City Centre in particular St Philips Marsh, Bristol Temple Quarter and Western Harbour. In St Philips Marsh and Bristol Temple Quarter flood depths could currently reach up to a metre and this will increase with climate change, which poses a risk to life. Flood risk needs to be addressed in a strategic manner before development can come forward in this location. Large scale on-site mitigation would increase flood risk elsewhere which is unacceptable. This could be addressed as part of an overall flood risk management strategy.	
Highways England (1): Comment that within this location there is already a substantial pipeline stock of potential office development and support development in the City Centre as this offers the best opportunity of sustainable (in transport terms) living, with employment and other services close by.	Ref 632

4. Section 4.1.14: Old Market Neighbourhood Development Plan

Two respondents (ref 647, 963) commented on the Old Market Neighbourhood Development Plan. One comment stated that there is a need to protect and improve the LGBT area of the Old Market as well as road improvements such as widening the main street and removing traffic. Another comment queried whether the Neighbourhood Development Plan should be reviewed following the Local Plan Review to remain consistent.

5. Section 4.1.14: Agent of Change principle

One respondent (ref 811) commented on the Agent of Change Principle in this section of the plan (the principle is also presented under policy HW1). This comment stated that the protection of existing venues must be meaningful and that developers should be required to hold warranties and insurances as necessary to improve noise insulation if needed and respond to post-construction complaints.

6. DS2: Bristol Temple Quarter

Overview: In total, 26 respondents made 56 comments regarding policy DS2: Bristol Temple Quarter. Key themes are identified in the table below.

Table 7 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General Principle of Development</p> <p><i>Comments in support (6):</i> Comments expressed general support for the approach to this area within the policy, and for a masterplan-led approach to development. However, while one respondent stated the need for masterplans to be flexible to adjust to the market and queried if a reference to it was needed in the policy text, other comments supported the inclusion of the masterplan in policy text.</p> <p>Support stated for the place principles, for the location of appropriate tall buildings in this area and for the reference to bringing forward ‘innovative’ development.</p> <p><i>Comments neither in support nor objection (9):</i> Several comments raised a query as to why the Temple Quarter Enterprise Zone Spatial Framework is not cited in the policy text, as well as clarity as to why a southern area of the zone has been removed from the policy since the 2018 consultation. One respondent queried the lack of reference to the Totterdown Bridge Site. One comment requested that the policy provided quantified amounts of housing and employment space that are expected.</p> <p>Comments stated that to create inclusive development, diverse community groups need to be involved in design of schemes in a long-term, non-tokenistic manner. One comment stated that the masterplan was not being effectively communicated to local businesses and residents. A comment raised concern that retail and leisure use in this area might potentially undermine Bristol Shopping Quarter, which should remain the primary focus of retail in the city centre.</p> <p>Some comments made suggestions for the area, including that it might be an appropriate area to bring forward urban farming and social enterprise for high-tech solutions, and that night clubs or a tourist quarter could be appropriate.</p>	76, 216, 603, 612, 627, 657, 811, 816, 817, 844, 846, 887, 891, 892, 963, 964
<p>Employment</p> <p><i>Comments neither in support nor objection (5):</i> Several comments raised concern over the type of employment that the policy would deliver and the potential for harmful effects to local people through social exclusion and gentrification. In particular, concern was raised over the loss of manual, low-paid jobs in the city centre which serve local people, and which may be displaced to locations requiring costly and longer travel. New employment development should maximise local resource use and create new employment and industry opportunities for local residents.</p> <p>One comment stated the need for the policy to refer more to Research and Development employment uses. Another comment stated that the policy should remove the requirement to provide workspace as part of development, as other policies in the Local Plan Review identify employment areas and it could risk</p>	751, 811, 817, 844, 888

Key Themes	Respondent References
making development unviable.	
Housing <i>Comments in support (1):</i> One comment supported housing and flats in locations such as the Dings and Temple Back. <i>Comments in objection (1):</i> There was one objection to the requirement for some workspace to be provided in schemes which are replacing an employment unit that is no longer in use, as it was considered that this would undermine the priority of maximising housing delivery. <i>Comments neither in support nor objection (1):</i> One comment stated that there was no clarity on the number of homes expected to be delivered.	603, 888, 963
Temple Meads redevelopment <i>Comments in support (4):</i> Comments were in general support of the redevelopment of Temple Meads, citing that this could be a catalyst for change in the area and the positive impact it could have on the patronage of the local rail network and overall rail use. One comment stated the positive impacts this could have on improving access to night life and the evening economy and reducing social isolation. One comment stated that the plan lacks detail but would be supportive of a mixed-use development including shops, restaurants and a public transport interchange (citing London Paddington as an example). The need for the development to include electrification of the line and to have improved connectivity locally and across wider Bristol, was also stated. <i>Comments neither in support nor objection (1):</i> One comment stated the need for the station to be accessible for a range of disabilities and connect efficiently with all areas of the city.	76, 401, 816, 887, 963, 964
Silverthorne Lane <i>Comments in support (3):</i> Three comments stated general support for the provisions of the policy, including the development of student accommodation and the suitability of the area for tall buildings. <i>Comments neither in support nor objection (1):</i> One comment stated the need for improved infrastructure and services to support new housing.	816, 887, 892, 963
Temple Island <i>Comments in support (3):</i> Comments expressed general support for the policy proposals, including the provision of the University of Bristol campus. One comment stated strong support in principle but expressed concern about the need for a masterplan to guide development, and that this could delay the delivery of schemes. It suggested that a provision is included in the policy text which states that development preceding a masterplan must demonstrate accordance with the masterplan principles. <i>Comments neither in support nor objection (2):</i> A suggestion was made for a 'Green Museum' at this location to relate to Bristol's previous role as Green Capital. A separate suggestion was made that the site should be used for Bristol Arena and if not, it should be allocated for affordable housing for key workers, as	166, 657, 737, 816, 963

Key Themes	Respondent References
the policy does not currently make clear if any affordable houses will be provided at this site.	
York Road/Mead Street <i>Comments neither in support nor objection (2):</i> One comment stated the need for a masterplan to include consideration of the interface between York Road and Central Bedminster, as development would increase footfall and vehicle traffic between these areas. One comment stated that the mixed uses would be complementary to existing high growth employers in the area.	627, 817
University of Bristol and student accommodation: <i>Comments in support (4):</i> Comments in support of the policy expressed general support for the principle of a campus. Comments also referred to support for pedestrian links to Temple Meads as part of the development and made a statement that if the academic floorspace increases further, so should Purpose Built Student Accommodation (PBSA) provision. Support for careful management of student accommodation was also expressed. <i>Comments neither in support nor objection (1):</i> One comment stated that to maximise benefits of the campus, more explicit reference to Research and Development uses and facilities should be made in the policy text.	415, 816, 817, 887, 963
Infrastructure and Transport: <i>Comments in support (1):</i> One comment stated support for improvements to walking and cycling routes, and provision of new infrastructure and public realm improvements, however details are requested on the mechanism for delivery and reassurance that sites developed early in plan process won't be required to contribute disproportionately. <i>Comments neither in support nor objection (6):</i> Comments made the following suggestions relating to infrastructure and transport: <ul style="list-style-type: none"> • Better connectivity between Temple Quarter and Redcliffe; • Provision of adequate cycle parking space for every new job (suggested minimum ratio of 2 to 3); • For taxi ranks to be considered early in the development process and to consult the taxi industry; • For improvements to cycle and highways around Temple Meads alongside its redevelopment; and, • For more reference in policy to ferry services, alongside a suggestion that a river walkway could be created in the same manner as much of the harbourside. 	216, 802, 807, 816, 820, 858, 963
Flood risk: <i>Comments neither in support nor objection (1):</i> One comment stated that the requirement for developers to carry out the sequential test as unreasonable and that it should have been undertaken by the Council prior to allocating a site so that the developer does not have justify a proposal already allowed for in policy. A request for the Council's assessment was made.	892, 964
Heritage assets: <i>Comments neither in support nor objection (1):</i> One comment stated that the place principle stating, "development will preserve and enhance heritage assets, incorporating them imaginatively into new developments...." needs to be clarified. While accepting the aim of retaining and incorporating all heritage assets, the	892

Key Themes	Respondent References
respondent considered that this was not always possible and therefore the policy should state that each application will be required to carry out appropriate assessments of significance. This would also include setting out a hierarchy whereby Grade I and II* structures are most important, with locally listed buildings considered to be less significant. As currently drafted, the policy was considered to be at odds with the NPPF in relation to heritage.	

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 8 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Environment Agency (3): Currently object to development in parts of this area without a suitable flood risk management strategy, with a reasonable expectation of delivery. There should also be safe, functional access/egress as outlined in the Planning Practice Guidance.</p> <p>Comment that safe access and egress cannot be achieved along Cattle Market Road under the railway bridge/track. A connection from Bristol Temple Meads to St Philips Marsh should be above the 1 in 200-year climate change level. This could be achieved through a new footbridge over the railway or access from one of the platforms within the station.</p> <p>Comment that flood risk is a key consideration for many parts of Bristol City Centre in particular St Philips Marsh, Bristol Temple Quarter and Western Harbour. In St Philips Marsh and Bristol Temple Quarter flood depths could currently reach up to a metre and this will increase with climate change, which poses a risk to life. Comment that flood risk needs to be addressed in a strategic manner before development can come forward in this location. Large scale on-site mitigation would increase flood risk elsewhere which was unacceptable. This can be addressed as part of an overall flood risk management strategy.</p> <p>Comment that given the quantity of new homes proposed, it is imperative that a suitable flood risk management strategy is prepared that manages flood risk for 100 years (taking into account the predicted impacts of climate change) without increasing flood risk to third parties.</p> <p>Comment that Policy Text regarding flood risk was not considered to be strong enough, as most of Bristol Temple Quarter is at high risk of flooding. Query as to how the Sequential Test will be applied within this area if the majority of the area is in Flood Zone 3. The majority of this area is not suitable for development without a flood risk management strategy that will ensure that development is safe for its intended lifetime of 100 years without increasing flood risk elsewhere. These areas will still be in Flood Zone 3, even with adequate flood risk management in place. In line with the National Planning Policy Framework the Sequential and Exception tests will need be applied. Production of a Flood Risk Assessment is required but will not necessarily overcome these issues. Flood risk needs to be considered strategically rather than on a site by site basis.</p>	Ref 964
Natural England (1): Considered that more specific measures regarding green infrastructure might be included around Temple Quarter and Totterdown Basin.	Ref 820

7. DS3: St Philip's Marsh

Overview: In total, 21 respondents made 52 comments regarding policy DS3: St Philip's Marsh. Key themes are identified in the table below.

Table 9 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General Principle of Development</p> <p><i>Comments in support (6):</i> The development proposed through the draft policy was supported by some respondents as an opportunity for a regenerated city quarter. It was stated by some respondents that redevelopment promoted via Policy DS3 would enable local businesses in St Philip's Marsh to become more competitive and thereby benefit Bristol's economic profile. Mixed use development, to support the city centre and to complement the adjacent Bristol Temple Quarter and to deliver significant public realm improvements, was supported by some respondents. The proposal to provide purpose-built student accommodation (PBSA) in this location, given the proximity to the new University Campus, was also supported by two respondents. One respondent raised support for the inclusion of food systems infrastructure and facilities within the draft policy.</p> <p>A more specific allocations or phasing map supported by a masterplan to guide development was suggested by some respondents. Timescales and planning status of this masterplan were requested to be outlined in policy supporting text. One respondent stated that the policy should recognise that specific sites can come forward in advance of the masterplan, provided a coordinated approach is adopted. One respondent stated that Urban Living principles could be applied, given its highly sustainable location. It was suggested that the policy be amended to state tall buildings would be appropriate subject to heritage considerations, as per other policies.</p> <p>Concern was also raised by some respondents about the absence of any reference within the draft policy to the Temple Quarter Enterprise Zone Spatial Framework (2016), which includes a number of undeveloped sites, in the Local Plan Review or supporting documents. It was requested to reinstate the southern 'arm' of Bristol Temple Quarter in the designation to reflect the area included in the previous iteration of the Local Plan Review; and for clarification as to how the Local Plan would relate to the current spatial framework.</p> <p><i>Comments neither in support nor objection (10):</i> One respondent requested amendment to the city centre boundary to include Avonmeads within the St Philip's Marsh policy area, where it was suggested that development at Avonmeads would satisfy national policy preference for development of brownfield land to meet identified needs for housing, services and significant employment for local residents. One respondent identified the opportunity through this draft policy to bring in strategic industry and businesses which would facilitate infrastructure development, particularly where outputs can be used locally e.g. in civils/construction materials. The issue of development scale was raised, with clarity requested on the acceptable building heights in St Philip's. One respondent stated that this area should not be seen as extension of Temple Quarter but as part of Lawrence Hill, Barton Hill and cater for needs of residents in</p>	<p>196, 504, 603, 631, 643, 751, 807, 811, 817, 827, 836, 846, 887, 892, 894, 963</p>

Key Themes	Respondent References
these deprived areas.	
<p>Housing</p> <p><i>Comments in support (2):</i> Both respondents raised support for mixed-use development, including the use of land adjacent to the river for residential and workspace development. It was requested by one respondent that information about the 'minimum' amounts of units / land for the mix of uses anticipated in these locations would provide certainty as to the potential minimum level of growth. One respondent provided support for the inclusion of student accommodation in this Growth Area.</p> <p><i>Comments in objection (1):</i> One comment raised in objection to the requirement for housing proposals in Growth Areas to provide employment as part of their scheme where they are replacing an employment unit no longer in use, as it risks undermining the priority of maximising housing delivery in Bristol.</p> <p><i>Comments neither in support nor objection (6):</i> One respondent raised concern that new housing should include social housing and be for local people. It was stated by another respondent that the masterplan should allocate any new residential development as Community Led Housing to achieve a wider diversity of housing types and tenures. The requirement for employment provision to become site based was requested by one respondent, with a specific ratio of homes to employment provision, rather than a policy aspiration. Further clarity was requested on how the anticipated increase in jobs will be tracked. One respondent indicated that a high-density, mixed-use development of some scale could be appropriate, to reflect the gateway role of the site and its potential to contribute towards the regeneration of the wider area. It was suggested that this could deliver significant contribution towards housing targets; opportunities for small and growing businesses; enhanced riverside walking and cycling route, including to Sparke Evans Park; and Temple Meads and the city centre.</p>	631, 643, 807, 817, 842, 846, 888, 894, 904
<p>Employment</p> <p><i>Comments in support (1):</i> One comment provided support for the redevelopment of dilapidated industrial areas and innovative reincorporation of workspace to increase jobs in area.</p> <p><i>Comments neither in support nor objection (6):</i> One respondent expressed concern over lack of consultation of local businesses in the area, which are considered an important employment source for Lawrence Hill and Easton wards. It was identified as a concern by two respondents the impact of opening these areas for development could boost the gentrification of central Bristol and risk the closure of local businesses. Emphasis on workspace within mixed-use development was supported; however, it was requested that policy wording be strengthened to facilitate this element of the policy. One respondent stated that employment areas outside of identified allocations should not be subject to the policy requirement for 'workspace' as this risks them being unviable for development.</p> <p>One respondent requested more detail on the phased delivery of development. One respondent stated that the draft policy does not demonstrate how quoted job figure would be preserved or enhanced. It was requested that the policy refers</p>	807, 811, 817, 827, 844, 888, 963

Key Themes	Respondent References
<p>to recycling and automotive industries which have an important city-wide role for the shift to a low carbon economy. The retention of railway employment sites and depot for local, regional and intercity railways was stated as important to the South West regional economy.</p> <p>It was expressed by one respondent that St Philip's has a shortage of industrial space of over 10,000 sq ft. One employer demonstrated that there is a demand for city centre science jobs, with demand for larger scale-up facilities which will require collaborative partnerships. One respondent suggested that the policy wording should encourage committed development to a specific amount of employment provision.</p>	
<p>North west St Philip's Marsh <i>Comments in support (2):</i> One respondent expressed support for the encouragement of higher density workspace/more intensive use in St Philip's Marsh.</p> <p><i>Comments neither in support nor objection (4):</i> One respondent stated that the policy needs to be clarified in relation to the areas identified within the policy area to account for land uses specific to each place, as north west St Philip's Marsh and South of Albert Road could both be interpreted as the same area. It was suggested that development from Feeder Road along the length of Albert Road is identified as a location appropriate for mixed-use development that optimises use of the river; and that the policy should be reworded to provide a mix of uses including residential in both the North West of St Philip's Marsh and South of Albert Road areas.</p> <p>One respondent stated that, given its proximity to the site of the new Temple Quarter Enterprise Campus, the text referring to North West St Philip's Marsh should be updated to state that supporting development including purpose-built student accommodation (PBSA) should be encouraged in this area. One respondent requested further clarity on how workspaces and offices would be delivered when residential uses will likely be more valuable. It was suggested by one respondent that 'higher intensity workspace/offices and other more intensive forms of use appropriate to a location adjacent to the city centre' was too vague, and a suggest clarification of this policy text.</p>	631, 643, 817, 827, 836, 964
<p>South of Albert Road <i>Comments neither in support nor objection (2):</i> One respondent stated that the policy needs to be clarified in relation to the areas identified within the policy area to account for land uses specific to each place, as north west St Philip's Marsh and South of Albert Road could both be interpreted as the same area. It was suggested that development from Feeder Road along the length of Albert Road is identified as a location appropriate for mixed-use development that optimises use of the river; and that the policy be reworded to provide a mix of uses including residential in both the North West of St Philip's Marsh and South of Albert Road areas.</p> <p>One respondent stated that the draft policy fails to acknowledge significant recycling industry, impact on local employment and future carbon neutrality. Concern was expressed by the implied displacement of vital local manual jobs by</p>	631, 811

Key Themes	Respondent References
commuter routes.	
Feeder canal <i>Comments neither in support nor objection (1):</i> One respondent stated that the policy needs to be clarified in relation to the areas identified within the policy area to account for land uses specific to each place, as north west St Philip's Marsh and South of Albert Road could both be interpreted as the same area. It was suggested that development from Feeder Road along the length of Albert Road is identified as a location appropriate for mixed-use development that optimises use of the river; and that the policy be reworded to provide a mix of uses including residential in both the North West of St Philip's Marsh and South of Albert Road areas.	631
Eastern St. Philip's Marsh <i>Comments neither in support nor objection (2):</i> One respondent stated that the policy is not clear about what areas constitute 'Eastern St Philip's Marsh' and 'Central St Philip's Marsh' and requested that the Council engages with Marsh Maker Forum on this issue. Policy wording in relation to the eastern area of St Philip's Marsh is requested to be amended by one respondent, who stated that it should be clarified whether there would be a presumption against residential-only planning applications in this location.	811, 817
Infrastructure and Transport <i>Comments neither in support nor objection (4):</i> One respondent highlighted the need for appropriate improved transport and community facilities alongside the delivery of development. The need for major commuter routes through the area to be effectively segregated from working/living communities and segregated from each other was raised by one respondent. One respondent stated that precaution should be applied to ensure the area does not degenerate into a commuter rat-run, as currently experienced at the southern edge of parkland adjacent to Newtown Estate. It was also noted that the policy omits the strategic resource of the electricity sub-station in the area which can accept power into the grid, where it was stated that this infrastructure should be preserved for use as a sustainable local power structure. One respondent stated that the existing road infrastructure in St Philip's Marsh primarily caters for heavy industrial vehicles, which therefore needs to be updated for pedestrians and cyclists. High-speed internet and new forms of sustainable energy will also be required for the area. Support was expressed for the associated benefits this policy will bring for existing businesses, supporting services and facilities and better transport connections. Details of supporting infrastructure, quantity and their location were requested to be listed within the policy, alongside clarity of how the sites would be connected to high quality public realm or green infrastructure. Two respondents made reference to the local value of Sparke Evans Park, and its importance for future development and existing communities within the Growth Area. It was expressed that it will be important to deliver more public green space across the area; however, without any obvious central publicly-owned site for this to come forward the onus will be on developers to deliver meaningful levels within individual sites in accordance with the masterplan.	807, 811, 817, 963

Key Themes	Respondent References
One respondent stated that the bus service will need improving along Feeder Road to Kingswood, Brislington and the City Centre. It was suggested that a towpath walkway/harbourside route next to the waterfront, with separate cycle routes, would be supported.	
<p>Flood Risk</p> <p><i>Comments in objection (1):</i> One respondent noted that this area is within a location affected by higher flood risk zone; it was stated that proposed development would require appropriate mitigation to ensure that the risk of flooding is appropriately addressed and does not add to flood risk elsewhere. This is the worst flood zone is the City.</p> <p><i>Comments neither in support nor objection (3):</i> All three comments addressed the requirement for a sequential test for development in this location. Two respondents expressed that the requirement to carry out a sequential test for development and the justification of use-type is unreasonable for developers, as this should have been undertaken at a Plan-level. It was requested that the Council make clear what assessments have taken place in this respect. Another respondent stated that the policy nor supporting text does not clarify how residential uses would pass the sequential text in this location.</p> <p>One respondent stated that strategic consideration needs to be given to the location of St Philip's Marsh within a high-risk flood zone, both in terms of planning and the funding of defences in coordination with private sector developments. It was also noted that St Philip's Marsh is an island containing contaminated and made ground. As the area has few access points, due to it being bound by the river, canal and railway infrastructure, it was suggested that new ways of opening the area will be key in connecting St Philip's Marsh to the rest of the city.</p>	603, 643, 817, 892, 964

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 10 Comments from statutory bodies and partnerships

Consultee	Respondent Reference
<p>Environment Agency (1): Overall, the EA emphasised that flood risk is a key consideration for development within St Philip's Marsh, where flood depths are projected to increase with climate change. It was commented that there is also a high risk of fluvial flooding in this area which is not mentioned and should be added to the supporting policy text. The policy text regarding flood risk was therefore not considered to not be strong enough. The EA stated that they cannot support this policy without sequential testing and a suitable flood risk management strategy.</p> <p>The application of the Sequential Test, if the majority of the area is in Flood Zone 3, was queried. It was stated that the production of a Flood Risk Assessment was required but will not necessarily overcome these issues. It was stated that flood risk needs to be considered strategically rather than on a site by site basis; and that flood risk needs to be addressed before development can come forward in</p>	964

this location. The EA stated that large scale on-site mitigation would increase flood risk elsewhere which is unacceptable; and that this should be addressed as part of an overall flood risk management strategy.

Support was expressed for the proposed approach for a multi-purpose greenway. It was commented that opportunities should be taken to incorporate green transport links into flood risk management infrastructure to provide multiple benefits to the area.

8. DS4: Western Harbour

Overview: In total, 34 respondents made 95 comments regarding policy DS4: Western Harbour. Key themes are identified below.

Table 11 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of development</p> <p><i>Comments in support (6):</i> Some respondents expressed general support for proposals to create a new Growth and Regeneration Area in this location. One respondent acknowledged the ambition of the proposals, noting the requirement for strategic planning to re-model the road network and release land for development. One respondent considered that the proposals would improve a currently underused asset of Bristol, the Avon Gorge area, for both residents and visitors.</p> <p>The inclusion of land south of New Cut was welcomed by one respondent as it was considered this would contribute to the regeneration of Western Harbour. The outlined 'place principles' for the Western Harbour were explicitly supported by one respondent.</p> <p>It was suggested that the policy should provide a positive justification for higher density development to unlock infrastructure improvements, housing delivery and the creation of a new city 'destination'. An amendment to the policy wording was also recommended, alongside a suggested site at Payne's Shipyard.</p> <p><i>Comments in objection (1):</i> One respondent provided an objection to draft policy DS4 and the Western Harbour concept, as the areas within Cumberland Basin and Hotwells are important part of the City's heritage and should therefore not be developed.</p> <p><i>Comments neither in support nor objection (12):</i> One respondent stated that the magnitude of proposed development under policy DS4 requires more debate and consultation as it is significant from a housing and transport point of view and will have a far-reaching impact upon the City. The requirement for proper consultation with the local community of Hotwells was raised by one respondent.</p> <p>Two respondents considered that the location of Western Harbour is not within the City Centre and was historically a gateway to the countryside of Ashton Meadows, Ashton Court Estate and the Avon Gorge; it was suggested that the area should therefore not be subject to the same development policies targeted towards the centre. It was suggested by one respondent that areas south of the floating harbour are an excellent site for sensitive development, potentially at higher heights, although not exceeding the repository buildings; however, another respondent cautioned the decision to intensively develop the area. It was stated that retail provision and growth in Western Harbour should be appropriate to the location and reflect a 'town centre first' principle protecting the Bristol Shopping Quarter as the main focus for retail.</p> <p>One respondent suggested that the Council produces a development framework</p>	<p>38, 50, 181, 196, 323, 446, 524, 603, 612, 619, 624, 737, 803, 811, 824, 829, 887, 891, 963</p>

Key Themes	Respondent References
<p>for Western Harbour, with reference made in comments to the landscaping objectives of the area by Dame Sylvia Crowe. A request was also made for phasing and expected timescales for development, to ensure sites are deliverable in immediate and medium term. It was stated that large scale infrastructure improvements should not adversely affect or prevent development in the surrounding area, such as the Ashton Gate Phase 2 scheme.</p> <p>One respondent requested the inclusion of food culture within DS4 development aspirations, to include food growing and community cooking facilities.</p> <p>It was noted that Site Allocation SA105 from the previously adopted Plan has since increased from 3.14ha to 600 homes; and that reference to retained BCAP policies throughout is inconsistent within the context of policy DS4. It was suggested that retained policies should be added through the policy text.</p>	
<p>Road infrastructure</p> <p><i>Comments in support (2):</i> One respondent expressed support for proposals to replace existing road infrastructure at Western Harbour on the basis that it is currently a car-dominated environment with negative impacts on liveability of the local area and setting of Clifton Suspension Bridge. It was suggested that changes to the Hotwells Road gyratory system ought to be considered as part of the proposals and this requirement should be made explicit within policy DS4.</p> <p>One respondent stated support for proposals to create a new Growth and Regeneration Area at Western Harbour. Clarity in relation to the timescale and process for masterplanning of Western Harbour, including of the reconfigured road system, was requested. It was commented that it is essential that any development at Western Harbour does not prejudice the delivery of new development at City Gateway, which will come forward within the next 5 years; a suggested amendment to policy wording was requested to reflect this adjacent area.</p> <p><i>Comments in objection (2):</i> One comment referred to potential options for road configuration, with objection to those impacting historic assets. One respondent stated that there is a need to further consider requirements for new transport infrastructure to retain strategic and local connectivity, as well as cycle provision. It stated that any road reconfiguration needs to be supported by detailed studies set within wider Bristol and West of England Transport Plans and City Centre movement strategy, to include implications on North Somerset Council.</p> <p>One respondent considers the current road system to be adequate and considered that increased housing in the area would pressure this system, while being unable to deliver road improvements; the costing for different options was requested. It was also commented by one respondent that tall boats must be accommodated in any new system without adversely disrupting traffic flow. The principles behind the approach outlined in policy DS4 were considered to be too vague - the benefits of 'do nothing' should be seriously considered. It was stated that until the wider public have consultation on options, general support for the replacement of the highway network cannot be implied.</p>	<p>19, 50, 446, 524, 603, 636</p>

Key Themes	Respondent References
<p><i>Comments neither in support nor objection (2):</i> One respondent suggested that replacing existing infrastructure, and the disruption this would bring, may be premature, given that growth in car use is likely to start reversing and a climate emergency has been widely recognised. One respondent stated that it is difficult make any detailed comment in the absence of the proposals for a reconfigured road scheme. It will be necessary to update the Local Plan again when the results of the consultation on the road system have been published.</p>	
<p>Housing</p> <p><i>Comments in support (2):</i> Both respondents stated support for mixed-use housing and the delivery of a new city quarter at the Western Harbour to deliver a mixed and inclusive community. One respondent expressed support for the proposal to provide 500 student bedspaces in this location.</p> <p><i>Comments in objection (2):</i> One respondent objected to the requirement for housing proposals in Growth Areas to provide employment as part of their scheme (where they are replacing an employment unit no longer in use), as this could risk undermining the priority of maximising housing delivery. One respondent objected to the number of houses proposed, as it was considered that this quantity would alter the character of the area and that infrastructure (including a reconfigured road system) would be unable to support the scale of proposed development.</p> <p><i>Comments neither in support nor objection (7):</i> Some comments considered that the north side of the Floating Harbour would be better suited to low-rise housing development (e.g. 3 storeys), while mid-rise housing would be better suited to the south, although not exceeding the height of the repository buildings, which could themselves be suited to conversion for affordable or social housing. Wapping Wharf was referenced as a good precedent for this type of development.</p> <p>Some respondents considered that housing development in this location would benefit wealthy foreign investors and second home owners, rather than the wider population of Bristol, due to desirable location and costs associated with development such as infrastructure and addressing flood risk. Concern was expressed by one respondent around the provision of affordable housing through development, particularly given costs of the infrastructure needed that are considered to be outside of the scope of Council funding. It was suggested that the Council priority should be to construct sufficient affordable homes and increase housing stock under its own control in order to safeguard the delivery of affordable housing.</p> <p>One respondent requested that the approximate number of dwellings that could be contained in Warehouse A should be provided to aid understanding of the scale of development. Some comments considered the scale of growth and minimum density to be inappropriate for a location outside the city centre and within the City Docks Conservation Area. It was suggested that housing mix needs to be a consideration, including the current surplus of one-bedroom flats. One comment raised concern over the inclusion of the existing caravan site within DS4.</p>	<p>181, 243, 260, 446, 603, 636, 842, 887, 888, 904, 963</p>

Key Themes	Respondent References
Clarity on the capacity of the area for housing was requested, given the lack of detail over road reconfiguration and land release. It was suggested by one respondent that Western Harbour should include a specific allocation of plots for community-led housing, such as 10% of new residential development.	
<p>Employment uses</p> <p><i>Comments neither in support nor objection (4):</i> One respondent stated general support of retaining protection and safeguarding for maritime industries within the area, considering that. Coronation Road, Underfall Yard and the Marina should be protected as there is a city-wide shortage of light industrial space. It was suggested that the 'agent of change' should apply to any future residential to protect future industries. Access was stated as a challenge for the Docks employees, particularly if the roads are reconfigured. Concern was also raised about the Ware's Tannery being included within the area of focus given its historical significance and success in export and international trade. It was commented that there is need for the Plan to recognise that this is not a failing industry.</p> <p>One respondent raised concern over potential gentrification of the area through high-value development which could displace traditional or blue-collar employment. One respondent requested the removal of workspace from policy wording, as BCC have identified employment areas to be given greater protection from change of use. It was stated that employment areas outside of these should not be subject to this policy requirement which risks them being unviable for development.</p> <p>Mixed use development, to include offices as well as retail, tourism and housing, was suggested by one respondent.</p>	603, 844, 888, 963
<p>Student accommodation</p> <p><i>Comments in objection (1):</i> One respondent objected to inclusion of additional student accommodation within the draft policy, as it was considered that the current quantity of student bed spaces is too high.</p> <p><i>Comments neither in support nor objection (2):</i> One respondent suggested that a hotel use, as opposed to student accommodation, should be considered as part of future development within this growth area. General concern was also raised by one respondent about the current concentration of student accommodation within this locality.</p>	38, 603, 811
<p>Leisure and community uses</p> <p><i>Comments neither in support nor objection (6):</i> One respondent suggested an amendment to policy wording to include the provision that 'retail and leisure development' should also cater for wider Bristol use and visitors, not just residents of the proposed new quarter. Comments stated that proposals should not harmfully impact the Bristol balloon fiesta or the route of the Harbour Railway, as these are a popular tourist attraction. One respondent also suggested the inclusion of a caravan park in the harbour area.</p> <p>Comments considered there is insufficient focus on tourism and leisure in the plan, including water-based sports, the cycle bump track and youth activities at Avonquay while BCAP9 <i>Cultural and Tourist Facilities</i> policy is not retained in the</p>	38, 446, 603, 636, 731, 963

Key Themes	Respondent References
<p>Plan.</p> <p>Support was stated by some respondents for the commitment of adequate community facilities as part of future development proposals.</p>	
<p>Open space</p> <p><i>Comments in objection (1):</i> One respondent commented that while recognising the potential for enhanced pedestrian and cycle access to the south of the river through new development, they object to the removal of green space south of the river.</p> <p><i>Comments neither in support nor objection (9):</i> Comments raised concern about the removal of green space in the area to enable development, with it considered by some respondents that the area is already deficient in green space and parks. It was noted that the need to keep a hectare of green space around Cumberland Basin, as mentioned in the Parks and Green Spaces Strategy is omitted from the policy. Respondents commented that parcels of this area should be designated as LGS or ROS (including Ashton Meadows and areas south of the CREATE centre and west of Riverside Garden centre) and that the impact on these spaces of any proposed development or changes should then be fully considered when proposals are brought forward.</p> <p>Two respondents specifically addressed the open space of Ashton Meadows, where concerns were raised that the space had not been granted any formal protection within the Plan, with it suggested that it should be LGS. It was stated that this space has been incorporated into the policy area since the previous consultation and therefore was not consulted upon in 2018. One respondent noted that the proposed development growth area does not include the White City Allotments opposite the CREATE centre as this would prevent the local food production and negatively impact air quality and recreational value.</p> <p>It was suggested by one respondent that the proximity to Ashton Court Park should be acknowledged in the policy, while another respondent considered that the City Docks Conservation Area a major asset for all Bristolians and visitors. Concern was raised that high quality public spaces should cater to a variety of visitors and users and that it may be difficult to enjoy water sports and culture in the Cumberland Basin because the green space area would be heavily developed with housing.</p>	<p>38, 217, 286, 446, 603, 607, 636, 731, 803, 804</p>
<p>Environment and ecology:</p> <p><i>Comments neither in support nor objection (3):</i> One respondent provided a general comment that the ground infrastructure adjacent to the Growth and Regeneration Area is 'made land' with land stability issues.</p> <p>One respondent noted that the Local Green Space document does not indicate the retention of open space within the area. It was insisted that there should be no loss of green space within the area and that development leaves green or shared spaces for people to enjoy. It was acknowledged by one respondent that open space has not been designated due to proposed changes to the highway layout, however, commented that it would be expected to be designated as Local Green Space when the plans for the area are finalised. It was suggested that this</p>	<p>603, 612, 624</p>

Key Themes	Respondent References
<p>point is made clear within the policy and/or supporting text.</p> <p>The inclusion of Brunel Way for development was considered unacceptable by one respondent, as this was considered to provide green lungs to the city. One respondent suggested that protection should be offered to open space around the Basin itself. One respondent stated that riverside open spaces exhibit all of the requisite criteria for a Local Green Space and are of considerable local significance to the existing and expanding populations of Hotwells, Southville and Bedminster, and there is limited other Local Green Space in the vicinity. One respondent made specific reference to White City Allotments, the Avon New Cut Local Nature Reserve, open space around the Cumberland Basin and space adjacent to Brunel Way, and suggested that these must be taken into consideration, protected and enhanced as part of future development.</p>	
<p>Walking and cycling</p> <p><i>Comments in support (1):</i> Support was provided for inclusion of retained policy BCAP 32 in relation to harbour walkways and quays.</p> <p><i>Comments neither in support nor objection (3):</i> It was noted by one respondent that the policy or supporting text makes no mention of retaining or relocating the cycle bump track on the south side of the river. One respondent suggested that it would be good to enable the Grade II* Listed Swing Bridge to work over the lock again to support accessibility across the lock infrastructure.</p> <p>Concern was expressed by one respondent that supporting text should reflect that Western Harbour is the only point of access to the Avon Gorge, by foot, for leisure. It was suggested that the policy needs to reflect how the Western Harbour can be shaped to make the most of its geographical position. It was suggested that the area should be able to accommodate pedestrian footfall growth associated with Ashton Gate stadium. Suggested amendments to policy and supporting text, to include that walking and cycling routes should specifically include references to the Avon Gorge, Ashton Court and Ashton Gate.</p>	<p>38, 603, 731, 963</p>
<p>Historic Environment</p> <p><i>Comments neither in support nor objection (10):</i> General comments were made by some respondents that any designs need to be in keeping with the conservation area, Avon Gorge, and listed buildings; and that overall, the historic landscape and heritage of area must be protected through design; one respondent added that this includes not permitting the development of tall buildings.</p> <p>Specific comments were made in relation to the following:</p> <ul style="list-style-type: none"> • North Bank development: One respondent requested that any proposed development specifically on the north bank of the Cumberland Basin is in keeping with the local heritage architecture of Hotwells. It was commented that no new building north of the floating harbour should be over 3-storeys; all buildings must be in harmony with the surrounding existing buildings such as Doury Parade. • Building heights and the protection of existing heritage assets: One respondent stated that through experience of discussions with BCC on Payne's Shipyard site, BCC should be aware that development of the scale set out in the policy will require a degree of compromise in relation to protection 	<p>181, 243, 260, 603, 619, 636, 731, 824, 956, 963</p>

Key Themes	Respondent References
<p>of existing heritage assets, notably land adjacent to Bonded Warehouses and Underfall Yard.</p> <ul style="list-style-type: none"> Impact on views: <ul style="list-style-type: none"> The safeguarding of existing protected views (particularly iconic views of the Suspension Bridge, Avon Gorge, Cumberland Basin and Clifton) was supported by several respondents, where it was stated as important that the height of development does not cause adverse effect. It was noted by some respondents that the policy text makes limited mention of the views of the Gorge and the Suspension Bridge, or views of the existing warehouses and the green land beyond in Ashton Court, which are argued to also be of great importance to many, including those who use the Harbourside for leisure; reference was made to the Clifton and Hotwells Character Appraisal, which includes these key views. One respondent stated that the scale and design should relate to the key views and landmarks, rather than being appropriate to the City Centre location. It was suggested that the Bond Warehouses and Repository Buildings are retained for housing and need to be mentioned within the policy. It was suggested by one respondent as necessary to utilise low-rise, varied architecture, with a need to preserve existing retail and leisure uses as part of future development, where these exist. Landscaping: One respondent suggested that the policy should make clear that heritage assets also include the landscaping work of Dame Sylvia Crowe. <p>It was suggested by one respondent that retained policies relating to historic environment should be incorporated into the policy and/or supporting text; and that this must reference Section 66 and Section 72 of the Planning and Listed Building Act, alongside relevant sections of the NPPF. One respondent stated that reference to BCAP41 should have been retained, and that there is need to consider a policy focussing on tourism development in the Harbourside area.</p>	
<p>Flood risk</p> <p><i>Comments in objection (1):</i> Objection was made to the installation of high-cost flood defence measures, which were considered to incur high environmental damage and would necessitate the development to be sold at a premium. It was stated that development, including along the New Cut, would be dependent on mitigating the regular flooding of the area. Strong objection was raised to any potential damming of the Avon.</p> <p><i>Comments neither in support nor objection (1):</i> One respondent commented that retained policies BCS16 and BCAP5 should be referred to and added to the retained policy list for this area.</p> <p>It was stated that tidal flood risk and sea level rise is a huge concern for proposed development, and therefore that development should only take place after extensive mitigation measures have been put in place, and sites at risk of flooding should only be developed where these are supported by a sequential test or FRA, as there have been extensive floods at Cumberland Basin.</p>	181, 603, 964

Key Themes	Respondent References
<p>Design principles</p> <p><i>Comments neither in support nor objection (5):</i> Comments generally considered the proposals to be vague at present, including a lack of clarity on the boundary for development and on how a cohesive design will be delivered, particularly if land were to be divided. Detail and information on 'place principles' of Western Harbour were requested by one respondent, and an urban design framework. It was suggested that defining character is carried out in the same way as St Philip's Marsh policy DS3, to include identification of appropriate height and/or density ranges.</p> <p>One respondent expressed support for scale and design appropriate to a City Centre location and through responding appropriately to key views and landmarks. One respondent commented that the Bonds buildings are striking, and it is not clear in the policy or supporting text whether their height/scale is being proposed as a reference point for further buildings, although one respondent stated that new development should be subservient to them.</p> <p>It was stated that creating a "curtain wall" of buildings around the harbour would destroy any historic character.</p>	<p>446, 603, 619, 636, 824</p>
<p>Tall Buildings</p> <p><i>Comments in objection (2):</i> Comments objected to the principle of tall buildings in this location and stated that tall buildings in Western Harbour would not be appropriate, and should be over 3 storeys, due to unacceptable impact on views of the Avon Gorge. It was stated that proposals should have regard to the areas' important heritage assets, be no higher than development at Wapping Wharf, and subservient to the tobacco bond houses.</p> <p><i>Comments neither in support nor objection (7):</i></p> <ul style="list-style-type: none"> • Impact on Views: Some respondents stated that if tall buildings are permitted as part of future development, it would decimate the views of the Suspension Bridge, the tobacco warehouses, the countryside beyond and the harbour walkway from SS Great Britain and Brunel Quay. Concern over the setting and character of the historic environment was stated. Requested amendment to policy and supporting text was proposed to state that views from the Harbourside would be maintained, as these are enjoyed by many visitors. • It was requested that BCC think very seriously about permitting any plans to build higher than 5 storeys and suggested that building heights should be limited to 3 storeys. One respondent stated that there is too much space for ambiguity in relation to the location of the development. One respondent stated significant tower developments in this area would fail to meet objectives of policy DC3 to preserve local character, distinctiveness and scale. • One respondent commented that there was a strong need to preserve open space and suggested low rise-buildings which would enable the Bond warehouse buildings to retain their scale. It was commented that the character of the area contributes to attractiveness as a tourist and business destination; and that the impact of the proposed development on this is not considered in enough detail within the Plan. 	<p>181, 243, 260, 286, 446, 603, 612, 624, 731</p>

Key Themes	Respondent References
<p>Public transport</p> <p><i>Comments neither in support nor objection (2):</i> One respondent stated that the Local Plan should explicitly state that development proposals should enable direct bus/MetroBus connectivity from the Ashton Avenue Bridge through the Western Harbour area via the Junction Lock Bridge to Hotwell Road, as this would enable a wider range of services to benefit from the investment in the Metrobus corridor and improve connectivity not just to Western Harbour but also neighbouring areas in South West Bristol. It was suggested that this provision should be an early part of any development plan and predate any major highway, since it would provide an alternative for buses currently using the Brunel Way, Plimsoll Bridge main highway route. It was stated that it would also help avoid bus delays when the necessary major maintenance or demolition works on this highway corridor are undertaken.</p> <p>One respondent stated that proposals need to improve public transport access using the MetroBus or light rail to the Airport. It was commented that Ashton Gate station will also improve access to the Western Harbour. It was noted that there is no mention of light rail or bus priority measures on Hotwells Road in the Plan; and suggested that the proposed development policy should include a ferry terminal to improve river crossing points.</p>	829, 963

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 12 Comments from statutory bodies and partnerships

Consultee	Respondent Reference
<p>Historic England (1): Historic England considered it important that specific evidence is gathered and applied, including views analysis, to demonstrate how strategic form and capacity assumptions have been established as a positive response to the significance of the historic entrance to the City. Specific reference was made to the confluence of Floating Harbour and New Cut, and the backdrop of Clifton slopes, Avon Gorge, Suspension Bridge and Ashton Court. Due to considerable sensitivity and significance, Historic England stated that they would be available to help inform developing ideas and shape best practice place making in the future.</p>	956
<p>Environment Agency (1): The EA noted that flood risk is a key consideration for many parts of Bristol City Centre in particular Western Harbour. Overall, it was suggested that Flood risk needs to be addressed in a strategic manner before development can come forward in this location. It was stated that large scale on-site mitigation would increase flood risk elsewhere which is unacceptable; and that this could be addressed as part of an overall flood risk management strategy.</p> <p>Specific comments were made in relation to the proposals for development over the Longmoor Tunnel and Longmoor Tunnel outfall as well as Colliters culvert and outfall, designated Main Rivers; it was confirmed that the EA cannot allow development over these culverts, that development should be set back 8 metres from the edge of the culvert, and maintenance access will need to be safeguarded. It was advised that land must be safeguarded to facilitate flood risk management works, including space for lock gate replacement.</p>	964

Consultee	Respondent Reference
<p>It was considered that the policy text regarding flood risk is not strong enough; and that the majority of this area is not suitable for development without a flood risk management strategy that will ensure that development is safe for its intended lifetime of 100 years, without increasing flood risk elsewhere. It was noted, in line with the NPPF, the Sequential and Exception tests will need be applied, which should steer development away from areas at highest risk of flooding and incorporate mitigation to manage the remaining risk without increasing flood risk elsewhere. It was stated that production of a Flood Risk Assessment is required but will not necessarily overcome these issues; and that flood risk needs to be considered strategically rather than on a site by site basis.</p>	

9. DS5: Frome Gateway

Overview: In total, 19 respondents made 32 comments regarding policy DS5: Frome Gateway. Key themes are identified in the table below.

Table 13 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of development</p> <p><i>Comments in support (2):</i> Support for the policy guided by a spatial framework was stated by two respondents, with one comment stating that there would need to be more clarity in the policy on the role of the spatial framework and the evidence base for it. A suggested amended policy text was provided to include this.</p> <p><i>Comments neither in support nor objection (7):</i> One comment stated that development should be supported by a detailed masterplan and this should be explicit in the policy text. A request was also made for more detail on phasing in the policy alongside the publication of a spatial framework, to ensure best chance of delivery of the vision and an inclusive development. It was suggested that existing policies BCAP13 to BCAP19, DM7 to DM11 should be referred to in the policy text.</p> <p>It was suggested that improvements to the J3 underpass and surface water flooding capacity is included in any development. A request was also made for the inclusion of food culture in the policy, such as provision of community food growing facilities and community cooking.</p> <p>In relation to employment, one comment stated that that the policy needs to provide realistic opportunities for a range of employment and workspaces to be retained, consolidated and expanded. A comment relating to retail raised concern that retail and leisure uses in this area might potentially undermine Bristol Shopping Quarter, which should remain the primary focus of retail in city centre.</p> <p>Specifically referring to the Newfoundland Road area, a comment was made that the development in this location should be mixed use, with employment land, office space and tourism (hotels), with the plans developed alongside those for Broadmead.</p>	48, 196, 603, 612, 647, 811, 817, 891, 963
<p>Housing</p> <p><i>Comments in support (3):</i> One respondent in support of the housing figures suggested they could be higher, at 1,500 homes, with capacity further established through the Spatial Framework. One comment stated that the housing figures should be an absolute minimum and that the policy should recognise that some housing types won't suit urban living or maximising of density, such as family housing. A recognition that smaller developments may not be able to deliver all requirements of the policy was requested. The support for 500 student beds was stated by one respondent.</p> <p><i>Comments in objection (2):</i> One comment objected to the expression of housing figures as a minimum and that the policy does not provide a specified site-based quantity. One objection to the requirement for some workspace to be provided in</p>	603, 647, 807, 811, 842, 852, 887, 888, 904

Key Themes	Respondent References
<p>schemes which are replacing an employment unit no longer in use, which it is considered would undermine the priority of maximising housing delivery.</p> <p><i>Comments neither in support nor objection (4):</i> Two comments referred to the need for affordable homes and social housing to be delivered in this area and stated in the policy, while two other comments stated that the area should be allocated for community-led housing.</p>	
<p>Employment</p> <p><i>Comments neither in support nor objection (3):</i> Comments raised concern over the loss of manual, low-paid jobs in the area which serve local people, and which may be displaced to locations requiring costly and long travel. Concern was raised that new employment development would benefit foreign and offshore investors and result in gentrification. A lack of reference in the policy to existing employment was raised as a concern by one respondent.</p> <p>Another comment stated that the policy should remove the requirement to provide workspace as part of development as other policies in the Local Plan Review identify employment areas and it risks development being unviable.</p>	811, 844, 888
<p>Student accommodation</p> <p><i>Comments neither in support nor objection (2):</i> One comment raised concern about the proposals for student accommodation in the area given the need for family homes. Another comment suggested that the boundary of the policy area should be amended to reduce from the north east and extend further to the south west, where student accommodation would be closer to the centre and more suited with better access to infrastructure, such as Metrobus. The comment also suggested that this policy, which covers a primarily commercial area, is at odds with the requirement of student housing not to impact harmfully on commercial uses.</p>	807, 875
<p>Infrastructure and Transport</p> <p><i>Comments in support (1):</i> One comment in support stated that key infrastructure is an essential consideration of viability and the delivery strategy. It stated that the provision of new crossings over Newfoundland Way and the River Frome, enhanced crossing over Newfoundland Way, pedestrian and cycle link connections and enhancement to the River Frome, are all expected as part of a proposed development. Reference was made to work that can be undertaken to identify where it may be suitable for strategic infrastructure connections to be funded at a strategic level rather than through individual development proposals</p> <p><i>Comments neither in support nor objection (2):</i> One comment stated that the impact of new cycling and commuter routes must be mitigated. Another comment stated that existing policy BCAP32 should be applied in this area regarding waterside walkways. It also stated that provision needs to be made at Cabot Circus car park for an intercity and international coach station and parking, as part of Broadmead redevelopment.</p>	647, 811, 963
<p>Flood risk</p> <p><i>Comments in objection (1):</i> One comment was concerned with the flood risk in the area and impacts on development.</p>	603, 964

Key Themes	Respondent References
<p>Green infrastructure</p> <p><i>Comments in support (1):</i> One comment expressed support for the improvement of the riverside park and Peel Street green space.</p> <p><i>Comments neither in support nor objection (2):</i> One comment stated that no green space should be lost through development and public rights of way should be maintained. Another comment raised significant concern about loss of key wildlife corridors and green space through development of 1,000 homes, particularly given proximity to M32 and existing air quality issues. A suggestion was made for systematic tree planting (2 for any displaced).</p>	807, 894, 963
<p>Historic Environment</p> <p><i>Comments neither in support nor objection (1):</i> One comment stated that housing designs near Newfoundland Road need to be in keeping with the Georgian buildings of St Pauls and Portland Square and Brunswick Square Conservation Area. It stated that tall buildings should not overshadow the Conservation Area.</p>	963

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 14 Comments from statutory bodies and partnerships

Consultee	Respondent Reference
<p>Environment Agency (1): Comment that before development comes forward in Frome Gateway, EA would need to be consulted strategic approach or framework that addressed a sequential layout of development.</p> <p>Note that sequential layout is not mentioned. Comment that development should be located in Flood Zone 1 wherever possible, making space for flood water and improving the amenity of the riverside location. Support production of a framework for the area and this should be put in place as soon as possible to help guide development in the area.</p>	Ref 964

10. Section 4.2: East Bristol

Overview: In total, 4 respondents made 5 comments regarding development in East Bristol. Key themes, including the proportion of support, object or neutral are identified in the table below.

Table 15 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General Principle of Development:</p> <p><i>Comments in support (1):</i> One comment was supportive of the growth agenda set out in paragraphs 4.2.1 to 4.2.4.</p> <p><i>Comments neither in support nor objection (3):</i> One comment set out that there should be more explicit recognition in the Plan of inequality in Bristol and a recognition of the perception that some areas receive lesser quality development, such as Lawrence Hill and Easton. This expressed general concern about gentrification of East Bristol was made, including increased parking pressures requiring local residents to pay for parking.</p> <p>Two comments made reference to transport infrastructure improvements required in East Bristol, such as improving accessibility and facilities at Stapleton Road and Lawrence Hill stations, protection of the Bristol and Bath rail line for light rail, the use and improvement of Barrow Road rail freight facilities and the need to reduce traffic on arterial routes such as Church Road, Fishponds Road, Stapleton Road. It was stated that there is a need for transport infrastructure to be improved before any extensive development.</p>	491, 807, 894, 963
<p>Housing numbers:</p> <p><i>Comments in support (1):</i> One comment was supportive of the minimum figure of 5,000 new homes.</p>	491

11. DS6: Lawrence Hill

Overview: In total, 14 respondents made 23 comments regarding policy DS6: Lawrence Hill. Key themes are identified in the table below.

Table 16 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of development</p> <p><i>Comments in support (2):</i> One comment expressed support for development at this location due to sustainability of its location through facilities such as the Lawrence Hill train station and Bristol-to-Bath Cycle path. However, the comment states that more emphasis and a stronger commitment was required on reconfiguration of the Lawrence Hill roundabout which currently causes severance. Suggestion that this could also include reconfiguration of the Old Market gyratory. One comment expressed general support for improvements to Lawrence Hill and Stapleton Road train stations as part of the policy.</p> <p><i>Comments neither in support nor objection (5):</i> Two comments stated the need for a Council-led rather than developer-led masterplan for the area. One comment set out concerns that as a deprived area, Lawrence Hill could be vulnerable to poor quality development of a type not acceptable in other areas and could be 'dumped on' with such development. It also raised concern of existing air quality issues which may be made worse through development.</p> <p>One request was made for the inclusion of urban food growing in policy aspirations and public realm improvements while another requested that connections to the Dings cycle path is improved. A suggestion was made that Lawrence Hill roundabout be used as open space.</p>	19, 48, 196, 401, 612, 807, 811
<p>Housing</p> <p><i>Comments in objection (2):</i> One comment objected to the lack of explicit reference to delivery of social housing, council housing and housing which is affordable for local people. The need for explicit targets in the policy for this type of housing was stated, as was the need for family homes.</p> <p>One objection to the requirement for some workspace to be provided in schemes which are replacing an employment unit no longer in use, which it is considered would undermine the priority of maximising housing delivery.</p> <p><i>Comments neither in support nor objection (6):</i> Comments stated concern over the type of housing to be delivered such as high density and high rise beyond means of local people, which could polarise community and negatively affect cohesion. Concern about gentrification of the area was raised and it was stated that the area should not be considered part of the City Centre but as part of the community with St Philip's Marsh, Easton, Barton Hill and Redfield. Concern that overcrowding is already bad in the area.</p> <p>Suggestions were made that Community Led Housing could be delivered in Lawrence Hill, as 10% of housing. A suggestion was made to build housing over the rail tracks as part of a station remodel.</p>	807, 811, 842, 888, 889, 894, 904, 963

Key Themes	Respondent References
One concern was raised over the impact of residential development near to the Lawrence Hill bus depot, which due to its operations, is not well suited to close proximity to residential uses. In particular, the respondent stated concern about paragraph 4.2.10 and that there is no plan at First Bus to relocate the depot. It was requested that retention of the depot is explicitly stated as an aim of the policy.	
Employment <i>Comments neither in support nor objection (2):</i> One comment stated the need to retain the First Group Bus Maintenance Depot, Department for Transport offices, South West Ambulance and the industrial estate in Lawrence Hill. Support was stated for shopping centre improvements on Church Road Another comment stated that the policy should remove the requirement to provide workspace as part of development as other policies in the Local Plan Review identify employment areas and it risks development being unviable.	610, 888, 963
Tall buildings <i>Comments in support (1):</i> One comment stated support for the approach of tall buildings in this area, which it considers should apply to all of East Bristol. <i>Comments in objection (1):</i> One comment stated objection to tall buildings in the area, except immediately adjacent to the station.	48, 491, 610
Infrastructure and Transport <i>Comments neither in support nor objection (4)</i> One comment raised concern over existing pressures on services and infrastructure and stated the need to provide improvements alongside development, particularly in relation to sustainable travel and connectivity. The need for full disabled access to Lawrence Hill and Stapleton Road stations was raised, as was the need for the Bristol-Bath Railway Path to be made safer for children. A suggestion was made that the land around the roundabout should be redeveloped and remodelling to make a T junction, with bus priority measures and walking, cycling and public realm improvements.	807, 811, 894, 963

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 17 Comments from statutory bodies and partnerships

Consultee	Respondent Reference
South Gloucestershire (1) One comment considered that in relation to tall buildings, that there should be consideration of the visual impact on views within South Gloucestershire.	Ref 610

12. DS7: Central Fishponds

Overview: In total, 12 respondents made 18 comments regarding policy DS7: Central Fishponds. Key themes are identified in the table below.

Table 18 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of development</p> <p><i>Comments in support (1)</i> One comment states support for housing and workspace development in central Fishponds provided it is sustainable and an improvement to area.</p> <p><i>Comments neither in support nor objection (3):</i> One comment stated the need for a Council-led masterplan for the area. One comment stated that the Central Fishponds area already includes significant existing site allocations and cleared sites and that this provides significant potential to exceed the 1,500 dwellings proposed by the policy. It is suggested that the policy is amended to reflect development potential of Goodneston Road area, which could be a site-specific policy allocation. It suggests that the policy text should provide for at least 2,500 homes and a density of up to 200dph, where appropriate and if delivering good quality urban design.</p>	48, 196, 797, 839
<p>Housing</p> <p><i>Comments in support (1):</i> One comment expressed general support for new housing in Fishponds.</p> <p><i>Comments in objection (3):</i> Two comments stated objections to new housing development due to increased pressure on local services, disruption and noise to local residents and traffic and congestion impacts particularly at Station Road, Filwood Road bridge, Hockey's Lane. One objection to the requirement for some workspace to be provided in schemes which are replacing an employment unit no longer in use, which it is considered would undermine the priority of maximising housing delivery.</p> <p><i>Comments neither in support nor objection (2):</i> Two comments suggested that Community Led Housing could be delivered in Lawrence Hill, as 10% of housing.</p>	12, 202, 842, 888, 904, 963
<p>Employment</p> <p><i>Comments in support (1):</i> One comment supported regeneration of shops and local employment sites in Fishponds.</p> <p><i>Comments neither in support nor objection (2):</i> One comment stated that the Council should engage with employers in the area to avoid unintended consequences of development which could harm business viability such as congestion. Another comment stated that the policy should remove the requirement to provide workspace as part of development as other policies in the Local Plan Review identify employment areas and it risks development being unviable.</p>	610, 797, 888, 963

Key Themes	Respondent References
<p>Tall buildings</p> <p><i>Comments in objection (2):</i> Two comments objected to the principle of tall buildings in Fishponds on the basis of the higher density development they would deliver and resulting impacts on traffic congestion; one comment suggested rapid mass-transit to the centre would be required before any tall buildings are built.</p> <p><i>Comments neither in support nor objection (1):</i> One comment stated the need for a co-ordinated masterplan to include designated land for tall buildings.</p>	12, 48, 610, 612
<p>Infrastructure and Transport</p> <p><i>Comments neither in support nor objection (1):</i> One comment stated that Fishpond Road needs bus priority measures to Staple Hill, Downend, Yate and Emersons Green and the restoration of bus services to Lodge Causeway. It also states that protection of Midland Rail Line Transport corridor is required for cycling, walking, light rail and that public toilets at Fishponds Park should be retained.</p>	632, 963

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 19 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Highways England (1): Comment that is noted that the approach to parking policy is specifically mentioned in the Lawrence Hill policy, but not the Central Fishponds policy. Highways England are concerned about the locational flexibility offered by the 'Urban Living' allocation in the JSP, and the lack of detail regarding how the use of the car will be effectively discouraged in favour of other modes of transport.</p>	Ref 632
<p>South Gloucestershire (1) One comment considered that in relation to tall buildings, that there should be consideration of the visual impact on views within South Gloucestershire.</p>	Ref 610

13. Section 4.3: South Bristol

Overview: In total, 12 respondents made comments regarding development in South Bristol. Key themes, including the proportion of support, object or neutral are identified in the table below.

Table 20 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General Principle of Development:</p> <p><i>Comments in support (2):</i> Both respondents expressed support for the development strategy for the South Bristol area, including for the development of a minimum 11,000 dwellings. One respondent also supported the policy for southwest Bristol (Draft Policy DS11), noting that these figures may change as a result of the JSP Examination. One respondent considered that the Plan should make reference to existing allocations to be retained and signpost the listing of such sites, if in a separate document.</p> <p><i>Comments in objection (2):</i> One respondent stated that while Bristol is required to develop new homes, Bishopsworth, Bedminster Down and Uplands have taken a fair share of Bristol's development over the past few years. Concern was expressed that house sales have been slow on the market within these areas and the extent of current/future housing need within the area was questioned. It was suggested that West Bristol should contain more proposed development due to the presence of stronger employment areas in this location.</p> <p>One respondent stated that the proposed housing targets and significant population increase appears to have been made with minimal regard for providing for current and future employment and business creation needs.</p> <p>One respondent commented that there is insufficient employment Land within the boundary of South Bristol to address the north / south economic divide experienced within the City. It was suggested that an Employment Land Survey is undertaken for South Bristol. The following sites were referred to for consideration for employment land suitability: Hengrove Park; Hawkfield Meadow; Areas of The Mounds; Hartcliffe Way; alongside the provision of new slip road into Knowle West.</p> <p><i>Comments neither in support nor objection (8):</i> Two respondents noted the draft policy reference to warehousing and queried why warehousing jobs are to be located in South Bristol, as it is considered that these are not the high-skilled, quality jobs that are promoted in the Local Plan. Concern was expressed that this type of industry attracts more HGVs onto the overloaded road network and are better suited to Severnside where there are motorway links. It was suggested that future development in South Bristol should instead be connected to high-tech industries.</p> <p>One respondent stated that several developers making planning applications were considered to represent over-development of individual sites along Bath Road between Paintworks and Three Lamps junction. It was stated that these must be considered through a masterplan that includes commercial units, services, and a transport plan for this congested area that currently suffers from poor air quality. It was suggested that the height of buildings should be restricted because of the</p>	<p>228, 237, 316, 383, 751, 793, 829, 866, 871, 873, 890, 963</p>

Key Themes	Respondent References
<p>effect of creating a 'wall' of tower blocks that would obscure views of Totterdown's distinctive character.</p> <p>General concern was expressed by some respondents about the need to deliver adequate infrastructure to meet local needs across all development sites</p> <p>One respondent stated that there should be more recognition of the significant sporting role Ashton Gate Stadium plays within South Bristol.</p> <p>It was suggested by two respondents that the policy supporting text should include investment in the Metrobus corridor, with a specific comment raised by one respondent that this should focus the route between the City Centre and Ashton Vale.</p> <p>One respondent referred to the inclusion of Filwood Green Business Park in the supporting text for the provision of new work space and proposed that there should be emphasis on green businesses and jobs. It was suggested that the Council support or endorse industry that brings green jobs, supports local infrastructure development and contributes to circular economy practices.</p> <p>A request for a Greater South Bristol Regeneration Framework was made by one respondent.</p>	

14. DS8 Central Bedminster

Overview: In total, 29 respondents made 51 comments regarding policy DS8: Central Bedminster. Key themes are identified in the table below.

Table 21 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of development:</p> <p><i>Comments in support (9):</i> Comments in support covered the following elements:</p> <ul style="list-style-type: none"> Support for comprehensive development: One respondent stated that South Bristol should remain a priority focus for development and regeneration and commented that development proposals would be expected to demonstrate comprehensive or co-ordinated forms of development. The regeneration of East Street Shopping Centre was specifically supported by one respondent, whilst another stated that it was important for development proposals to recognise the existing diversity in land use in Bedminster, comprising a mix of residential, retail and light industry. Support for housing number: It was considered by some respondents that the overall focus toward housing in Central Bedminster was appropriate, given the City's housing crisis. Through support for the overall development strategy, BCC was encouraged by some respondents to ensure that policy BCS8 will be applied positively and proactively through the development management process to ensure the delivery of its overall development objectives. Intensification of uses: The intensification and redevelopment of Central Bedminster was supported by some respondents based on its sustainable location. The redevelopment of St Catherine's Place, which forms the retail and leisure core of the proposed Central Bedminster growth area, was supported by one respondent. Tall buildings: The policy approach to making efficient use of land was supported by some respondents, who agreed that tall buildings in the right setting could contribute towards the Plan's minimum housing requirement. One respondent encouraged the Council to ensure that policy related to intensification would be applied positively and proactively through the development management process. <p><i>Comments neither in support nor objection (8):</i></p> <ul style="list-style-type: none"> Coverage of the Growth and Regeneration Area: One respondent suggested that the area around Dame Emily Park should be included in the regeneration area; and stated that development could improve the setting and safety of the park and listed pool, which should be refurbished. Density: One respondent noted that Bedminster Green is now considered as part of the City Centre, with higher density per hectare figures applied; it was noted that this is not consistent amongst the Plan documents. One respondent raised concern about potential gentrification and commented that Bedminster should not be prioritised as an area close to the City Centre but as part of its own community, and that redevelopment should benefit these communities as a priority. Reference to the Spatial Framework: It was suggested by some respondents that the policy should refer to the adopted Bedminster Green Spatial Framework. 	<p>48, 56, 196, 446, 612, 620, 648, 656, 817, 821, 831, 851, 882, 891, 894, 923, 963</p>

<ul style="list-style-type: none"> • Land Use: The reference to retail and leisure uses was noted by one respondent, who stated that the Plan should reflect the 'town centres first' principle and protect established centres from harmful retail and investment impacts. It was suggested that retail provision and growth in this area should be of a scale and nature appropriate to its location. • Flood Risk: One respondent requested information as to how the policy relates to the site allocations and the subsequent implications for the flood risk Sequential Test. It was stated that greater clarity is needed about the Council's approach to sequential testing through the policy and/or the Council's Flood Risk Sequential Test Practice Note. • Mix of Uses: One respondent expressed support for the policy ambitions, however, considered that the policy wording was weak in providing realistic opportunities for a range of employment and workspaces. It was recommended that the policy wording is reviewed to place more controls on the nature and phasing of development proposals. • Food Growing: One respondent requested the inclusion of food culture within DS8 development aspirations, to include provision of food growing and community cooking facilities to support the residential and student development. 	
<p>Housing</p> <p><i>Comments in support (5):</i> Support was expressed by some respondents for the development of at least 2,500 homes with a range of sizes, types and tenures, as outlined by draft policy DS8. It was suggested by one respondent that the density of housing development at this location should be 120dph as a minimum, with 200dph or more, where appropriate. The provision of up to 1,000 purpose-built student bedspaces, to address the requirement for this specialist accommodation in this location, was supported by some respondents. One respondent considered that the number of proposed student bedspaces should be raised to 1,350, rather than 1,000 as currently drafted in the policy.</p> <p><i>Comments in objection (1):</i> Objection was raised to the requirement for housing proposals in Growth Areas to provide employment as part of their scheme where they are replacing an employment unit no longer in use, as this was considered to risk undermining the Local Plan's priority of maximising housing delivery.</p> <p><i>Comments neither in support nor objection (4):</i> One respondent considered that the indicative housing target of 2,500 could be significantly exceeded. It was commented that, with regard to housing mix, consideration should be given to likely occupiers of new housing in area. The area was stated to be particularly popular with younger age groups and first-time buyers, and it was suggested that a higher proportion of smaller units would enable these groups to access the housing market in an area currently predominantly made up of large family housing. One respondent stated that the policy does not go far enough in ensuring the right kind of accommodation is built in the area. It was suggested that this should be mandated within the policy to prevent an oversupply of units of any one type; and that this should reinforce the policy wording within policy H4.</p> <p>Whilst it was noted that there is no maximum density quoted, it was suggested that the policy include one for the area. Currently proposed schemes in the area were cited to exceed density requirements for this location.</p>	<p>620, 627, 821, 840, 842, 851, 887, 888, 904, 963</p>

<p>Two respondents suggested that Central Bedminster should include specific allocation of plots to community-led housing, as part of the wider mix of new housing proposed for the area. It was recommended that this type of housing should comprise a minimum 10% of new residential development.</p>	
<p>Employment <i>Comments neither in support nor objection (5):</i> One respondent considered that the current wording of this policy is too rigid and does not allow for the provision of employment land within Central Bedminster to be considered holistically. Overall, it was suggested that policy wording should be reviewed in light of a published Employment Land Strategy to provide evidence of the type and location of employment workspace required for growth. It was stated that without this evidence base, it is unclear whether there would be demand for employment to be retained on all current employment sites within Central Bedminster, particularly where the existing premises or site infrastructure do not suit current market conditions.</p> <p>One respondent supported the principle of housing development proposals which will incorporate high quality workspace. One respondent suggested the removal of 'workspace' from the policy wording, as BCC have identified employment areas to be given greater protection from change of use. It was commented that employment areas outside of these should not be subject to this policy requirement which risks them being unviable for development.</p> <p>Two respondents proposed amendments to policy and/or supporting text to provide clarity about the development expectations for new workspace as part of mixed-use development; one of whom suggested that this should be a requirement for sites only used for businesses within the last 2 years, and that new workspace should include use classes B1a-c and B8. Two respondents requested specific clarification in the policy as to what an appropriate form and amount of re-provided space should be. It was stated that the viability and demand for such commercial space in this location should be carefully considered; and it should not constrain the ability for housing to be delivered or lead to the over-provision of such workspace.</p>	<p>648, 821, 851, 871, 888</p>
<p>Student accommodation: <i>Comments in support (2):</i> Both respondents expressed support for the policy provision of 1,000 student bedspaces within the area. One respondent provided support on the basis of proximity to the University Campus as well as UWEs existing facilities at Bower Ashton.</p> <p><i>Comments neither in support nor objection (1):</i> One respondent acknowledged that, except for established HMOs, Central Bedminster will represent a new focus for student living in a part of the City that has gained the support of the University of Bristol as part of its expansion into areas south of the River Avon/Floating Harbour. It was stated that the area will therefore be an important part of purpose-build student accommodation (PBSA) and supporting facilities.</p> <p>It was recommended that the capacity/threshold for new student bed spaces should be increased to approx. 1,350, which would complement other policy objectives for the area whilst securing the positive benefits of introducing a resident student population.</p>	<p>620, 882, 923</p>

<p>Urban living</p> <p><i>Comments in support (3):</i> Respondents expressed support for the efficient use of land within the area under the urban living development strategy, including through development of tall buildings in the right setting. One respondent noted that Policy DS8 sets a high level of growth and redevelopment within Central Bedminster and commented that it is only through higher densities and taller buildings that this can be delivered. It was stated that this approach reflects the principles of the NPPF to achieve optimal densities of development and would be expected to align with national policy guidance.</p> <p><i>Comments neither in support nor objection (1):</i> One respondent stated that it is important to maintain the uniqueness of Bedminster in its urban context, including its mix of residential and previous industrial buildings.</p>	<p>56, 620, 648, 851</p>
<p>Tall buildings</p> <p><i>Comments in support (4):</i> Two respondents noted that Policy DS8 sets a high level of growth and redevelopment within in Central Bedminster and commented that it is only through higher densities and taller buildings that this can be delivered. It was stated that this approach reflects the principles of the NPPF to achieve optimal densities of development and would be expected to align with national policy guidance.</p> <p>Some respondents stated that tall buildings were supported where proposed in the right setting within the area. One respondent indicated support for higher density of 200dph, where development is delivered via a coordinated approach. One respondent suggested that a ‘block plan’ should accompany the policy stating the approximate number of storeys that would be considered suitable on development plots within the overall area. One respondent commented that tall buildings were supported where they were of appropriate design. In relation to tall building development, one respondent stated the need to regard to daylight and sun lighting where this would otherwise inhibit making efficient use of a site.</p> <p><i>Comments in objection (2):</i> One respondent considered that proposals for high-density tower blocks are inappropriate in a city that has a low-rise Georgian/Victorian context. It was stated that there is space for infill developments within the city that should be utilised. It was commented that the Bedminster Green development is appropriate infill, however suggested that it should be 7 stories or below (of mid-scale height). It was considered by one respondent that the proposed concentration / density could be better achieved with mid-level housing.</p> <p><i>Comments neither in support nor objection (2):</i> One respondent raised concern about the danger of building residential towers which have no relationship with existing Victorian buildings. It was suggested that the Plan includes a requirement for quality design in order to deliver this type of development appropriately and in relation to surrounding context. One respondent requested that the policy must re-iterate that tall buildings should be sited with consideration of topography, to avoid development that would adversely mask certain areas; specific reference was made to Pyle Hill and Windmill Hill.</p>	<p>56, 120, 627, 648, 666, 840, 851, 882</p>

<p>Infrastructure and Transport:</p> <p><i>Comments in support (1):</i> One respondent expressed support for the intention to improve facilities at Bedminster station. It was stated that improved CCTV and more welcoming ambience are essential to encouraging use of the station. In addition, it was noted that WECA are considering a programme of improvements to local stations, possibly using money from the Transforming Cities Fund.</p> <p><i>Comments neither in support nor objection (2):</i> One respondent proposed the inclusion of additional supporting text to state that through the duty to co-operate, employment development in accordance with Joint Spatial Plan Policy 4 will be supported as well as proposals aimed at improving public transport access. Support was expressed by one respondent for improvements to Bedminster railway station with improved shelters, lighting, CCTV, potentially as part of Portishead line redevelopment. It was stated that there is need to improve local bus services from South Bristol to the City Centre and North Bristol, with bus priority not just for Metrobus services.</p>	<p>401, 862, 963</p>
--	----------------------

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 22 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Environment Agency (1): The Environment Agency (EA) confirmed that the Malago is designated as a Main River. It was stated that the EA require an 8-metre set back distance from the brink of the bank to allow for future flood risk management works and allow for emergency 24/7 365 day a year operational access to the watercourse. It was stated that development would provide an opportunity to open up the river, make space for water and improve amenity and biodiversity 'net gain', delivering the aspirations of the UK Government 25 Year Environment Plan. It was commented that some of this area is in the current or future Flood Zone 3 and as such the Sequential and Exception Tests must also be applied in accordance with national planning policy.</p>	<p>Ref 964</p>

15. DS9: Brislington

Overview: In total, 12 respondents made 22 comments regarding policy DS9: Brislington. Key themes are identified in the table below.

Table 23 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of development</p> <p><i>Comments in support (4):</i> General support was provided for the policy approach to the area by some respondents. In the context of Bristol's housing need, two comments stated support for the designation of the Growth and Regeneration Area noting that the area is ideal for residential development. One respondent specifically supported the proposed de-designation of the area from protected Industrial and Warehousing land.</p> <p>The ability to deliver a co-ordinated approach to redevelopment was considered by one respondent to be out of control of any future applicant or landowner, as there are multiple landowners in area. However, a number of respondents welcomed opportunities to liaise with the Council and bring land forward.</p> <p>One respondent suggested that the policy should make reference to existing site allocations within the text and make clear how policy DS9 requirements will be applied to retained allocations that already have site specific development considerations in the adopted Plan. It was suggested that the policy text should better signpost this list of allocations. Reference was made by one respondent to Flowers Hill, an existing allocation (BSA1203) in this regard.</p> <p><i>Comments neither in support nor objection (2):</i> One respondent requested the inclusion of urban food growing within DS9 development aspirations, to include green infrastructure urban food growing and public realm enhancements. One respondent stated that they would like to see the regeneration of shopping centre and remodelling of Village centre.</p>	196, 292, 797, 872, 890, 963, 964
<p>Housing</p> <p><i>Comments in support (3):</i> Support for the proposed level and density of housing development was provided by some respondents, who considered policy provisions to be appropriate to the area. One respondent stated that design of homes need to be in context of the rural park area around the Green Belt and towards Hicks Gate. One respondent raised particular support for the promotion of significant new residential development on previously developed land. It was stated that there is evidence that there is keen demand for residential units, such as in recent conversion of Orchard House to 54 flats. It was expressed that during consultation on that site, residents voiced strong support for provision of more residential accommodation locally. It was commented that mix of housing development is supported, with strong focus on first time buyer and affordable housing.</p> <p><i>Comments in objection (1):</i> Objection was raised to the requirement for housing proposals in Growth and Regeneration Areas to provide employment as part of their scheme where they are replacing an employment unit no longer in use, as this risk undermining priority of maximising housing delivery.</p>	292, 842, 872, 888, 890, 904, 963

Key Themes	Respondent References
<p><i>Comments neither in support nor objection (3):</i> Two respondents suggested that Brislington should include specific allocation of plots to community-led housing, as part of the wider mix of new housing proposed for the area. It was recommended that this housing type should comprise, as a minimum, 10% of new residential development. One respondent stated that the identified Policy boundary of the Growth Area should be redrawn to include the Wilverley Trading Estate.</p>	
<p>Employment</p> <p><i>Comments in support (1):</i> Support was expressed for the de-designation of Principal Industrial and Warehousing Areas (PIWA) with the Brislington area.</p> <p><i>Comments neither in support nor objection (3):</i> One respondent stated that the policy proposals were generally supported, including the incorporation of workspace employment. Concern was raised about the provision of sufficient employment space for light, medium and larger industrial uses for South East Bristol. One respondent suggested the removal of 'workspace' from policy wording, as BCC have identified employment areas to be given greater protection from change of use. It was commented that employment areas outside of these should not be subject to this policy requirement which risks them being unviable for development.</p> <p>The requirement for workspace in development was stated by one respondent to be ambiguous as it is not explained what would constitute an appropriate form and amount of new workspace. It was noted that the policy contains no detail on type of information an applicant should look to provide to evidence an 'appropriate' amount of workspace. It was suggested that it would be useful to signpost to other relevant policies here, including E2, E3 and E7, of which provide further detail with regards to employment.</p> <p>It was stated that it was also unclear how the policy requirement relates to existing site allocations which already have site specific considerations set out in the currently adopted Plan.</p>	<p>871, 872, 888, 890</p>
<p>Infrastructure and Transport</p> <p><i>Comments in support (1):</i> One respondent considered the location of the Growth and Regeneration Area to be highly sustainable.</p> <p><i>Comments neither in support nor objection (3):</i> One respondent noted that proposals for south east Bristol and Whitchurch indicate that Stockwood will have approximately 800 new properties on the Brislington P&R site. Concern was raised that the Local Plan does not refer to infrastructure required for future residents including local amenities such as schools.</p> <p>One respondent stated that public and alternative transport options should be improved as part of this development to prevent exacerbation of the already congested Bath Road. One respondent specifically stated the need to improve bus services to the district centre in Keynsham and Bath, with Bus priority along A4 to Hicks Gate new P&R site. It was suggested that the proposed Brislington Bypass along the North Somerset Railway Line should be for walking, cycling and public transport. It was also suggested that the Brislington P&R should be relocated in BANES.</p>	<p>292, 581, 797, 963</p>

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 24 Comments from statutory bodies and partnerships

Consultee	Reference
Environment Agency (1): The Environment Agency (EA) stated that development should be located outside of the current and future floodplain of the Brislington Brook which is a rapid response catchment. It was noted that flood risk is not mentioned within the policy text for DS9, although this is known to be a risk in some parts of the Growth and Regeneration Area. It was commented that this area also benefits from flood risk management infrastructure in and around the Brislington Brook.	Ref 964

16. Section 4.3.10 – 15: Hengrove and Knowle West

Overview: In total, 15 respondents made 21 comments regarding Hengrove and Knowle West. Key themes are identified in the table below.

Table 25 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General Principle of Development:</p> <p><i>Comments in support (1):</i> One respondent stated that identification of Hengrove as a District Centre and a location within a Growth and Regeneration Area is supported. It was noted that this marks Hengrove as a place where new residential development should be considered for higher than minimum density. It was commented that the Hengrove and Whitchurch Park NDP suggested a density of 70dph within the Hengrove site in order to enable the park footprint to be maximised.</p> <p><i>Comments in objection (2):</i> One respondent objected to the development of the South Bristol Orbital Highway, as it was considered that the proposal itself would cause significant impact and sever harm to the Whitchurch community; it was suggested that this proposal should not be proceeded with.</p> <p>One respondent raised concern about the lack of policy relating to Knowle West, Hartcliffe, Withywood, Hengrove, Whitchurch Park and Bishopsworth. It is commented that there is limited detail concerning how sustainable mixed communities are to be developed; and it was requested that a Greater South Bristol Regeneration Framework be developed.</p> <p><i>Comments neither in support nor objection (1):</i> One respondent queried how the new Callington Road link and the inability to right turn off the Bath Rd relate to the Local Plan development strategy. It was acknowledged that while the detail of this is not in the remit of the Local Plan, a joined-up approach with the Local Plan and JLTP4 is required.</p>	581, 629, 655, 873
<p>Hengrove and Whitchurch Park NDP</p> <p><i>Comments in support (2):</i> Broad support was expressed for the role of the Hengrove and Whitchurch Park NDP as set out in the Local Plan. It was noted by one respondent that reference is made to a spatial framework, of which will guide the delivery of new homes at Hengrove Park, and a current planning application that was refused at committee (18/03537/PB). It was suggested that reference to the planning application be removed. One respondent stated that there needs to be more local employment land allocated in Filwood and Knowle West.</p> <p><i>Comments in objection (1):</i> One respondent raised objection to the requirement for housing proposals in Growth and Regeneration Areas to provide employment as part of their scheme where they are replacing an employment unit no longer in use, as this could risk undermining priority of maximising housing delivery.</p> <p><i>Comments neither in support nor objection (1):</i> One respondent queried why the proposal for a second town centre at Hengrove Park has been removed from the draft Plan. Concerned was also expressed about the lack of sizeable employment land allocation at Hengrove Park, as it was considered that this area has known</p>	655, 871, 888, 963

Key Themes	Respondent References
existing demand for light/medium employment space.	
<p>Hengrove Park, Hartcliffe, Whitchurch Park:</p> <p><i>Comments in support (1):</i> One respondent expressed support for additional housing development in this location. It was suggested that development should include an improved transport corridor from Whitchurch through Hengrove Park to Callington Road, and the North Somerset Rail line and Spine Road to Temple Medas and Old Market, with MetroBus or light rail links.</p> <p><i>Comments in objection (2):</i> One respondent raised an objection to development plans for the final section of the South Bristol ring road into Whitchurch. A general objection was raised to proposed housing development and intensification of housing development, in particular, at Ashton and Southville.</p> <p>One respondent made an objection the content of paragraph 4.3.13, on the basis that it is incompatible and factually incorrect, as the spatial framework referred to have been proposed by a developer and is not a formal planning document. It was stated that the quantity of homes and their location, alongside key transport links and provision of public open spaces conflicts with the HWNDP. It was suggested that be omitted from the Local Plan.</p> <p><i>Comments neither in support nor objection (2):</i> One respondent suggested that there should be provision for community housing on Hengrove and Hartcliffe Campus sites. One respondent strongly advocated a new town centre which was suggested to be located on Hengrove Park in order to serve the existing deprived areas and the new homes proposed. Reference was made to current Local Plan policy BCS1, which highlights the potential for a new town centre in South Bristol.</p>	323, 629, 793, 873, 963
<p>Knowle West:</p> <p><i>Comments neither in support nor objection (8):</i> A number of respondents expressed support for the reference to the Knowle West Regeneration Framework within the Plan, stating:</p> <ul style="list-style-type: none"> • One respondent requested that the reference to the Framework is expanded to include the existing Plan, Citizen Design Code and agreed Community Objectives, so that those bringing proposals forward will be fully aware of their presence. • A second comment requested that this detail was added to the Site Allocations so that developers would need to evidence how they had responded to these. • One respondent stated that there needs to be a reference that the Framework itself has changed, given some of the sites within this have come forward for development. • One respondent stated that the Framework should have specific reference to fulfilling the requirements of existing and future residents, expanding on the community-led housing approach. • One respondent stated that in the context of this Framework, land needs to be retained and development to create jobs in the area and reduce travel to North Bristol. <p>An objection was raised by one respondent to any uplift in housing numbers through intensifying numbers on existing allocated sites, as this would put undue pressure on existing services within the area. It was stated that there is currently</p>	609, 616, 623, 751, 842, 871, 904, 963

Key Themes	Respondent References
<p>no clear mechanism for increasing the number of services and infrastructure facilities within the area. Development of a supermarket on Filwood Broadway, or the improvement of local centres within the Knowle West area including Melvin Square, Newquay Road and Inns Court was requested; policy wording amendments were provided to reflect this. On this basis, it was stated that existing allocations BSA1120 and BSA112 be amended to increase the level of retail floor space, to accommodate approximately 1,000m² net of convenience retail floor space.</p> <p>Two respondents stated that feedback from the local community suggests that Site Allocation BSA 1108 on Novers Hill would be a suitable site for community-led development to meet the needs of people in Knowle West and more widely across South Bristol. It was also suggested that this could work well as a demonstration space for community-led and local alternative housing models, including modular construction methods and tiny homes.</p>	

17. DS10: Changes to the Green Belt in South Bristol

Overview: In total, 64 respondents made 66 comments regarding policy DS10: Changes to the Green Belt in South Bristol. Key themes are identified in the table below.

Table 26 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of Green Belt release:</p> <p><i>Comments in support (3):</i> One comment expressed support for the amendment to the Green Belt boundary on the basis that 'exceptional circumstances' exist, which include housing need, the poor contribution that the land makes to the purposes of including it within the Green Belt and the sustainable development that could be achieved if certain areas were released for development.</p> <p>Another comment in support of the removal of Green Belt land considers that new strategic development locations it provides will complement development in the existing urban area. It states that the construction of the new link road and part of the MetroBus system has had the effect of separating the area to the east from the rest of the Green Belt and provides a new definitive boundary.</p> <p>One comment in support stated that the policy needs to demonstrate co-operation with neighbouring authorities, and that this policy should include an acknowledgement of the need to liaise with North Somerset Council to ensure release of Green Belt land within North Somerset, to facilitate development of the Land at Ashton Gate allocation in DS11.</p> <p><i>Comments in objection (55):</i> Many respondents stated objection or strong objection to the principle of Green Belt release, with varied reasons given for this objection:</p> <ul style="list-style-type: none"> • Lack of Exceptional Circumstances created by South Bristol Link Road: <ul style="list-style-type: none"> ○ One theme of objections was a feeling that 'exceptional circumstances' do not exist, and that the release of Green Belt is not justified by the construction of the South Bristol Link road (SBL). Some respondents felt that the community had been misled, as they had been assured at the time of construction of the SBL that this would not result in Green Belt release or development either side of it. ○ Other respondents stated concern that the use of the SBL as justification could result in a precedent being set for other roads, while one respondent made a comparison to the M32, stating that its construction did not justify or result in development either side of it. • Land is performing the purposes of the Green Belt: Many objection comments referred to Green Belt release as undermining its purpose which is to prevent sprawl and cited the benefits of the land earmarked for release, including providing fresh air in an area of bad air quality, providing ecological habitats and tree cover, providing wildlife corridors and providing open space for recreation. • Preference for brownfield development: Many comments stated that the emphasis of the Local Plan should be on brownfield development and that this must be maximised before resorting to Green Belt release, given the permanent effects of loss of Green Belt. Comments stated that more effort 	<p>67, 79, 101, 134, 135, 223, 228, 237, 244, 275, 296, 318, 323, 324, 340, 350, 354, 356, 360, 383, 396, 417, 420, 432, 435, 462, 475, 481, 532, 535, 560, 563, 569, 572, 590, 591, 621, 633, 635, 645, 646, 664, 666, 675, 683, 707, 761, 766, 777, 782, 801, 829, 866, 871, 873, 883, 894, 903, 909, 915, 916, 963, 964, 966</p>

Key Themes	Respondent References
<p>should be brought to bring brownfield sites forward, such as compulsory purchase, or to increase densities in lower density areas of Bristol such as Clifton. The sustainability of Green Belt land in comparison to brownfield sites, particularly in terms of reliance on transport, was stated.</p> <ul style="list-style-type: none"> • Cumulative impact of Green Belt release: Several comments referred to the potential of Green Belt release in adjacent land within the North Somerset Council boundary, with concerns over the cumulative effect of this. It was stated that there is a need to understand the proposals that North Somerset Council have for the Green Belt land, or for the proposals to be brought forward together so that the community can gain full understanding. One comment suggested the proposals in DS10 are piecemeal and should instead be part of a wider West of England Green Belt review. • Fails to demonstrate sustainable development: Several respondents referred to climate change and the need to protect Green Belt land in light of the climate change emergency. The supposed focus of Bristol City Council on sustainability and local food production, as well as having been Green Capital in 2015, were stated as reasons that the Council should be aiming to prevent Green Belt release and seek more sustainable development. • Lack of Housing Need: Objection comments also referred to existing overcrowding in Bristol, querying why there is a need for more housing. Related to this were concerns about existing pressures on infrastructure and services. One comment queried why Bristol leaders accept the need for housing and suggested they should instead challenge central government to invest more in the Midlands and North of the UK. One comment in objection stated that that long-term solutions to the housing shortage must sought instead of pursuing Green Belt release, suggesting incentives to create behavioural changes, such as multiple occupancy, less speculative ownership and living longer in the family home, which would reduce demand for new housing and therefore Green Belt release. • Demand for mixed use: One comment objected on the basis that the release of Green Belt should be for mixed use development. • Role of current land use in food production: One comment in objection proposed various amendments to the policy text, most notably a request that it states that "Bristol Green Belt land will be reserved for food production and related agricultural enterprises, recognising the importance of strengthening local food security and resilience in a changing climate." • Level of affordable housing: One comment objecting states that if the basis for the Green Belt release is the provision of 40% affordable housing on the sites, there should be a full explanation of how this will be delivered, particularly in context of other developments that have not provided it. <p><i>Comments neither in support nor objection (4):</i> One comment raises general concerns about the potential impacts of the Green Belt release, while another comment states that it is not clear from the policy what the demand for releasing Green Belt is and a lack of evidence for demonstrating exceptional circumstances.</p> <p>One respondent commented that the construction of the South Bristol Link road has brought about windfall land gains from Brookgate Business Park to Highridge and states that these could provide additional, much-needed employment land.</p>	

Key Themes	Respondent References
<p>The comment requests that a survey is undertaken to ascertain the potential for employment and economic development on this area of land to promote the future economy of South Bristol, and requests that Enterprise Area Status is sought for employment land in South Bristol.</p> <p>One comment states that the removal of Green Belt without compensatory open space or tree planting is contrary to goals of One City plan and its commitments to increase tree canopy cover.</p>	
<p>Policy for remaining and previously developed Green Belt land: <i>Comments neither in support nor objection (2):</i> One comment queries why it is necessary to change the status of existing Green Belt land if Local Green Space offers the same level as protection as Green Belt. The comment states that Green Belt has worked successfully for over 60 years to prevent sprawl and if some parts are to be released, the remaining parts need more protection than ever.</p> <p>One comment set out that the policy text should be amended to state that the remaining Green Belt will be protected from inappropriate development and that the Council will look to maximise the use of Council-owned Green Belt for carbon drawdown and nature regeneration, including tree planting and nature friendly food-growing. It suggests that redevelopment of previously developed sites in the Green Belt will be encouraged where it would contribute to delivery of affordable homes and not substantially harm the openness of the Green Belt, resulting in overall improvements to the quality of the natural environment through habitat increase and tree cover.</p>	244, 802

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 27 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Bath and North East Somerset Council (1) An SDL is identified at Whitchurch in the JSP. Allocation of this land and definition of new Green Belt boundary will be through BANES Local Plan. It will require significant new transport infrastructure. BANES will work closely with BCC to plan for this new neighbourhood and infrastructure through BANES Local Plan. Suggest BCC Local Plan may need to consider any spatial implications arising for this part of city as planning of the new neighbourhood progresses.</p>	Ref 903
<p>Environment Agency (1): EA object to the development allocation shown adjacent to the Long Ashton Park and Ride, until such time it has been demonstrated, to their satisfaction that the site is not at flood risk.</p> <p>Comments in relation to the flood storage area as mitigation for the MetroBus scheme. A flood storage area was constructed in proximity of this proposed allocation as mitigation for the scheme, however this is not yet shown on the Flood Map for Planning: Rivers and Sea. It was a condition of the planning permission to update the flood modelling to include this flood storage area, which will enable us to update our flood map. However, this has not yet been done. EA recommend that the developer of the MetroBus scheme updates this modelling. We need to ensure this proposed allocation is not adversely impacted by the nearby storage area. The flood storage area for the Metrobus will be Flood Zone</p>	Ref 964

Consultee	Reference
3b once the Flood Map is updated. As such this area is designed to flood and prevents flooding to the surrounding area. Therefore, EA could not allow development here in line with the National Planning Policy Framework. Similarly, development in proximity of this area must be demonstrated to be safe from flood risk for the lifetime of development.	

18. DS11: Development allocations – southwest Bristol

Overview: In total, 83 respondents made 149 comments regarding policy DS11: Development allocations – southwest Bristol. Key themes are identified in the table below.

Table 28 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of development</p> <p><i>Comments in support (1):</i> One comment in support of policy DS11 provided an updated Development Framework and Sustainability Appraisal for the Yew Tree Farm allocation.</p> <p><i>Comments in objection (22):</i> Comments in objection to the principle of policy DS11 were generally very similar to those recorded for policy DS10, with respondents objecting to the principle of Green Belt release.</p> <p>Several comments objected to Green Belt release in these locations because they considered that brownfield land should be the focus of development, and that to remove Green Belt land is not in-keeping with the environmental agenda of Bristol City Council due to the potential harm to biodiversity. Some comments referenced the Climate Emergency. Several comments considered the location of development to be unsustainable as it would increase traffic congestion in the area. One comment stated that the land is needed for the safeguarding of nature recovery sites, as detailed in the WENP Nature Recovery Network Mapping.</p> <p>Several comments objected to the principle of DS11 on the basis that exceptional circumstances for the Green Belt release are not evidenced and they disagreed with the justification of the South Bristol Link road (SBL). One comment stated that the Environmental Statement of the SBL did not assess environmental effects of the road in conjunction with Green Belt development. Some comments objected in principle on the basis of considering specific allocations unsuitable for development, such as Yew Tree Farm or Elsbert Drive.</p> <p>Several comments stated that the Bishopsworth ward area has already contributed significantly to the housing target and therefore object to further development. Linked to this, many comments raised concerns over the capacity of infrastructure in the area to cope with further development.</p> <p>Several comments raised concern over the health impacts of Green Belt development in these locations, due to the use of the land for recreation by local residents, including impacts on their wellbeing. The impact of development on the amenity of residents generally was also raised as a concern.</p> <p><i>Comments neither in support nor objection (7):</i> Some comments stated the need for clarifications of the policy. Clarifications were sought on: affordable housing delivery for the sites; better understanding on how development in North Somerset boundaries adjacent will coincide with the proposals of DS11; and, further detail on transport infrastructure plans including a Park and Ride for the A38. One comment stated that development in these locations should not be for housing but should be mixed use.</p>	<p>67, 79, 244, 275, 329, 349, 383, 396, 569, 572, 590, 591, 635, 650, 652, 675, 683, 707, 759, 766, 793, 801, 829, 844, 858, 866, 871, 873, 961, 966</p>

Key Themes	Respondent References
<p>Some comments related specifically to the plan layout itself, requesting that the DS11 allocations are included in the Development Allocations document for consistency, and requesting that the Development Strategy maps highlight areas of Green Belt loss, as well as retention.</p> <p>One comment stated that a Joint Authorities Greater Economic area should be created with regards to the shared boundaries with other Local Authorities in this area.</p>	
<p>Land at Ashton Gate <i>Comments in support (1):</i> One comment stated general support for housing proposals at Ashton Gate.</p> <p><i>Comments neither in support nor objection (1):</i> The comment noted that the site is incorrectly labelled and should be called 'Land North of Metrobus at Ashton Vale'; it was requested that this is amended. The respondent supported the allocation and its justification and considered that there is commitment from the developer to deliver the site in the plan period. Comments stated that Diagram 4.3.1 does not accurately reflect the developable area of the site as per previous inquiries with the Council and should be amended. The respondent suggested the policy be worded flexibly to should allow for more than 500 homes, if appropriate and policy compliant. It was stated that access will need to be provided within the North Somerset boundary at Long Ashton park and ride, requiring an acknowledgment in the policy to work co-operatively with North Somerset Council to facilitate the site's delivery.</p>	403, 829, 871
<p>Diversion of Ashton Vale Road <i>Comments neither in support nor objection (1):</i> The comment requested more detail and clarity on the transport infrastructure being planned as part of policy DS11.</p>	844
<p>Land at Yew Tree Farm (Bedminster Down) <i>Comments in support (1):</i> The respondent supported the allocation for 200 dwellings, stating that development at Yew Tree Farm would not result in encroachment into the Green Belt in Bristol and the openness of the Green Belt in this area would remain unchanged. It was considered that the development would form a definitive edge to Bedminster in line with the western boundary of existing settlements south of the A38. A landscape assessment of the site was also submitted by the respondent.</p> <p><i>Comments in objection (54):</i> Many comments objected to development at this site because it would result in the loss of Yew Tree Farm, the last working farm in the city boundaries. Many comments felt that this farm is a heritage asset to the city, having been established for 120 years and felt that the impact on the farmers, who have run the farm for 50 years, would be unacceptable and contrary to Bristol City Council values of diversity and inclusion. Furthermore, many objectors considered the loss of the farm would have an unacceptable environmental impact, stating that the existing farm is a sustainable and environmentally beneficial practice, providing habitat for wildlife and pollinators. It was felt that to develop this site would be at odds with Bristol City Council's Green Capital 2015 status and section 10.20 of the Local Plan Review on Food Systems, as well as the</p>	40, 67, 79, 228, 237, 244, 275, 299, 300, 315, 318, 320, 332, 335, 340, 341, 344, 345, 347, 350, 353, 354, 356, 383, 413, 417, 432, 435, 475, 481, 532, 537, 572, 585, 603, 621, 633, 635, 645, 646, 666, 707, 759, 769, 773, 777, 784, 793, 796, 797, 801, 842, 866, 897, 898, 904, 961, 963, 966

Key Themes	Respondent References
<p>Council's Going for Gold local food initiative.</p> <p>Some comments stated that the development would urbanise the countryside and cause further traffic congestion and air pollution, which is inappropriate in a time of a climate emergency. Others stated that the area has already had substantial development and infrastructure cannot cope with further development. Some objections were to the underlying principle of Green Belt release, as cited in DS10 and DS11 'principle of development' comments.</p> <p>Some comments stated that the overall cost of the development with regards to the environment is not outweighed by its benefits, and that 200 homes would not make a substantial contribution to the housing target. The approach was therefore labelled by several comments as short-sighted. Several comments made reference to local objection to this policy, stating that insufficient regard is being had to the strength of local objection.</p> <p><i>Comments neither in support nor objection (4):</i> Two comments stated that community led housing may be appropriate for the site, but only if a majority agreement from the local community can be demonstrated. Another comment requested that the community has an input in defining final boundaries of the Green Belt development. One comment suggested that Yew Tree Farm should be protected as Local Green Space as per Stapleton Allotments in policy GI4.</p>	
<p>Land adjacent to Elsbet Drive</p> <p><i>Comments in support (1):</i> One comment supported the allocation of the site, considering that exceptional circumstances for Green Belt release do exist on the basis of housing need, the poor contribution the land makes to the Green Belt's purpose, and sustainable development it could achieve. The comment suggested that the potential capacity of the site is 120 homes, taking into account access requirements, public open space and public rights of way. It suggests the policy text reflects this, stating a minimum requirement of 100 homes and up to 150 homes.</p> <p><i>Comments in objection (23):</i> Many objections felt that the development would undermine the purpose of the Green Belt and was not sufficiently justified as 'exceptional circumstances'. The need to build on brownfield first was stated, as well as a view that it is simply cheaper for developers to build on Green Belt. One comment felt that 150 homes on the site would be overdevelopment. Several comments made reference to the existing value of the site as Green Belt, with its semi-rural nature providing views to the countryside in Dundry and Long Ashton. Several comments stated the existing site should be a Village Green.</p> <p>Many objections raised the unacceptable environmental impacts of development, stating that the existing land provides habitat for wildlife as well as recreational space and public rights of way for residents. It was felt that to develop this site would be at odds with Bristol City Council's Green Capital 2015 status and environmental credentials. Some residents felt that the development would not be zero-carbon due to the energy required to build the housing. Some comments stated that the development would urbanise the countryside and cause further traffic congestion and air pollution, which is inappropriate in a time of a climate</p>	<p>40, 67, 79, 223, 228, 237, 275, 296, 350, 354, 360, 420, 435, 462, 481, 532, 572, 633, 649, 683, 707, 759, 784, 966</p>

Key Themes	Respondent References
<p>emergency.</p> <p>Some comments made reference to the impact on existing residents, including loss of open space, loss of views, worsened air quality and road safety concerns (particularly for elderly residents). It was considered that substantial housing development in the area has already resulted in pressured infrastructure and services. One comment queried whether there is sufficient demand for housing in the area, citing a recent development (Martha's Orchard) which still has houses for sale two years after construction. Concerns about the suitability of the access from the site were raised, in particular that the existing site does not have a direct access to the South Bristol Link road, and references to existing public rights of way over the site were made.</p> <p>A petition was submitted objecting to proposals at Elsbet Drive.</p>	
<p>Affordable housing</p> <p><i>Comments in objection (3):</i> One comment objected to the requirements of affordable housing, stating that there is no justification or evidence for a 40% target, which is higher than the 35% JSP requirement, and that this needs viability testing. One comment considered that community-led housing is social housing, and objected to delivery of social housing, making a suggestion that smaller bungalows for older people to downsize into is what is required. One comment objected because the affordable housing and housing mix is likely to result in increased families without supporting social infrastructure.</p> <p><i>Comments neither in support nor objection (4):</i> Two comments stated that Bristol City Council has poor record building affordable homes and requested clarity on implementation of the policy. The comments also raised concern about the quality of homes and fireproofing.</p> <p>Two comments considered that a 40% requirement lacks sufficient evidence and requested clarification on why this is higher than the 35% JSP requirement, as well as viability testing. It was stated that flexibility is needed in the policy to apply on a site-by-site basis and allow for sites that may need significant remediation (such as Land at Ashton Gate, which is former landfill) and higher development costs, which may impact on affordable housing provision.</p>	<p>79, 228, 237, 420, 649, 829, 866</p>
<p>Community led / self-build (5% requirement)</p> <p><i>Comments in support (2):</i> Two comments supported the inclusion of specific proportions of community-led housing/self-build, however it was queried why this requirement is not for other sites across Bristol. The comments considered 5% to be a relatively small number of homes delivered for sites of <200 homes and stated that integration in terms of design with the wider market housing scheme may be challenging.</p> <p><i>Comments in objection (1):</i> One objection requested that this requirement is removed from DS11 or at least from Elsbet Drive allocation, as there is no opportunity to successfully or efficiently create a separate area for community-led or self-build housing within a development of such a moderate scale.</p> <p><i>Comments neither in support nor objection (3):</i> One comment stated that there is</p>	<p>244, 420, 829, 842, 866, 904</p>

Key Themes	Respondent References
<p>doubt over the ability of Bristol City Council to enforce such a policy given pressure to meet housing targets.</p> <p>One comment considered that there is not sufficient evidence for this requirement or a justification. It stated that flexibility is needed in the policy to apply on a site by site basis and allow for sites that may need significant remediation (such as Land at Ashton Gate, which is former landfill) and higher development costs, which may impact on provision. A comment stated that Community Led Housing is not always appropriate for all housing types, such as flats, and this should be recognised in the policy.</p> <p>One comment queried if self-build plots within a wider market housing scheme would be attractive to self-builders. It suggested that the policy should have a reference to a maximum 12-month marketing period after which the plots can be developed as part of the main scheme so as not to prevent deliverability of the allocations.</p>	
<p>Infrastructure and transport</p> <p><i>Comments in objection (9):</i> Most comments in objection raised concerns about the impact of new development on the existing infrastructure, which was considered by many to already be stretched. Reference was made to oversubscribed GPs and schools, and traffic congestion issues as well as parking pressures. Concern was raised about the ability of emergency vehicles to access new housing due to parking issues. One comment stated that there are not enough jobs in the area to support development.</p> <p>With regard to traffic, several comments raised concern that the developments would be reliant on cars and increase air pollution because public transport is not sufficient, with one comment stating that Metrobus was not delivered to the area as promised. One comment requested that a viable air pollution strategy and good public transport is in place before developing these sites.</p> <p>One comment also raised concern about land stability due to the mining history of the area, while another stated that South Bristol Crematorium must remain a tranquil and accessible environment.</p> <p><i>Comments neither in support nor objection (7):</i> Several comments requested clarity on where new infrastructure will be built and one comment suggested new infrastructure and employment facilities would be more effective to drive growth and regeneration in the area. One comment raised concern about sufficient water supply for new development.</p> <p>One comment queried if the CIL money from development could be used on infrastructure rather than central council funding, given funding pressures. With regard to transport, concern about congestion was raised and a request for more information on traffic impacts at Bishopsworth and planned improvements. One comment queried why there is no mention in the policy of reopening Ashton Gate station or improving the existing Parson Street station, given significant growth in its patronage.</p>	<p>67, 79, 226, 237, 244, 296, 332, 401, 633, 649, 759, 777, 784, 793, 801, 966</p>

Key Themes	Respondent References
<p>Flood risk</p> <p><i>Comments in objection (1):</i> One comment in objection was concerned with flooding as a result of Green Belt development, which would also destroy wildlife.</p> <p><i>Comments neither in support nor objection (2):</i> Two comments raised concern about the effects of increased tarmac and concrete in the area and the risk of flooding through new development without enough green spaces, particularly as climate change will likely result in more periods of short heavy rainfall.</p>	79, 228, 237

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 29 Comments from statutory bodies and partnerships

Consultee	Reference
<p>North Somerset Council (1): Support for inclusion of safeguarding the potential diversion of the Ashton Vale Road in Policy DS11. NSC would like to work with BCC to ensure alignment is identified in the Plan. Comment that criteria for the development of this site should also consider the Long Ashton Neighbourhood Plan Policy EV1 (Area of Separation) to reduce the impact of merger within Long Ashton.</p>	Ref 403

19. DS12: New Neighbourhood at Bath Road

Overview: In total, 16 respondents made 21 comments regarding policy DS12: New Neighbourhood at Bath Road. Key themes are identified in the table below.

Table 30 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General Principle of Development and Focus for 750 Homes:</p> <p><i>Comments in support (1):</i> The development proposed through the draft policy was considered by some respondents to be highly sustainable, and one respondent stated that the density of the site should be optimised due to its sustainability and suitability to development, and to allow for potential uplift of housing requirement that may result from the Joint Spatial Plan Examination process. The need for cross-boundary working with neighbouring councils and at the West of England level was also stated in relation to the site, including the need for a more defined and robust revised Green Belt boundary. It was suggested that land north of the A4, including Brislington Cricket Club should also be included in the development boundary.</p> <p><i>Comments in objection (4):</i> Of those raising concern about the draft policy, comments primarily objected to the principle of Green Belt release on the basis that this undermines the purpose of the Green Belt and due to environmental impacts, such as loss of nature recovery sites and loss of mature trees. A need for more joined up thinking at a regional level of nature recovery sites was cited, as well as a concern that the policy would result in short term benefits of housing but long-term losses to the environment.</p> <p><i>Comments neither in support nor objection (5):</i> Some respondents sought clarification on the evidence base for the policy, such as a Green Belt assessment, in order to make the policy sound. One respondent suggested that an onus on developers to bring forward a co-ordinated masterplan should be stated in the policy. One respondent suggested that the site could help deliver a significant amount of employment land for South East Bristol and would be suited to do so due to its proximity to Brislington Trading Estates.</p>	356, 612, 635, 645, 845, 871, 886, 888, 903, 958
<p>Affordable Housing</p> <p><i>Comments in objection (1):</i> The comment stated that there is insufficient evidence for the requirement of 40% affordable housing on the site or why it exceeds the 35% target of the Joint Spatial Plan. It stated that the policy needs evidence relating to viability in accordance with national policy and that it is currently in conflict with paragraph 34 of the NPPF.</p>	845
<p>Community led / self-build (5%)</p> <p><i>Comments in support (2):</i> Support for the policy requirement suggested it could be increased to 10% and suggested different mechanisms for delivering self-build or community housing on the site.</p> <p><i>Comments in objection (1):</i> The objection to this requirement stated that it lacked evidence and viability testing, especially when considered against other development requirements cumulatively, and that it is subsequently in conflict with paragraph 34 of the NPPF.</p>	842, 845, 904

<p>Allotments</p> <p><i>Comments in support (2):</i> Two comments were general expressions of support for the retention of Bath Road Allotments.</p> <p><i>Comments neither in support nor objection (1):</i> one comment queried why the allotments have not been allocated as Local Green Space.</p>	196, 797, 909
<p>Infrastructure and transport</p> <p><i>Comments neither in support nor objection (2):</i> One comment stated that it is important for a range of transport options to be provided to reduce impacts on the A4 such as congestion.</p> <p><i>Comments in objection (1):</i> One comment stated concern with regards to loss of green space, worsened air quality and worsened traffic congestion as a result of the development, particularly through cumulative impact of other sites such as Brislington Meadows.</p>	356, 797, 903

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 31 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Bath and North East Somerset (2): Exceptional circumstances to justify removal of greenbelt in this location will be established through the JSP but process of defining amended detailed boundary will need to be undertaken through Local Plans. Proposed revised GB boundary is not clearly shown in the plan document (diagram 4.3.1). Suggestion that BCC and BANES need to work together through respective Local Plans to define the revised GB in this area.</p> <p>BANES support the principle of relocating Brislington Park and Ride onto BANES land closer to Hicks Gate roundabout. Detailed location will need to be established in BANES Local Plan requiring joint working with BCC. Development of this neighbourhood will also require other infrastructure such as education, health facilities. Request that BCC work closely with BANES to assess and demonstrate how these requirements will be met and whether they will impact on capacity of services in BANES.</p>	903
<p>Environment Agency (1): Comment provided that the lower reaches of the Scotland Bottom Watercourse are designated as Main River. Development should be set back 8 metres from the brink of the bank of the Main River. Part of the proposals for the Park and Ride relocation fall within Flood Zone 3. If possible, the development should be located within Flood Zone 1 following sequential principles. Where development is necessary in Flood Zone 3 this should be appropriately mitigated. The Lead Local Flood Authority at Bristol City Council should be consulted on local drainage issues.</p>	964

20. Section 4.4: North Bristol

Overview: In total, 9 respondents made comments regarding development in North Bristol. Key themes are identified in the table below.

Table 32 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of development:</p> <p><i>Comments in support (1):</i> One respondent expressed support for the development of new homes in Southmead, Lockleaze, however raised concern that there is no mention of the Henbury loop or potential stations on the route within the draft policy.</p> <p><i>Comments neither in support nor objection (6):</i> One respondent expressed concern that there is no mention of transport provision or access from stations on the Henbury loop including Ashley Down, Horfield, Filton North platform, Charlton, Henbury and Hallen to support the new housing and Bristol Port around Avonmouth and Severn Beach. One respondent stated that the Plan should have reference to Brabazon Hangar and its mixed-use redevelopment potential; and that the diagram within this section should be amended to include both Brabazon hangar and the planned new railway station on Henbury Line loop. It was suggested by one respondent that BCC should work with Eastgate to improve traffic flow around M32 junction and improve walking/cycling.</p> <p>The principle of urban living was addressed by two respondents. One respondent supported the principle of urban living in area, however, considered that there is not sufficiently aspirational development allocations in the North Bristol area. Concern was expressed by one respondent that the policy identifies the area as suited for urban living. It was suggested that the policy refers to 'suburban living' alongside urban living, as North Bristol was considered to be characterised in parts by suburban character and that areas such as Westbury Park, Henleaze, Westbury on Trym, Sneyd Park, Stoke Bishop and Henbury should remain leafy suburbs.</p> <p>One respondent stated that the Plan does not indicate how and where additional housing will be located in North Bristol, beyond key areas of Southmead, Lockleaze and Lawrence Weston, while satisfying other policy requirements such as Green Space and sustainable transport. It was stated that while higher densities may be sought by windfall and conversion sites, this would only result in higher density of cars and on-street parking issues until access to citywide and local public transport is more widely available. One respondent expressed concern over the level of community facilities and supporting infrastructure in North Bristol, where it was queried as to whether if they can cope with the level of growth proposed in the Plan.</p> <p>One respondent stated that Eastgate Retail centre is an essential economic hub, employer and retail amenity for Lockleaze; and requested greater clarity on its role in the City's retail hierarchy. It was considered that while it is treated as 'out of town' shopping centre, it does serve local communities in Lockleaze, Eastona and Eastville. It was suggested that this area needs flexibility to develop and upgrade, remain sustainable as an economic hub and potentially support Stapleton Road</p>	<p>490, 604, 646, 879, 895, 905, 963</p>

Key Themes	Respondent References
<p>BID. A long-term strategy for Eastgate to prevent its gradual erosion was suggested to be essential.</p>	
<p>Housing numbers: <i>Comments in support (1):</i> One respondent stated that Paragraph 4.4.2 is supported and that the redevelopment of underused sites to help deliver at least 6,000 new homes in North Bristol is sensible. It was commented that, given the overriding need for sustainable growth in the West of England required by the JSP and evidence that more sites need to be identified, there is merit in unlocking more sites to exceed the 6,000 homes mentioned.</p> <p><i>Comments in objection (1):</i> One respondent provided an objection to the housing growth projected for delivery within North Bristol and commented that this figure is inappropriate due to level of current infrastructure, particularly transport environment, health and education provision. A general concern was also raised that there is a lack of open green space in Bristol and that projected housing increases will create further pressure to remove and/or downgrade green space.</p>	<p>137, 855</p>

21. DS13: Lockleaze

Overview: In total, 13 respondents made 18 comments regarding policy DS13: Lockleaze. Key themes are identified in the table below.

Table 33 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General Principle of Development</p> <p><i>Comments in support (2):</i> Broad support was expressed for the proposed Growth and Regeneration Area, as set by policy DS13. One respondent expressed support for redevelopment of sites within Lockleaze in order to help facilitate improving connectivity to the area and better integration with other communities to the south and west.</p> <p><i>Comments neither in support nor objection (3):</i> One respondent requested the inclusion of urban food growing within DS13 development aspirations, to include green infrastructure urban food growing and public realm enhancements. One respondent noted that there is a recognition that public transport services need to be developed to make the area more sustainable, however that there should be the onus on developers to delivery this infrastructure. One respondent stated that the policy should refer to the Lockleaze Community Plan (2019 - 2024).</p>	196, 612, 615, 646, 880
<p>Housing Numbers</p> <p><i>Comments in support (1):</i> One respondent stated that Paragraph 4.4.2 is supported and commented that the redevelopment of underused sites to help deliver at least 6,000 new homes in North Bristol is a logical approach. It was stated that, given the overriding need for sustainable growth in the West of England required by the JSP and evidence that more sites need to be identified, there is merit in unlocking more sites to exceed the 6,000 homes mentioned.</p> <p><i>Comments neither in support not objection (1):</i> One respondent stated that they would like to see 40% affordable housing requirement and a local lettings policy for all new build rented properties. It was suggested that a landlord registration scheme should be extended to Lockleaze.</p>	855, 895
<p>Housing density / housing mix</p> <p><i>Comments neither in support not objection (3):</i> All three respondents stated that there is already strong local interest in Community-led Housing (CLH) Two respondents mentioned that Bristol CLT have already co-initiated a development of 50 homes on Shaldon Road, Ashley Vale Action Group planning a development of around 35 homes at Bridge Farm and with action being taken by Lockleaze Neighbourhood Trust to explore the potential for more community-led housing developments in the area. It was recommended that there is scope for greater ambition in the Lockleaze area within the Plan. It was considered that at least 20% of the new houses planned through the area could be delivered through self/custom build and community led housing; and suggested that the site allocations be amended accordingly.</p> <p>One respondent stated that local residents consider 100dph to be inappropriate for the area. It was commented that high density should only be where it fits with existing buildings, for example, adjacent to the Hub and flats on Gainsborough square. It was stated that vistas across Lockleaze, especially from Stoke Park,</p>	842, 895, 904

<p>should not be obscured. It was suggested that there needs to be a mix of different sized properties, particularly 1 and 2 bedrooms, to release 3 bedroom family homes and allow older people to downsize within community.</p>	
<p>Employment <i>Comments neither in support nor objection (3):</i> One respondent expressed strong support to sustain Gainsborough Square as a local retail centre, which is considered to have potential to provide improved shopping and community facilities as hub of Lockleaze. It was commented that workspace is needed, alongside housing, to develop local employment opportunities and prevent Lockleaze becoming a dormitory suburb.</p> <p>One respondent queried why Gainsborough Square is identified within DS13 as a local centre and not Eastgate centre. It was stated that Eastgate needs a positive long-term approach that looks at different levels of traders and employment, to recognise the changing nature of retail. It was expressed that the notion of housing development to remove this local employment centre was a concern. Support was expressed for mixed use within Lockleaze and preventing loss of employment opportunities.</p> <p>One respondent requested removal of 'workspace' from policy wording, as BCC have identified employment areas to be given greater protection from change of use. It was commented that employment areas outside of these should not be subject to this policy requirement as it was considered that this could risk them being unviable for development.</p>	<p>880, 888, 895</p>
<p>Infrastructure and transport <i>Comments neither in support nor objection (3):</i> One respondent requested that they would like to see a commitment to delivery of infrastructure beyond transport. Two respondents stated that digital infrastructure, including broadband access, would be essential to support proposed housing development. One respondent suggested that there needs to be a prioritisation of energy efficient homes e.g. solar panels, district heating with a shared boiler.</p> <p>Delivery of sustainable transport was supported by two respondents, who stated that there is need for the improvement of new walking and cycling routes and inclusion of safer routes to schools, such as upgrades to Sir Johns Lane and Concorde Way path; alongside the coordination of bus services and Park and Ride provision; and improved bus infrastructure and measures to address congestion on Muller Road. One respondent suggested the inclusion of electric charging points in residential development, car club/e-bike access and sustainable travel plans for new development.</p> <p>It was suggested by two respondents that the reopening of Lockleaze/Horfield railway station should be a political priority. One respondent stated that while 1,200 new homes in Lockleaze and new homes in South Gloucestershire is supported, there is no mention within policy of MetroWest or Horfield station, nor bus priority measures on Muller Road, access to stations on the Henbury loop line; nor is there any mention of retail provision and the need to work with South Gloucestershire Council.</p> <p>One respondent stated that alongside development of 1,200 new homes, Lockleaze will need enhanced amenities such as shops, cafes, restaurants, libraries</p>	<p>632, 880, 895, 905</p>

to enable cultural activities and boost the night time economy. It was suggested that some ex-pub sites would need to be retained in light of growing population. It was stated that the capacity of education and health facilities to deal with new housing should be a priority. Cheswick Village was cited as an example which has no new surgery. It was suggested that provision of outreach support should also be considered to avoid future pressure on GPs.

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 34 Comments from statutory bodies and partnerships

Consultee	Reference
Highways England (1): Highways England noted that the relative density of Lockleaze is low, and that therefore some infill could mean that public transport services through the area are more viable. Development in locations which could lead to improved public transport provision was supported, as this was considered to have the potential to release capacity on the local road network that could result in a diversion away from the strategic road network (SRN) for local traffic.	632
Environment Agency (2): It was confirmed by the Environment Agency that Horfield Brook is designated as a Main River. It was stated that development should be set back 8 metres from the brink of the bank of the Main River and be sequentially located. Comments were addressed to Lawrence Weston, where it was stated that new ASEA model runs should be reviewed to determine suitability for development in this location, as it is contrary to the current Strategic Flood Risk Assessment Level 2.	964

22. DS14: Central Southmead

Overview: In total, 7 respondents made 11 comments regarding policy DS14: Central Southmead. Key themes are identified in the table below.

Table 35 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General Principle of Development:</p> <p><i>Comments in support (2):</i> General support was expressed for the regeneration of the Growth Area. One respondent expressed support for the recognition of Southmead Community Plan, which outlines the local priorities for Southmead and acknowledges a shortage of smaller homes within Central Southmead.</p> <p><i>Comments neither in support nor objection (2):</i> One respondent stated that any reference to community facilities in the policy needs to include a direct reference to youth support, as the Community Plan is seeking to achieve a wider range of priorities, break the cycle of poor educational attainment, poorer than average health outcomes and better employment prospects. It was suggested that Glencoyne Square has the capacity to provide community amenities, as does Greystoke Avenue. Policy wording amendments were proposed, to include that development will include new youth provision and improvements to Doncaster Road Park. One respondent suggested the insertion of urban food growing within the policy, given local support from Southmead Development Trust.</p>	196, 611, 615, 646
<p>Housing numbers:</p> <p><i>Comments in support (1):</i> One respondent expressed support for the recognition of Southmead Community Plan, which outlines the local priorities for Southmead and acknowledges a shortage of smaller homes within Central Southmead and a need to enable a greater mixed of accommodation to enable residents to remain locally.</p> <p><i>Comments neither in support nor objection (1):</i> One respondent suggested that affordable housing within the policy could include social housing and shared ownership, but that it should not be limited to just two affordable housing types.</p>	611, 615
<p>Glencoyne Square:</p> <p><i>Comments in support (2):</i> Support was expressed by both respondents for the inclusion of aspirations in the Southmead Community Plan for the redevelopment of Glencoyne Square to include a mix of affordable homes, private housing and community uses. One respondent stated that Glencoyne Square is currently under-utilised as a Green Space. It was stated that any supporting policies (e.g. Draft Policy H5) need to highlight organisations that are leading on community-led regeneration projects with the objective of redeveloping local facilities.</p> <p><i>Comments neither in support nor objection (3):</i> One respondent stated that Doncaster Road Park is identified as providing alternative public open space to replace the reduction at Glencoyne Square. Policy wording amendments were suggested to include that development would entail new youth provision' and improvements to Doncaster Road Park. One respondent stated that the policy needs to refer to the existing plan for Glencoyne Square. One respondent expressed concern that the development of the square without compensatory open space or tree planting would be contrary to goals of One City Plan and commitments to increase canopy cover.</p>	326, 611, 612, 615, 909

23. Section 4.4.11 – 13: Lawrence Weston

One respondent (ref 905) made a comment regarding development in Lawrence Weston. Specifically, the respondent addressed the Lawrence Western Neighbourhood Development Plan (NDP), where concern was raised that paragraph 4.4.11 of the Local Plan did not mention bus services to Southmead hospital, Portway Park & Ride and Cribbs Causeway (the Mall).

24. IDC1: Development contributions and CIL

Overview: In total, 31 respondents made comments regarding policy IDC1 Development contribution and CIL. Key themes, including the proportion of support, object or neutral are identified in the table below.

Table 36 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle:</p> <p><i>Comments in support (4):</i> One comment expressed support for the policy in principle. Another supported the policy subject to its requirements being viable. One comment supported the principle of the policy, and made suggestions of infrastructure and services that could be delivered to enable and support women to work and access public spaces, such as schools, nurseries, GPs, libraries, community spaces and launderettes. Public toilets were also considered an important provision, and it was requested that the public realm should be designed to enable women to have safe, comfortable, free spaces to breastfeed. It was suggested that all new developers should adhere to Secured by Design guidelines by requirement.</p> <p><i>Comments in objection (2):</i> One comment in objection considered that if a development creates a need for new infrastructure, this should be identified and secured before consent is granted. Another comment objected to the reference in IDC1 of obligations being sought from 'any' development, as this is considered to be non-compliant with national policy in relation to affordable housing obligations, for which a threshold of development size is set. It is requested that the policy should explicitly state this exemption.</p> <p><i>Comments neither support nor objection (25):</i> Several comments requested that a reference is made in the policy to viability, and that all planning obligations should be subject to viability. Several comments also suggested that a review of the Council's CIL is required and would be supported. Comments also raised concern over the statement that mitigation will be secured through use of planning obligations, stating that this is not in accordance with the NPPF paragraph 54, which states that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. One comment referred to obligations being sought from 'any' development, which it considered to be non-compliant with national policy in relation to affordable housing obligations, for which a threshold of development size is set. It is requested that the policy should explicitly state this exemption.</p> <p>Several comments made reference to community involvement and Community</p>	<p>76, 309, 420, 442, 446, 488, 491, 603, 610, 616, 635, 646, 799, 802, 815, 816, 817, 818, 819, 820, 827, 829, 844, 870, 884, 885, 888, 893, 909, 964, 968</p>

Asset transfers. It was stated that decisions should be made with constant consultation with local residents, including underrepresented groups and that charities and service providers may be able to assist in facilitating such groups to participate. A request for the council to consider Community Asset Transfers was made, and another comment noted the commitment to Community Asset Transfer in the One City approach. It was stated that this programme should be accelerated to ensure it becomes a mechanism for communities to tackle inequality and promote inclusive growth and social inclusion.

Several comments made reference to the need for community facilities to be delivered through development obligations, including community centres, improved retail, better green spaces and spaces which allow for community groups to function such as lunch clubs and play groups. One comment stated that the policy should be broadened to specifically reference community uses, with reference to Bristol's Social Value Policy. One comment stated that 'best consideration' in the disposal of Council assets should include broad 'equitable' value. One comment suggested the policy could link to the libraries consultation. Specific queries were made about the delivery of a secondary school in Davenry and additional resources needed at Bedminster Green library, and their potential for delivery through IDC1.

Some comments suggested that the planning obligations system needed to ensure it was robust enough to deliver infrastructure. It was suggested that the system had sometimes failed to deliver due to developer's stating viability issues, while another comment stated that infrastructure should be co-ordinated with development to be delivered before or alongside it. It was suggested that CIL should be invested in advance of built-out schemes and there should also be a system to retrofit existing housing areas with infrastructure.

A more robust wording of the policy was also stated in relation to trees, requesting that the policy use the word 'will' instead of 'should', such as 'trees will be provided...' and 'will be sought'. It was stated that there are existing issues with the replacement of trees through section 106 and its relationship with the TreeBristol tree sponsorship program which need to be addressed.

A request was made for a specific biodiversity or nature recovery strand of CIL.

One comment made reference to an alternative approach to CIL for purpose built student accommodation in the London Borough of Southwark, in which enhances the potential for student accommodation to be delivered in partnership between universities and developers, and which would co-ordinate overall provision.

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 37 Comments from statutory bodies and partnerships

Consultee	Reference
Sport England (1): Sport England supports use of planning obligations as a way to secure new or enhanced places for sport and a contribution to meet their future maintenance. States that all new dwellings in the Plan Period should provide for new or enhance existing sport and recreation facilities. States that the existing evidence base for sport should be maintained to inform the IDP and/or CIL Reg 123 list. Need to be mindful of s106 regulations that restrict up to 5 schemes contributing to a single project and that there may be changes to those regulations in the future.	422
<p>South Gloucestershire Council (1): We consider that there is a need for BCC and SGC to work cooperatively on supporting infrastructure in relation to new housing growth in the north and east of Bristol as the need is identified and additional capacity is planned.</p> <p>Education provision. In relation to education provision we consider that there is a continuing requirement for Bristol City Council and South Gloucestershire Council to work co-operatively to identify the impact of new housing growth on the strategic need for additional and new mainstream and special school places focused on areas that experience cross boundary movement of children. It is important to note that this does not absolve either authority from their duty to secure sufficient school places for everyone who needs one. It is also important to recognise that the operation of admission policies for own admission authority schools and a varying commissioning routes for new school provision inevitably will challenge the councils' ability to agree a coordinated approach.</p> <p>Bristol Arena. We would welcome the identification of the Brabazon Hangar at Filton as the preferred site for the Bristol Arena to provide certainty in the planning of the new residential development and associated transport infrastructure at Filton Airfield.</p>	610
Natural England (1): Natural England considers this policy quite broadly worded and appears to include potential to contribute to some green infrastructure such as parks. Suggest it might be clearer to incorporate other GI, and specifically the strategic approach to mitigation for effects on European sites being developed for West of England JSP and need for developer contributions to support them.	820
Environment Agency (1): Reference to be made to provision of flood risk management infrastructure. Please see earlier comments.	964

25. Section 6: Urban Living

Overview: In total, 9 respondents made comments regarding the introduction of the Urban Living Section, which sets out the general principle of Urban Living and references the Urban Living SPD. Key themes, including the proportion of support, object or neutral are identified in the table below.

Table 38 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General Principle of Urban Living</p> <p><i>Comments in support (2):</i> Two comments expressed general support for the Urban Living principles and approach. However, it was queried whether previously developed land could realistically deliver the housing numbers and mix required in Bristol. One comment also stated that this approach does need to be balanced with protecting green space and increasing biodiversity. It was queried whether this approach also includes office to residential conversion, which is generally poor-quality housing.</p> <p><i>Comments neither support nor objection (3):</i> One comment raised concern that the assertions of housing delivery through brownfield sites in the Bristol JSP Topic Paper 7 (Urban Living) are very optimistic, particularly with regard to density and level of provision. Concern was expressed over the assumption that all of the sites will come forward in their entirety and at the optimal density, despite there being no testing of whether this could be accommodated by the market.</p> <p>Two comments stated that Community-led Housing (CLH) can deliver densities in the Urban Living SPD, for example as multi-storey apartment blocks, and should therefore be actively included in masterplans where this policy applies.</p>	420, 632, 830, 842, 858, 904
<p>Urban Living SPD</p> <p><i>Comments in objection (2):</i> Two comments objected to the Urban Living SPD which it considers sets standards and requirements which could have a negative effect on the supply of housing and affordable housing, due to a lack of evidence or consideration of viability. It is requested that the Urban Living SPD is revoked and any standards/requirements in it applied instead through the Local Plan Review which is subject to Examination.</p> <p><i>Comments neither support nor objection (1):</i> One comment expressed reservations about referencing the Urban Living SPD in policy supporting text (para 6.8).</p>	816, 893

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 39 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Highways England (1): Comment in support of the need and the benefits of using previously developed land to provide the means of developing the majority of housing and employment requirements across the city. Highways England also support the provision of intensive forms of development close to locations with good public transport, cycle and walk links to employment and other service provision locations.</p>	Ref 632

26. UL1: Effective and efficient use of land

Overview: In total, 54 respondents made 64 comments regarding policy UL1 effective and efficient use of land. Key themes are identified in the table below.

Table 40 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle: Comments in support (27): Many comments expressed general support for the principle and aims of this policy, which one respondent referred to as a 'bold' approach. The emphasis on delivering high quality, and well-designed high-density developments was also welcomed.</p> <p>Of those in support, one respondent commented on the need for the capacity of urban living sites to be realistically assessed to ensure that housing numbers can be achieved without detrimental impact on residential amenity or character and historic fabric of the city. It was noted that the ability of Bristol to meet its housing requirement on brownfield sites will need continued discussion in the JSP Examination prior to outcomes being reflected in the Local Plan Review.</p> <p>Other comments in support considered that:</p> <ul style="list-style-type: none"> • Support for the policy was expressed in relation to the following specific sites: St Philip's Marsh, Frome Gateway, Central Bedminster, Bedminster Green, Temple Island, Prewett Street Site, Redcliffe Quarter, Bristol City Centre, Temple Quarter. • Several comments in support also stated that the application of this policy through the Development Management process should be undertaken in accordance with the 2019 NPPF (para 123c). • One respondent stated that Diagram 6.1 could be clearer to determine boundaries of different areas of urban living. One respondent supported the policy for being clearer than the adopted policy BCS10. • One respondent requested that the policy recognise that mixed use is not always appropriate within single buildings and recognises related issues such as providing multiple cores, separating uses, duty of care, services and parking in providing mixed use in such circumstances. <p><i>Comments in objection (2):</i> Several comments in objection stated that the policy should include the proviso that weight should be given to the specific impact on the existing population when considering 'optimum density', such as parking, and should consider the needs of the development, such as access to public and active transport, parking, air quality, open space. Reference to the lack of radial bus routes and access to public transport in North Bristol was made.</p> <p><i>Comments neither support nor objection (17):</i> Several comments on the policy requested amendments to the policy. These were:</p> <ul style="list-style-type: none"> • Explicitly stating that previously developed land is a priority for development; • Including a reference to climate change mitigation in development; • A higher minimum density for development over 20 units; • The inclusion of the temple quarter enterprise zone in diagram 6.1; and • The need to include employment and retail in the policy, as per paragraphs 117 to 123 of the NPPF, which state 'effective use of land for homes and other 	<p>216, 322, 420, 491, 524, 604, 605, 612, 619, 621, 631, 647, 648, 656, 657, 671, 672, 812, 816, 817, 818, 819, 821, 825, 830, 836, 839, 841, 846, 855, 866, 873, 876, 877, 878, 882, 884, 885, 887, 888, 890, 891, 892, 893, 907</p>

Key Themes	Respondent References
<p><i>uses'.</i></p> <p>Two comments requested clarification on office to residential conversion as a means of high density development, stating that this form can often result in poor quality residential accommodation. One comment stated a preference for Green Belt development because of concerns about the poor quality of high density development, which it was considered is often felt most by poorer people.</p> <p>One comment stated the need for the policy to recognise the suburban nature of the 'outer areas' of Bristol, where large gardens are common. Another comment queried that the policy applied only to previously developed land and Growth and Regeneration Areas. Another comment stated that the policy should encourage density through other means than high rise.</p> <p>One comment considers the policy a mandate for high-density development but states that it is important that the city character is supported by variety and should be balanced with protecting green space and biodiversity. Another comment stated the need for a wide range of sites available to meet housing needs due to the often-complex delivery process of higher density schemes.</p> <p>One comment stated that the policy fails to recognise potential for multi-functional use of development space by incorporating infrastructure into development to provide urban living benefits. It stated that by integrating ecological functionality and services, developments can provide food production, ecological connectivity, water conservation/management/ regulation and related quality of life improvements for local communities. It was suggested that the policy is amended to include this point.</p>	
<p>Locations for efficient use of land</p> <p><i>Comments in support (2):</i> Two comments were in support of more intensive forms of development in the city centre, Temple Quarter, St Philip's Marsh and locations close to public transport links/local centres.</p> <p><i>Comments in objection (3):</i> Two comments stated objection to the proposed Outer Urban Area (More Intensive) designation centred on Shirehampton railway station, as the proposed area includes the Lamplighter's Marsh Nature Reserve, the Daisy Field, and the Lamplighter's Open Space listed in Bristol Local Plan Review: New protection for Open Space as LGS02003, LGS02009, and LGS02004.</p> <p>One comment objected to the supporting text in para 6.9, as it is not considered acceptable to base development on walking distances to public transport in areas where there is no public transport provision, for example at Harry Stoke where there is only MetroBus. Concern raised that this situation could occur with the Lockleaze and Whitchurch housing developments.</p> <p><i>Comments neither support nor objection (10):</i> Several comments made comments that were neither for nor against the content of the policy, including:</p> <ul style="list-style-type: none"> • Several comments stated that Diagram 6.1 is not clear enough with regards to defining boundaries for different forms of development density. • Two comments suggested that the 400m walking distance parameter stated in 	<p>100, 116, 491, 619, 646, 696, 811, 812, 819, 825, 827, 829, 887, 888, 905</p>

Key Themes	Respondent References
<p>paragraph 6.9 is too restrictive and suggested alternatives, including 800m (as per the Manual for Streets published by the Department for Transport in 2007), or a staggered requirement of 400m for local bus services, 600m for rapid transit services including the Metrobus and 800m for rail services.</p> <ul style="list-style-type: none"> • One comment stated that all allocations in the Site Allocations document should be acknowledged as suitable for more intensive forms of development, not just Growth and Regeneration Areas. • Requests were made for the inclusion of the University of Bristol precinct for suited to 200dph minimum density and for the inclusion of the Avon New Cut. One comment stated that Stokes Croft could accommodate development of 10-12 storeys if done so sensitively and could make a significant contribution to housing. • One comment stated that urban living at St Philip's Marsh should protect existing employment. Another comment stated that brownfield sites should allow for development of family housing not just apartments through the density policies. • One respondent raised concern that Bristol City Council are not working through the Duty to Cooperate to provide that adjacent authorities take on a greater proportion of Bristol's housing needs. 	
<p>Tall buildings for efficient use of land</p> <p><i>Comments in support (1):</i> One comment supports the principle of tall buildings in the right locations, which could help both achieve the plan housing requirement but also help to viably facilitate site preparation works and infrastructure requirements in central locations.</p> <p><i>Comments in objection (1):</i> One comment objects to the principle of tall buildings at Knowle West.</p> <p><i>Comments neither support nor objection (2):</i> One comment raised concern that tall buildings are known to have harmful consequences for the health and well-being of residents and that the promotion of tall residential buildings is contrary to the aims of Thrive Bristol. Where greater density is required, the respondent supports low and mid-rise developments (up to seven storeys). A second comment state that Stokes Croft could accommodate development of 10-12 storeys if done so sensitively and could make a significant contribution to housing.</p>	<p>316, 616, 696, 852</p>

27. UL2: Residential densities

Overview: In total, 41 respondents made comments regarding policy UL2 Residential densities. Key themes have been identified as follows:

Table 41 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle:</p> <p><i>Comments in support (17):</i> Most comments expressed general support for this policy in principle and considered minimum density thresholds to be essential to delivering the housing requirement.</p> <p>It was commented that the policy should have a specific reference to 'liveability' to make it clear that optimisation is a balance between liveability and density. It was also commented that the policy should seek development in Growth and Regeneration Areas to exceed minimum density thresholds to maximise efficient use of land in suitable locations.</p> <p>It was stated that higher densities can be achieved whilst maintaining good design standards, while another comment was made in support of tall buildings to deliver higher density.</p> <p>Support for the policy was expressed in relation to the following specific locations: Temple Quarter, Prewett Street, Filwood House, Bedminster Green.</p> <p><i>Comments in objection (3):</i> One comment stated that policies on density should be less prescriptive and state that applicants should seek to optimise density and reflect housing need, however all sites will be considered on a case-by-case basis. Considered that 50dph minimum is not appropriate to all sites.</p> <p>One comment objected to the proposed density at the Western Harbour (DS4) due to historic significance in the area and need for conservation. It considered that the policy implies that the Western Harbour will accommodate the tallest buildings possible due to its city centre location and proximity to Metrobus.</p> <p>One comment in objection stated that the policy should include the proviso that weight should be given to the specific impact on the existing population when considering 'optimum density', such as parking, and should consider the needs of the development, such as access to public and active transport, parking, air quality, open space. Reference to the lack of radial bus routes and access to public transport in North Bristol was made.</p> <p><i>Comments neither support nor objection (10):</i> Several comments requested clarity on the provision in the policy that in some circumstances, it would be acceptable for development to be under the minimum required density, in particular when taking into account the "special interest and character of the area. One comment stated that if this is referring to Conservation Areas or places with higher concentrations of Listed Buildings and heritage assets, it should be specifically stated in the policy to avoid ambiguity, however the policy should not attempt to provide statutory protection to areas that are not designated heritage assets. One</p>	<p>85, 490, 491, 524, 603, 604, 612, 632, 657, 671, 672, 812, 821, 825, 836, 839, 840, 841, 852, 866, 870, 872, 877, 878, 882, 885, 888, 890, 892, 893, 894</p>

Key Themes	Respondent References
<p>comment stated that the policy text should be restructured and the minimum density exceptions clearer for applicants. It was commented that sites excepted from the minimum density should also be assessed on a case by case basis to determine if this is appropriate. It was considered to be helpful to add to the policy a recognition that development different to its surroundings may not always be unacceptable or harmful.</p> <p>Some comments raised concern that the policy would not deliver the right sort or amount of housing. One comment considered 50dph as a minimum to be too low to deliver the housing need, while another considered that the setting of minimum densities may not provide a variety of typologies to meet the housing needs of different groups. It was stated that there will be a need for viability assessment of the inter-relationship between density, house size and standards, house mix and developable acreage. It was commented that the setting of residential density standards in the Plan should be undertaken in accordance with the 2019 NPPF (para 123).</p> <p>One comment supported higher densities near public transport, while another comment stated a need for a specific policy on parking and the approach to be taken to on-street parking in urban living locations. This was considered to be important in achieving ambitions of lower car ownership and use.</p> <p>One respondent considered that the setting of minimum densities is contrary to the concept of optimising density, which should be based on the type of site and be location specific, as well as based on good design. It was also considered that the definition of 3 broad areas is so broad that they are meaningless.</p> <p>One comment considered that the policy may be biased against residents of deprived areas who are less vocal or represented and live in areas which may be seen to have less character and heritage assets but will still have 'special interest' to those residents. The respondent stated that these areas should not be penalised if other areas are perceived to have more worth, and that these areas often already have higher densities and overcrowding. It was suggested that areas with low density should be expected to accommodate higher densities such as Clifton, where high quality and well-designed development could increase density in an acceptable manner. It was considered this approach would result in a more inclusive and less segregated city.</p>	
<p>City centre density: <i>Comments in support (4):</i> Comments expressed general support for the principle of a minimum density requirement in this location, with one comment stating that this could be higher than 200dph.</p> <p><i>Comments in objection (1):</i> One respondent considered that the setting of minimum densities is contrary to the concept of optimising density, which should be based on site and be location specific, as well as based on good design. It was also considered that the definition of 3 broad areas is so broad that they are meaningless.</p> <p><i>Comments neither support nor objection (4):</i> One comment suggested that 300dph</p>	<p>420, 619, 631, 632, 637, 646, 647, 648, 816, 818</p>

Key Themes	Respondent References
<p>would more accurately reflect delivery in city centre area, while another suggested that an expectation to exceed the minimum threshold should be stated explicitly.</p> <p>One comment stated that building at urban living densities could jeopardise the future needs for local renewable energy generation (i.e. using house roofs, building facades, small spaces on street corners) and that it must be ensured that land for renewable energy production, or carbon capture have an efficiency value as high as those of development density.</p> <p>One comment stated that the phrasing 'densities below the minimum should only occur where it is necessary to safeguard the special interest and character of an area' is not sufficiently robust for planning decisions, and that judgement of this element of the policy would be highly subjective. It stated that wildlife, biodiversity or climate change mitigation should also be a factor in considering densities below the minimum.</p>	
<p>Inner urban area: <i>Comments in support (1):</i> One comment supportive of the inclusion of the City Gateway site within the "Inner Urban Area (More Intensive)" where a minimum density of 120 dwellings per hectare will be sought.</p>	632

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 42 Comments from statutory bodies and partnerships

Consultee	References
<p>Highways England (4)</p> <p>Comment that there is no specific policy relating to the provision of parking and the approach to be taken to on-street parking in the vicinity of 'Urban Living' allocations. Consideration of the areas surrounding the 'Urban Living' allocations will be important in achieving the ambition of lower car ownership and use.</p> <p>Comment on suggested minimum densities for City Centre; Inner Urban and Outer Urban areas (Draft Policy UL2). Request for a more refined assessment to predict the impact of 'Urban Living' allocations on the local and strategic highway network for the Local Plan.</p>	Ref 632

28. Section 7: Housing

Overview: In total, 11 respondents made comments that related to the content of the Housing section of the Local Plan Review, and which were not directly attributable to any one policy.

Table 43 Summary of consultation responses to elements of the Policy

Key themes	Respondent References
<p><i>Comments neither is support nor objection (11):</i> Comments included suggestions of, and requests for, greater reference to:</p> <ul style="list-style-type: none"> • Implications of housing mix on supporting infrastructure (i.e. the need for car-parking in low density family homes to overcome the challenge of access to education and healthcare). • Visibility of the SHLAA process, in particular, whether the draft and existing allocations will be included within this. • Integration of references to ecological functionality and services into housing policies, including the impact development can have on food production, ecological connectivity, water conservation management and regulation. • Infrastructure to support vehicle dwellers, and greater reference to inclusive housing development including for homeless people, vulnerable people (Vulnerable Persons Resettlement Schemes), asylum housing or refugee resettlement schemes (National Asylum Support System). • The need to support conversion of existing empty properties into housing (including empty high street stores) rather than simply focussing on new development. • References to currently unregulated short-term tenancies (such as AirBnB), for which one comment considered should be the subject of the SPD. <p>In relation to process, one comment suggested engagement was necessary around housing policies (such as affordability and housing mix) to ensure greater cohesion and greater transparency around decision-making.</p>	<p>76, 85, 109, 193, 605, 751, 756, 786, 807, 871, 878</p>

29. H1: Delivery of new homes

Overview: In total, 50 respondents made 62 comments regarding policy H1 Delivery of new homes. Key themes are identified in the table below.

Table 44 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>Delivery of new homes - housing numbers:</p> <p><i>Comments in support (10):</i> Support for the delivery of 33,500 new homes was raised by ten respondents, who particularly valued references to the target being a 'minimum' and the aspiration to 'exceed' this. Others in support appreciated that there was no cap placed on the delivery of homes within the plan.</p> <p><i>Comments neither in support nor objection (16):</i> While accepting the need for new homes and supporting the minimum target for delivery, a number of respondents considered that the target should be sufficiently flexible to enable revision following the outcomes of the Joint Spatial Plan examination.</p> <p>Several respondents commented that there was insufficient consideration given to the impact of this scale of housing development on infrastructure provision, including transport, healthcare, education etc. Reflecting on historic urban expansions, other similar comments raised that the delivery of new homes through urban living principles cannot be considered in isolation from achieving good place-making and support the fostering of cohesive communities. Two respondents considered that there was insufficient reference within the policy and supporting wording to specific housing types, including modern housing tenures such as build-to-rent or co-living.</p> <p><i>Comments in objection (5):</i> There were five comments that were explicitly objecting to the wording of this policy. The majority of these comments considered that the target was too low and did not account for the objectively assessed market and affordable housing need for Bristol until 2036 – suggesting that it is neither sound nor sustainable to not achieve the target in line with the MHCLG standard methodology. Commenters suggested that the target should be in the order of 48,000 new homes, arguing that the current under-estimation arises from overly conservative approaches to improving housing affordability, low economic growth assumptions and no 'policy-on' adjustments to ensure the delivery of affordable housing – which will be exacerbated through under provision. Again, responses considered that the outcomes of the JSP examination would be critical in determining the correct housing needs figure. Argue that additional sites for residential developments should be allocated to ensure a 5-year housing land supply, or a review period should be included within the policy.</p> <p>Two respondents were concerned at the ambition to exceed housing numbers, particularly for the implications this would have on the environment or infrastructure. This was of greatest concern in areas of the City which had already received higher levels of growth through the Core Strategy.</p>	<p>104, 316, 322, 405, 420, 490, 491, 560, 603, 608, 616, 635, 646, 672, 799, 801, 812, 818, 830, 836, 839, 840, 841, 845, 852, 866, 888, 890, 892, 893, 958</p>
<p>Providing affordable homes</p> <p><i>Comments in support (2):</i> Two comments in support of this policy –wording considered that affordable housing is a key objective of the Plan and should</p>	<p>316, 420, 437, 446, 490, 603, 626, 646, 656,</p>

Key Themes	Respondent References
<p>transcend all policies. Where in conflict with other elements of the Plan or the cumulative impact on viability of obligations, these comments advocated support for affordable housing taking precedence.</p> <p><i>Comment neither in support nor objection (29):</i> Comments regarding the policy-wording and process were as follows:</p> <ul style="list-style-type: none"> • Deferral of the policy to the JSP and interim requirements: Several comments considered that the lack of specific policy on affordable housing provided significant uncertainty regarding expectations. Whilst a small number of comments stated that reliance on the Affordable Housing Practice Note in the interim was unsound, arguing that it does not reflect the latest position in the SHMA 2018, others valued the AHPN 2018 noting that it secured more timely delivery of affordable housing across the city. • Untested viability: Whilst generally supportive of the principle of providing affordable housing, the majority of unclear comments were in relation to the viability-testing the blanket policy requirement. Greater viability testing in line with para 34 and 57 of the NPPF was needed particularly in respect of different affordable housing typologies – such as brownfield city centre sites. Comments in this regard considered that the viability implications of a minimum 35% requirement is compounded by other policy requirements that would seriously undermine the delivery within Growth and Regeneration Areas. • Unclear definition: Two respondents considered the need for the definition of affordable housing to be amended in line with the new NPPF: proposing that social rent homes are deemed “truly affordable”, whilst below-market rate housing are clearly marked as “less affordable”. Reference was made to the Shelter UK definition of affordable definition of 35% of net household income. • Higher target and enforceable: Three comments specifically advocated a higher requirement between 40-45% affordable housing in South Bristol, and requested that this is expressed as a minimum. Several other comments considered that this requirement needed to be enforceable and clearly articulated from the adoption of the policy, to prevent viability arguments undermining delivery later in the development management process. • Application to other housing types: One comment indicated that policy should be extended to include DC1 ‘Liveability in residential development including space standards’ and draft Policy H8 ‘Older peoples’ and other specialist needs housing’. • Site size threshold: One comment considered that affordable housing contributions should not be sought for non-major developments, as this is unlikely to be financially viable, unjustified and inconsistent with national policy. One policy considered that there is a need to retain Policy DM3 (Affordable Housing Provision: Smaller Sites) and BCS17 (Affordable Housing Provision). 	<p>672, 700, 751, 753, 793, 799, 807, 811, 812, 818, 821, 825, 830, 844, 878, 880, 885, 888, 893, 894, 895, 963</p>

30. H2: Preventing the loss of residential accommodation

Overview: In total, 6 respondents made comments regarding policy H2 Preventing the loss of residential accommodation. Key themes, including the proportion of support, object or neutral/unclear are identified in the table below.

Table 45 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy H2</p> <p><i>Comments neither support nor objection (6):</i> All respondents were generally in support of the overall principle of the policy, however were concerned that the policy should be strengthened to prevent the loss of family and key worker housing to short-term lets and student accommodation. Considered that the policy should also reference the need to address balance in these areas as a means to reverse the impact on local businesses suffering from a transient community too.</p> <p>Comment considered that there should be greater definition around whether a dwelling was being operated as a business and that use of dwellings for short-term lets (such as AirBnBs) should be considered as a change of use and be subject to business rate, taxation and licensing. One comment requested that the policy referred to the Greater London short-term letting regulations, as an example of this.</p>	273, 405, 429, 603, 608, 621

31. H3: Making the best use of site allocations

Overview: In total, 18 respondents made 19 comments regarding policy H3 Making the best use of site allocation. Key themes are identified in the table below.

Table 46 Summary of consultation responses to elements of the Policy

Key Themes	Theme References
<p>General principle of policy H3:</p> <p><i>Comment in support (5):</i> All five comments supported the concept of seeking to exceed the capacity stated within existing adopted allocations. One comment suggested that a lower capacity should be appropriate, if following further technical work, this is not considered to be feasible. For sites currently allocated for mixed use, one comment suggested that it was appropriate to ensure that residential dwellings are the dominant use.</p> <p><i>Comments neither in support nor object (9):</i> Respondents considered that references to aiming to 'exceed' or 'be consistent with minimum density' policies were not always appropriate, and that these should not be pursued without consideration of whether developments will create sustainable, well-balanced and supportive communities. Greater clarity was requested in the form of:</p> <ul style="list-style-type: none"> • Definition of allocated sites and whether these include Growth and Regeneration Areas can be considered as allocations; and • Definition of 'overriding need' for uses and what is meant by 'essential community facilities'. <p>One response considered that the policy should be extended to protect adopted employment allocations in the same way, whilst two responses considered that the definition of housing within the policy should be expanded to include all forms of accommodation, such as student accommodation, hotels and residential with workspaces. One response considered that it is necessary for the Bristol Local Plan Review to include a mechanism for the sites within the emerging JSP too, and whether these will be treated as existing 'retained allocations' if this were to be adopted.</p> <p><i>Comments in objection (2):</i> One response objected to the possibility that the number of homes on sites already allocated could be increased, particularly if this is through taller buildings. One comment considered that the policy was overly restrictive and did not take account of changing market conditions. It was not considered reasonable to request that higher densities were pursued, whilst preventing allocated sites from developing differently from previous allocated.</p>	420, 491, 603, 608, 661, 671, 817, 829, 830, 873, 876, 885, 887, 892, 893, 894
<p>Retained site allocations: One respondent provided comment on allocated site (BSA1202), which stated that original master-planning work was undertaken based on a full appraisal of site opportunities and that allocation of 300 homes on the site was reasonable.</p>	661
<p>Site Specific</p> <ul style="list-style-type: none"> • One respondent argued that Central Fishponds has the potential to accommodate more homes given housing need and the approach to making effective use of land, particularly on brownfield sites. • One respondent objected to the policy if it meant an increase in housing numbers within the Knowle West area. 	839 616

32. H4: Housing type and mix

Overview: In total, 32 respondents made 34 comments regarding policy H4 Housing type and mix. Key themes are identified in the table below.

Table 47 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of H4:</p> <p><i>Comments in support (7):</i> Three comments supported how development should contribute to a mixed and varied supply of housing, including explicit acknowledgement for optimising density, existing housing profile, local housing requirement, local imbalances and site-specific characteristics as appropriate considerations. Viability was also referenced as a factor to be added to the policy. One comment supported the policy for re-introducing principle of community balance, as currently identified within adopted policy BCS18.</p> <p><i>Comments neither in support nor object (24):</i> Of the 5 respondents that were broadly in support of the policy-wording, these generally requested that the policy was strengthened in terms of restoring balanced, mixed communities and to addressing areas with existing excess concentrations of one dwelling type (i.e. student dwellings). Over-concentrations of specific housing types (i.e. student housing) were considered to leave the local economy vulnerable through a lack of mixed use.</p> <p>In relation to the definition of mix, there was one comment that considered it would be helpful to have a 'housing types target' of what constitutes a balanced community, with one comment suggesting that mix should respond to market signals within the area. One comment considered that securing a mix of housing should be a key objective, but it needs to be underpinned by empirical evidence of housing need and existing types in different parts of the city to remove ambiguity. One comment suggested that the evidence of need should be demonstrated through an Equality Impact Assessments. Finally, three comments required additional clarity in the definition of a 'balanced community', or removal of this reference.</p> <p>One comment considered that a mix of housing has a bearing on deliverability and viability of the site and therefore a flexible approach, without specific reference to a target, should be applied to responding to the needs of the community. Three comments considered that detail on housing mix and any reference to targets should not be relegated to an SPD, spatial framework or similar as this was a Plan-led issue (citing court cases).</p> <p>Two comments requested removal of the 'need to redress any harmful housing imbalance that is existing in the area' as it should not be the responsibility of a new proposal to resolve any existing housing imbalance. One comment considered that it was not clear whether the policy is seeking that development conform to the existing profile of the area or seek to vary it.</p> <p>There were several comments in relation to explicitly referencing different housing types within the policy, including:</p>	<p>216, 273, 322, 405, 420, 428, 491, 603, 605, 608, 621, 626, 631, 639, 646, 647, 648, 672, 751, 807, 812, 818, 819, 829, 866, 870, 888, 891, 893, 894, 895, 958</p>

Key Themes	Respondent References
<ul style="list-style-type: none"> • Different groups within the community that are not necessarily evident in localised need e.g. older people and people with disabilities; • Build for Rent, which should be linked to opportunities for economic development; and, • Retail units or smaller business premises as another means to ensuring mixed and balanced communities. <p>One comment considered that developments shall demonstrate multi-functional use of development space by incorporating infrastructure (green, ecological, hydrological, transport, service) and demonstrating overall sustainability for positive community impact. One respondent requested retention of BCS18 to underpin Policy H4.</p> <p><i>Comments in object (1):</i> One respondent objected to proposals for 'optimising density' as this would generally result in smaller homes.</p>	
<p>Growth and regeneration areas: Two comments were made explicitly in relation to the Growth and Regeneration Areas, including:</p> <ul style="list-style-type: none"> • One comment in support of applying this policy in Bedminster Green, citing a large over-concentration of 1 and 2 bed development. Consider that the policy would benefit from evidence to demonstrate what a 'balanced' community consisted off within this area. • One comment was made in relation to St Philip's Marsh, requesting clarity about how appropriate mix will be determined in areas where there is little existing residential development. 	627, 631

33. H5: Self-build and community-led housing

Overview: In total, 53 respondents made 106 comments regarding policy H5 Self-build and community-led housing. Key themes are identified in the table below.

Table 48 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy H5</p> <p><i>Comments in support (23):</i> Those comments in support generally valued the positive and proactive nature of the policy wording, including the identification of site allocations. Several comments requested clearer reference to the requirements of the NPPF, the Self-build and Custom House-building Act (2015) and the Council's Self-building Register within the policy wording. Attention was also drawn to the emerging national commitment to deliver a Right to Build.</p> <p>Of those in support, one respondent considered that the policy needed to be strengthened with more proposed allocations (i.e. around 20-40 homes and covering a range of sites / inclusive housing types) and the targets needed to be increased. A number of precedents are provided to support the argument, including Teignbridge, Cherwell and Cambridgeshire. A number of comments suggested that specific reference should be made to existing self-build initiatives operating within Bristol as examples of good practice (such as We Can Make).</p> <p>Two comments in support also requested greater clarity in relation to how Community-led Housing (CLH) will be delivered. One comment requested greater clarity regarding 'encouragement' of CLH; questioning if this means community-led will be favoured over market-led speculative schemes.</p> <p><i>Comments neither in support nor object (14):</i> Comments were made as follows:</p> <ul style="list-style-type: none"> • Definition: One comment considered that the focus of the policy was too narrow and assumed that the Self-Build and Custom Housebuilding Act only applied to individual or community groups. Suggest that a better title for H5 would be for 'Self- Commission' which would enable better consumer choice. Other comments considered that CLH and self-build housing definitions should be clearly set out, whilst another cautioned the grouping of self-build or custom-build housing with co-operative housing, given these have different financial and governance structures. • Source of sites and size: Two comments considered that the focus should be on smaller overlooked sites or very small urban sites owned by the Council, as opposed to specific self-build allocations. Consider that preferences for sites are often on individual plots in rural locations, as opposed to plots on larger sites. One comment considered that the sources of sites should only be those where there is support from the landowner, whilst another considered it was not appropriate to require a blanket requirement as not all sites lend themselves to serviced self-build plots. • Density: One respondent commented concern regarding the interface between density policies, the requirements of the self-build register and policy H5. • References to wider environment benefits: One respondent considered that the policy should work harder to ensure that self-build housing should deliver 	<p>11, 56, 129, 192, 373, 420, 465, 605, 608, 610, 611, 615, 616, 621, 635, 646, 647, 672, 698, 747, 748, 751, 789, 792, 793, 800, 807, 811, 812, 839, 842, 845, 866, 873, 888, 892, 893, 904, 963</p>

<p>broader community, ecological and quality of life benefits when compared to 'conventional' developer-led housing.</p> <ul style="list-style-type: none"> • Assessment of demand and evidence for targets: Two comments considered that BCC should provide a robust assessment of demand including an assessment and review of data held on its register, with demand for evidence behind the targets in the policy. One respondent considered that the policy approach should include a mechanism or trigger to ensure that self-build plots can be delivered and do not remain unsold if there is no demand. One comment indicated that more needed to be done to ensure that self-build schemes were accessible to deprived communities (including subsidising land). A final comment considered that it is reasonable to suppose that many people who have not previously considered self-build or community-led forms of development may choose to do so if more plots were available – there may be a high level of latent demand in Bristol, but there was no evidence available to test this. • Viability: Several comments indicated that requirements of the policy should be viability tested throughout, to ensure that there was no risk to affordable housing delivery and to ensure that value expectations of CLH are clear. These respondents indicated that provision should only be required where it is viable and deliverable. <p><i>Comments in objection (2):</i> Two comments were strongly in objection. These considered that there is no evidence of need or viability provided to justify the policy.</p>	
<p>Self-build site allocations</p> <p><i>Comments in support (11 inc. sites):</i> There were several comments in support of specific allocations for self-build and community-led housing., of which a number made specific comments in relation to existing proposed or suggestions of new sites (see list below).</p> <p><i>Comment neither in support nor objection (14):</i> One respondent considered that there is no good reason to restrict all self-build / community-led site allocations to only those out of centre, relatively small, and likely to be residential in nature. Another two respondents considered that there was insufficient emphasis on brownfield sites across the city, whilst a third perceived that community-led schemes were only attained in the Plan through incremental loss of green spaces.</p> <p>Two respondents considered that there are too few schemes allocated for community-led development, and the proposed allocations either have planning consented or schemes developed (i.e. Bridge Farm or Land at College Road), are very small (i.e. land at Cousins Road) or are unlikely to become available (i.e. Stapleton Cricket Ground). One respondent suggested that references should be expanded to include "any site where self-build will be acceptable" which may be sites that are close to existing local facilities or which are known to be in demand for CLH or self-build. One respondent considered that if Community-led Housing is not coming forward by the next plan review, then the allocation should be revisited.</p> <p>One final respondent considered that ecological enhancement of a CLH should be endorsed to open up viable land opportunities for eco self-build communities, evidenced through Ecology Calculator of Code for Sustainable Homes. Several</p>	<p>129, 192, 373, 420, 611, 635, 646, 647, 648, 656, 657, 694, 698, 699, 729, 747, 748, 751, 789, 792, 793, 842, 844, 880, 882, 893, 904</p>

<p>comments were made in relation to the overall viability-testing of this policy.</p> <p>Site-specific comments</p> <ul style="list-style-type: none"> • Bridge Farm, Glenfrome Rd, Eastville, Support (4) four respondents fully endorsed policies on self-build and affordability. • Land at College Rd, Fishponds: Support (1) one respondent was in support of Land at College Road. • Stapleton Cricket Club, Park Rd, Stapleton: Object (1), one respondent objected to the allocation of the site for self-build. • Cousins Lane, St. George: No comments were directly made in response to the allocation of land at College Road for CLH or self-build housing. • Suggested sites: There were a number of comments which suggested the addition of sites, including: <ul style="list-style-type: none"> ○ One comment stated that additional sites should specifically be allocated for self-build, custom-build or community-led approaches, including Glencoyne Square, the play-area at Embleton Road, Southmead, and Greystoke Avenue, Southmead. ○ Five respondents considered that the following sites should be promoted for self-build or community-led development: BDA 0101 (Wallace Estate – Ashley Vale) (Community led mix use), BDA 0703 (Marmalade Lane), BDA 1304 Rose Green Road), BDA2402 (East of Romeny Avenue), BDA 2403 (Gas works on Glenfrome Road), BDA 2502 (Cossins Road, Redland), BDA 2901 (Lanercost Road) and BDA 3201 (Sneyd Park). ○ One respondent considered that further sites should be identified in south Bristol, specifically on sites such as Hengrove and Hartcliffe Campus, and another respondent encouraged the Council to allocate additional sites in Lockleaze. ○ Two comments considered that suggested sites should be those which are close to existing local community facilities, where there is known to be high demand for self-build or CLH, a selection of larger sites for ‘experimental forms’ of housing delivery and those sites where ‘conventional’ models of development seem unlikely to be appropriate. <p><i>Comments in Objection (2):</i> Two respondents considered that there has been no consideration of viability in relation to the 100% self-build sites or provision of an element of ‘standard’ development.</p>	
<p>5% requirement (Green Belt sites)</p> <p><i>Comment in support (3):</i> Several respondents were in support for the 5% requirement on the strategic allocated sites, however some considered that the target was too low.</p> <p><i>Comment neither in support nor objection (8):</i></p> <ul style="list-style-type: none"> • Target was too low: Several respondents considered that the 5% requirement on the strategic proposed allocated sites was actually far too low, accounting for less than 1% of the total new housing provision needed in the city. This shortage would be compounded should one of these sites not be delivered. Two respondents considered that the target should be 15% or higher, say, and required by every new housing development instead. • Self-build and Strategic Site Construction timescales: Two respondents were concerned about the requirement for a proportion of self-build as part of a much larger development, noting that as a result of the ‘lag’ in the delivery of 	<p>129, 192, 420, 605, 616, 635, 672, 829, 842, 866, 870, 873, 888, 893, 904, 963</p>

<p>self-build plots this often reduced interested (and viability) of neighbouring regular market plots.</p> <p><i>Comments in objection (5):</i></p> <ul style="list-style-type: none"> • No demand for requirement: One respondent considered that a requirement for a proportion of self-build or CLH should not be sought, as this is unlikely to make a contribution to boosting housing supply. Focus should be on policy-encouragement of house-builders / landowners to engage in self-build or CLH housing types, and reviewing entries on the Self-Build Register. • Insufficient viability testing: Two respondents considered that the requirement was not adequately justified or appropriate, and viability testing in accordance with evidenced local was necessary. It was considered that there needs to be sufficient clauses (i.e. a 12-month marketing clause) in the policy to prevent stalemate situations where there is no interest in the delivery of this type of housing. • Delivery of self-build alongside strategic site market housing: Two comments stated that the policy must consider the practicalities of delivering both market house and self-build on the same site, including working hours, health and safety and length of build programme. Both comments suggested that this requirement should be removed, with only specific self-build allocations being brought forward. 	
<p>Growth and Regeneration Areas</p> <p><i>Comments neither in support nor objection (7):</i> A total of seven respondents made comments in relation to the Growth and Regeneration Areas. In summary:</p> <ul style="list-style-type: none"> • One commented concerned about the interface between unspecified proportions of self-build plots in GRAs and enabling the concept of urban living and high densities. • Five respondents considered that greater clarification was needed regarding the proportion and reasons for justification of the requirement in the Growth and Regeneration areas, suggesting that any proposed requirement for self-build should only be referenced where viable and deliverable. • One comment suggested that the policy needs to highlight organisations that are leading on community-led regeneration, as a means to directing development. 	<p>420</p> <p>647, 648, 656, 657, 883</p> <p>611</p>
<p>Affordable housing</p> <p><i>Comments in support (2):</i> Two comments were in support of removing affordable housing requirements for CLH. Comments considered that clarification is necessary to ensure that private developments cannot remove the affordability requirement by providing self-build or custom build housing.</p> <p><i>Comments neither in support nor objection (3):</i> Two comments requested additional clarification of the Council's definition of self-build /custom-building housing, and its exemption from community infrastructure payments. One comment considered that the Self and Custom Build Register was not a sound basis for setting a specific policy requirement regarding affordability.</p> <p><i>Comments in objection (1):</i> One comment considered that it was unfortunate that this type of requirement was necessary – as it would mean that CLH in Bristol will not be sufficiently affordable for all members of the community</p>	<p>192, 610, 615, 672, 842, 904</p>

<p>Exception sites</p> <p><i>Comments in support (3):</i></p> <p>Two comments broadly in support, considered that the policy should go further allowing a CLH exception test to be applied to any site and additional policy exemptions for this housing type (i.e. allowing these sites to be exempted from optimised density). Another comment in support considered that there should be an opportunity to put forward additional exception sites at this stage (including existing adopted allocation BSA1108 Novers Hill).</p> <p><i>Comments neither in support nor objection (5):</i></p> <ul style="list-style-type: none"> • Redundant community facilities land or buildings: One comment was concerned with how this reference would interface with Policy BCS12 and DM5 – there was concern that this would imply a presumption in favour of redevelopment of these community facilities. • Reserved Open Space: Three comments were concerned with how ‘the proposal is demonstrably supported by the local community’ would be evidenced and the threshold for a ‘deficiency of open space’. Of these, one comment suggested that any development on Reserved Open Space must be community-led for community benefit and result in net gains to biodiversity and nature recovery. 	<p>379, 607, 616, 623, 635, 789, 880, 884</p>
<p>Design and standards, Comments neither in support nor objection (3): Clarity is needed on guidance for self-build and CLH, including measures in place to ensure that plots do not remain vacant (for example a Design Code system or Plot Passports). One comment also considered that space standards should be relaxed for self-build homes, which are designed to meet circumstances of the self-builder.</p>	<p>698, 792, 812</p>

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 49 Comments from statutory bodies and partnerships

Consultee	Reference
<p>South Gloucestershire: Comment that the policy does not seek to actively encourage or support smaller sites, nor does it set out how self-build will actually be delivered on defined allocations. Suggests that the policy would benefit from a definition of what self-build comprises. Query whether it would be possible for a developer to submit a planning application of a custom-build scheme to avoid the affordable housing contribution. Also consider that self-build and custom-build sites should be encouraged to provide affordable housing.</p>	<p>610</p>

34. H6: Homes in multiple occupation and other shared housing

Overview: In total, 30 respondents made 62 comments regarding policy H6 Homes in multiple occupation and other shared housing. Key themes are identified in the table below.

Table 50 Summary of consultation responses to elements of the Policy

Key Themes	Theme References
<p>General principle of policy H6</p> <p><i>Comments in Support (5):</i> These considered that variety of tenure and occupants is essential to attaining a balanced, varied and sustainable community as HMOs form an essential part of housing mix. Two commented support for additional controls over the creation of new HMOs and policies aimed to prevent over-concentration.</p> <p><i>Comments neither in support nor objection (24)</i> included the following:</p> <ul style="list-style-type: none"> • Objection to perpetuating a negative stereotype / anticipated disturbance: Three comments considered that the narrative around HMOs communicates the perception that all HMOs have a negative impact on the local community, however HMOs represent a crucial low-income, affordable source of housing supply. Suggest that HMOs should be re-branded as 'co-living' to remove the negative reputation and to enable this type of housing to support affordable housing and reduce homeless. One comment considered that decreasing the affordability of HMOs was actually displacing people further out of the City. • Addressing existing concentrations: Several comments considered that the policy did not go far enough in addressing existing harmful concentrations and that tighter controls on the growth of HMOs were necessary. • Definition of Homes in Multiple Occupation: Several comments considered that the definition of HMOs needed to be broader to include smaller units being occupied by transient people, all council-tax exempt properties (including Air BnB) and any other temporary housing. Suggest that the policy is amended to reflect the wording of the non-retained Policy DM2. • Definition of 'harm to amenity and character' and 'exacerbation of harmful conditions': Comments noted that these terms had been challenged and were difficult to apply in practice in the previous iteration of the plan; therefore, additional detail was requested to support practical implementation. • Proximity to specialist student accommodation: One comment considered that the supporting text offered no explanation of how student development will be managed within the city centre. • Request for an SPD: Three comments would strongly support the introduction of an SPD in addition to new policies to aid planning officers. • Alignment between Policy H6 and H7: One policy considered that it is not possible to view these policies in isolation; Policy H6 restricts supply of HMOs and Policy H7 demonstrates how PBSA offers an opportunity to take the pressure off the existing housing stock. Suggests that these policies should be combined. • Impact on affordability: One comment considered that by constraining the concentration of HMOs could increase rent inflation by reducing supply, or increase the level of commuting as people travel further into the city centre. • Viability-testing: One comment considered that the policy should be viability- 	<p>19, 20, 216, 405, 424, 429, 465, 571, 603, 608, 610, 621, 622, 629, 643, 756, 797, 811, 832, 846, 870, 880, 892, 894, 895, 907, 913, 963, 964</p>

Key Themes	Theme References
tested and evidenced in accordance with local demand.	
<p>Citywide criteria</p> <p><i>Comments in Support (3):</i> Comments in support valued references to the 'sandwich' policy, however wished for this to be strengthened so that whole streets and terraces could be returned to permanent residential use.</p> <p><i>Comments neither in support nor objection (10):</i> A number of comments were raised in relation to practical implementation of the policy. In summary, requests were for:</p> <ul style="list-style-type: none"> • Reframing policy away from a presumption of likely disturbance: One comment considered that the plan should positively plan for HMO type accommodation with city-wide criteria including: attainable rents, well-managed by an RP, approx. 5 bedrooms and new builds that achieve high standards. • Proximity to specialist student accommodation: One comment was generally supportive of the inclusion of this policy but stated that a robust mechanism needed to be in place to ensure that this was enforced. • Reference to on-street parking: One comment was concerned why there was an unequal approach to flatted development and HMO development in relation to parking. This may result in HMOs being driven towards less sustainable locations where there may be less parking pressure. • Additional criteria: One comment considered that criteria for planning refusal should also include overlooking and loss of privacy. • Sandwich-level assessment: One comment called for the reintroduction of the 2018 Local Plan Review Consultation three tests of HMOs, with another comment suggesting that a neighbourhood level test should instead be applied on the basis of census output areas. One comment considered that the assessment threshold should be reduced to 50m. • Size limits: One comment considered that a maximum number of residents per unit must be enforced to prevent over-crowding with HMOs. 	19, 20, 37, 273, 424, 429, 603, 608, 612, 629, 756, 832, 907
<p>10% threshold</p> <p><i>Comments in Support (3):</i> Comments were in support of a maximum threshold of 10% and support for 100m rule and inclusion of PBSA when considering HMOs.</p> <p><i>Comments neither in support nor object (7):</i> Comments were related to the practical implementation of the policy and the evidence behind the 10% threshold. In summary, the following was considered necessary:</p> <ul style="list-style-type: none"> • More stringent controls: One comment considered that cap on student numbers should be at 60% of the current level, to reduce the impact of over-concentrations within these areas and loss of green space. One comment considered that there should be three tests, including one which tested concentrations at an LSOA area level to prevent higher local concentrations. Proposed that the policy should include a presumption against development if any one test is failed. • Household / population concentration: One comment considered that 10% of the housing stock may actually mean far high proportions of the population (i.e. if HMOs are 6-bed or more), so questioned the extent to which this would actually reduce the concentration of students. • Flexibility: Greater flexibility is needed in relation to the definition of the 	37, 405, 424, 429, 571, 608, 621, 756, 807, 832, 870, 894

Key Themes	Theme References
<p>threshold – stating that it may be higher or lower in other areas and should have explicit thresholds for population / household concentrations and local community cohesion should be measured within this. One comment considered that a more flexible approach was necessary to allow local circumstances to be taken into account.</p> <ul style="list-style-type: none"> • Request for an SPD: Following general support for the introduction of a defined area where HMOs must not exceed 10%, comments suggested that the defined area should be set out within the policy or an SPD. • Evidence and Viability-testing: Question how the 10% threshold has been arrived at as a ‘sound’ policy basis, and the extent to which this has been viability tested. <p><i>Comment in Objection (2):</i> One comment was in objection to the overall vagueness of the policy stating that ‘defined area’ needed more clarification and evidence. One comment considered that the existing policy had not been successful as demonstrating the loss of amenity in an individual application was often not possible.</p>	
<p>Standard of accommodation</p> <ul style="list-style-type: none"> • <i>Comment in support (2):</i> One comment in support of achieving a good standard of accommodation. • <i>Comments neither in support nor object (2):</i> One comment considered that there needed to be an emphasis within the policy on achieving attractive and vibrant places to live. One comment considered that a better standard of accommodation (i.e. soft close fire doors, working doorbells, carpeted stairs and designated waste provision) could reduce the impact of student HMOs on adjacent neighbours. 	405, 424, 429, 756
<p>Site specific: Several comments were raised specifically in relation to areas of the city and HMOs:</p> <ul style="list-style-type: none"> • One comment objected to any further increase in shared-housing and student densities around Marlborough Street, Nelson Street and Baldwin Street. There is a need to address very high numbers of student housing projects in central Bristol. • One comment considered that there was already disruption experienced in Cotham and Redland. There would still be expansion in the number of HMOs in Totterdown, next to the new Temple Meads campus. • Diagram 7.1 should be amended to include the expanded area for the TQEZ. • One comment was particularly concerned about the concentration of student properties and levels of HMOs within the Clifton Down area. 	<p>Ref 216</p> <p>Ref 571</p> <p>Ref 846</p> <p>Ref 37</p>

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 51 Comments from statutory bodies and partnerships

Consultee	Reference
Environment Agency commented their objection to the development of 'More Vulnerable' uses in St Philip's Marsh and Western Harbour, until such time as a Flood Risk Management Strategy with reasonable certainty of delivery is available.	964

35. H7 Managing the development of purpose-built student accommodation

Overview: In total, 113 respondents made 186 comments regarding policy H7 Managing the development of purpose-built student accommodation. Key themes are identified in the table below.

Table 52 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General</p> <p><i>Comments in support (7):</i> There was general support for development of new purpose-built student accommodation (PBSA) to reduce pressure on existing homes and to reduce impacts on existing residential areas. One comment in support suggested that student development must be adaptable to other uses, whilst another supported reference to avoiding areas with a primarily residential context (such as, St Pauls).</p> <p>The University of Bristol (UoB) supported the Council's overall positive approach to addressing identified student housing needs over the Plan Period, which they considered were consistent with the NPPF's requirement to address the specific housing requirements of different groups. By continuing to work with BCC, the University commented that it will be important to ensure that the policy has the flexibility to address changing needs over the plan period. The UoB particularly endorsed the proposed policy approach that requires endorsement of emerging PBSA proposals. The UoB commented that the indicative capacities should be removed, or that additional text be added that confirms PBSA proposals that individually or cumulatively exceed thresholds will be acceptable if they comply with the general requirements set out in the policy.</p> <p>One comment considered that it was positive to note the benefit of student accommodation within the policy, including release of existing city housing stock and revitalising underused buildings and brownfield land.</p> <p><i>Comments neither in support nor objection (29):</i> There were several comments which requested amendments to policies on the basis that existing policies are being challenged by applications or appeals. Several comments requested that policies be strengthened.</p> <ul style="list-style-type: none"> • Amount, quantum of growth, flexibility and demonstrating need: <ul style="list-style-type: none"> ○ Several comments considered that the policy is vulnerable to changes in economy, legislation or social change in relation to higher education. Several comments considered that the policy needs to be sufficiently flexible and robust to ensure changes in UoB business model or strategy could be accommodated (i.e. student numbers cap removal resulted in significant growth of existing universities). One comment suggested that UoB should share their plans for growth to ensure transparency. ○ Several comments noted that the total number of bed spaces in the policy exceeded the 6,400 stated additional level of bedspaces required by UoB. These levels were also considered to be inconsistent with the student numbers set out within each of the DS policies. ○ Several comments considered that the policy is based on a current 	<p>85, 273, 305, 316, 380, 446, 488, 571, 603, 608, 610, 612, 621, 622, 627, 639, 643, 756, 760, 797, 798, 799, 807, 811, 815, 816, 817, 818, 827, 829, 840, 841, 868, 876, 877, 882, 887, 892, 893, 894, 907, 913, 923, 968</p>

<p>estimate of 41,000 students, however evidence exists stating that there are actually 44,830 full time students within the City. References to quantum throughout the policy therefore need to be amended to ensure that these are representative of recent evidence.</p> <ul style="list-style-type: none"> ○ One comment considered that it is important to ensure that the adopted policy approach to PBSA does not unnecessarily restrict supply across the City. ○ One comment considered that additional detail is needed in relation to overall student numbers and type of students coming to the universities (undergrad increase would require greater levels of PBSA and create year on year demand). ○ Two comments requested that UoB must commit to a plan that shows the student market sectors of growth, as currently there is no mandate for them to adhere to their growth strategy. This was considered to be essential in preventing increased pressure on HMO provision. ○ Several comments considered that the policy should reference the current shortfall in high quality PBSA in Bristol (calculated at 25,479 students). These comments suggested that a criteria-based approach would be more relevant to determining PBSA. ○ Several comments considered that the evidence base for capped figures as set out in the defined locations should be published and referenced within policy or supporting text. ○ One comment considered that given the housing crisis in deprived areas of the City, all land for housing should be made available for permanent housing and not student accommodation. ○ One comment considered that student accommodation should be kept at no more than 10% in any area. Caps should be re-instated on university numbers. ○ One comment considered that reference should be made to the impact of growth of students on communities already impacted. ● Flexibility in supply and use: One comment considered that BCC needs to plan for changes in predicted numbers and type of student provision. One comment questioned whether the accommodation could be used differently in non-term-time periods and two comments requested that student development must be adaptable to other uses, which would be environmentally better than having to demolish and rebuild. ● Character of the city: One comment considered that expansion of student numbers in Bristol is likely to be detrimental to the city's character. Several respondents considered that in all locations there were insufficient policy sanctions applicable to the university to ensure compliance with management requirements. A separate comment considered that PBSA can add vibrancy and mix to an area. ● Over-provision of supply: Three comments considered that speculative development should be outright refused or controlled by a presumption of refusal, if this would result in over-capacity or harmful concentrations of PBSA. One comment considered that the policy should focus on addressing a rebalance in supply of PBSA in the inner-city wards. ● Management: Several comments requested that additional reference was made to the management of PBSA, as there were currently insufficient sanctions being applied to UoB to ensure compliance with management requirements. 	
---	--

<ul style="list-style-type: none"> • Support from the UoB and references to UWE: A number of references considered that the 'need to have support from the UoB' did not demonstrate market fairness, and placed one private organisation with commercial interests at an unfair advantage. UWE requested that the policy be amended to include the support of both or either of the universities throughout. UWE considered that this fails to recognise that PBSA is also required by students of UWE and other higher education institutions in Bristol, and that the support of one or more higher education providers will be taken into account in the determination of planning applications, but it should not be an explicit requirement. • Locations: <ul style="list-style-type: none"> ○ One comment considered that the policy was generally unclear how the defined locations had been identified, suggesting that defined locations require sequential testing and an assessment of existing harmful concentrations of PBSA. ○ One comment considered that there should be a desire to spread concentrations of students across the City, away from Clifton / North Bristol but this should equally not have resulted in major development of PBSA in South Bristol. ○ One comment considered that there should be a rebalance of inner-city wards prior to promoting university expansion. ○ One comment considered that whilst there are areas of the city which are not suitable for student accommodation, to say the entire areas (i.e. Old Market) are unsuitable, is unnecessarily restrictive. ○ One comment considered that 'appropriate locations' will concentrate negative consequences of PBSA and consider that these must benefit from sustainable transport options to ensure that there is no unintended consequences. One comment considered that locations such as St Philip's Marsh and Western Harbour, seem illogical and counter intuitive to the policy's purpose. By restricting mix of uses (i.e. PBSA outside the defined locations), large areas, such as Bristol Shopping Quarter and Frome Gateway, which are predominantly commercial businesses, may not benefit from the additional vitality that such developments would bring. ○ One comment noted that the policy does not currently specify the amount of bedspaces for the University Precinct and other residential campuses. ○ One comment considered that there was no explanation for the stated threshold amount at each of the 'defined locations'. It was suggested that the numbers stated should only be classed as indicative capacities unless the Local Plan provides evidence of why an exceedance of new PBSA will be harmful at the defined locations. • Mix of uses: Several comments considered that defined locations should not be used for a single student accommodation use and should instead support a mix of uses. One comment cited support for the previous iteration of ULH6 which required a 50% student floorspace in large-scale proposals. • Tall buildings: One comment considered that student accommodation should not be brought forward as tall buildings as this can result in poor social interaction between students. • Process and clarity of mapping: One comment considered that the BCC response to the 2018 consultation on policies of H7 was inadequate. One comment considered that diagram 7.1 only refers to UoB and does not refer 	
---	--

<p>to other HE institutions such as UWE. All other HE institutions should be acknowledged, and sites associated with them added to diagram 7.1. One comment was concerned with the overall legibility of the map.</p> <ul style="list-style-type: none"> • Supporting access to university: One comment considered that there is no mention of the cost of student housing within Bristol and that this has an impact on widening access to universities. • Supporting infrastructure: One comment considered that student accommodation should be near to transport and conference buildings. One comment considered that there needs to be adequate public transport and quality cycle routes developed between the universities and potential sites for student housing, prior to the development of PBSA (particularly at St Philips Marsh and Bedminster). Comment that there would be a good case for increasing frequency on the Severn beach railway line. <p><i>Comments in Objection (8):</i></p> <ul style="list-style-type: none"> • Unrestricted growth: One comment considered that the universities were being allowed to grow without scrutiny. • Community focus: One comment considered that the policy needed greater focus on what facilities could be provided for the community, and what the community could provide to integrate these developments into existing communities. • University support: Several comments strongly objected to a requirement to have support from the university as this was considered to be onerous. If there is demand for PBSA, it should be irrelevant whether there is support from the university. • Supply: Several comments stated that provision should not be on a one to one basis (i.e. one additional student - 1 bed space), as no additional uplift in student numbers may not mean that there is no demand. There was considered to be a general undersupply of existing PBSA, and therefore the policy should aim to match or exceed provision of purpose-built accommodation. Several comments requested the removal of 'up to' limits on bed space provision, on the basis that evidence of student numbers is currently higher than planned. • Affordable provision: One comment objected to proposals which would require a proportion of student accommodation to be affordable. • Harmful concentrations: One comment considered that the definition of harmful considerations could apply to any type of development. The outlined threshold which would classify more than 1,000 bed spaces within 200m as resulting in harm is arbitrary and ill-conceived. One comment considered that it is unrealistic to expect PBSA schemes to ensure no adverse impact on surrounding communities - this should form the basis of an appropriate management plan. • Defined Locations – demonstrable support through the Neighbourhood Development Plan (NDP): One comment considered that this cannot always be demonstrated and suggested that this is revised to ensure that communities are consulted and informed where possible. One further comment objected to the identification of areas as highly restrictive, and considered that a high concentration of student accommodation in very specific areas was likely to result in 'harmful considerations'. • Quantum: One comment considered that the amounts of PBSA proposed at specific locations appeared to be low in the context of demand that has been 	
---	--

noted. Consider that this will be compounded by potential job market uncertainty which could result in more secondary school leavers applying for university if there is a reduction in market movement and less jobs available.	
<p>UoB Precinct</p> <p><i>Comments neither in support nor objection (3):</i></p> <ul style="list-style-type: none"> In relation to appropriate areas, one comment considered that this is likely to result in harmful concentrations and a crowding-out of other uses, rather than a sustainable increase in PBSA. The comment further stated that appropriate locations identified and demonstrably supported by local communities through NDPs seems overly restrictive and unlikely to be achievable. One comment questioned why other establishes campuses at Clifton and Stoke Bishop are not mentioned. One comment considered that, specifically in this location, was development of PBSA vulnerable to a downturn in the overseas student housing market. Consider that existing units need to be flexible to other housing uses. <p><i>Comment in Objection (2):</i></p> <ul style="list-style-type: none"> One comment objected to 800 bedspaces within the UoB Precinct on the basis that the present number already damages the local community, and there is a concentration of fast food and drink businesses in the area. It further stated that high-levels of planning gains should be demanded from providers of PBSA. One comment strongly objected to the need to have required support from the university, specifically at this location. Consider the policy wording should be extended to include other institutions. 	216, 621, 877, 882, 887
<p>Clifton residential campus</p> <p><i>Comments in objection (1):</i> One comment considered that the definition of appropriate locations would create harmful concentrations and not result in a sustainable increase in PBSA.</p>	877
<p>Stoke Bishop</p> <p><i>Comments neither in support nor objection (13):</i> Comment that existing concentrations of PBSA has raised significant issues regarding the following, for which an increase in numbers of students will only exacerbate:</p> <ul style="list-style-type: none"> Regulation of student parking (particularly on side-roads such as Parry's Lane, Elmlea Avenue, Shaplands, Rylestone Grove etc), poor highways safety (particularly in relation to Elmlea Infants School) and negative impacts on residential / emergency access and cycle lanes. Suggested that planning permission should not be granted for additional accommodation until adequate on-site parking can be achieved, and one comment suggested that methods of sustainable travel will need to be supported. Several respondents considered that this was the responsibility of the UoB to manage provision of better parking and increase safe parking for students to reduce the implications on the local community. Principle of development: Whilst one comment did not object to the principle of increased number of students on the Stoke Bishop halls of residence, several respondents had general concerns with the increased number of students on the Stoke Bishop halls of residence site. Planning contributions: Two comments considered that the policy should require UoB upgrades cycle lanes along Parry's Lane and install 'no parking' signage, maintain a register of car-users, pay for security to patrol and record 	113, 137, 142, 251, 258, 264, 282, 283, 284, 293, 295, 297, 298, 303, 305, 306, 307, 310, 311, 313, 317, 319, 337, 338, 342, 352, 357, 380, 391, 392, 406, 412, 422, 434, 443, 466, 479, 511, 521, 531, 542, 545, 560, 561, 571, 600, 601, 604, 640, 653, 688, 697, 708, 725, 737, 741, 742, 749, 760, 771, 787, 850, 877,

<p>/ report sites parked on cycle lanes or obstructing pavements; implement stringent climate emergency policies; or introduce car-sharing or bike-sharing schemes. Planning conditions should be robustly worded to ensure effective enforcement, and should not just result in displacement of parking beyond elsewhere within Stoke Bishop.</p> <p><i>Comment in Objection (54):</i> A very large number of comments were made strongly objecting to this element of the policy on the basis of the impact of student development on Stoke Bishop. Strong objections were formed on the basis of:</p> <ul style="list-style-type: none"> • Undefined location: Several comments were concerned that the policy did not state where these 1,000 places will be built. Concern that this would enable the UoB to build without consideration of the Stoke Bishop area, and that this could be out of character with the area (particularly adjacent to the Downs or Parry's Lane). • Unsafe Parking and Highway Safety: Strong concern that growth in the Stoke Bishop student residences, if permitted, will very likely cause adverse impacts on parking. Citing the same roads above, several comments raised concern that Stoke Bishop is not car-free and that student residents park both illegally and dangerously around existing residential streets. This often precludes safe emergency vehicle access, creates a dangerous environment with poor visibility for cyclists and poor accessibility for pedestrians and children using local schools. One comment considered that car-parking should be included within the list of 'less positive effects'. One further comment considered that police cannot enforce dangerous parking under existing road markings. • Result in harmful impacts on residential areas and reduce diversity of uses in the local area: Several comments were concerned that the expansion would create an imbalance between the population of transient students and permanent local residents. Concern that there is evidence of open hostility in Stoke Bishop on this basis, at present. One comment considered that the policy requires an additional 1,000 units to 'have no adverse impacts on existing residential areas' – however this is already the case. Planning policy does not recognise that areas with existing student accommodation may already have reached a limit of what is sustainable and may already be experiencing harmful impacts. These harmful amenity impacts were cited as: <ul style="list-style-type: none"> ○ Noise: Several comments considered that noise-mitigation measures should be implemented, and there should be better monitoring of student noise. ○ Litter: Object to student development as a result of the litter that is created - management schemes imposed by the university are not working. ○ Air pollution: One comment objected to the development of 1000 student units on the basis that this will increase air pollution issues related to car use. ○ Anti-social behaviour: Several comments considered that this was not being managed effectively. ○ Congestion: Associated with significant levels of parking and poorly parked cars, and congestion due to the University bus-hub. • Introduce a lower cap or alternative sites: Several comments considered that to address concerns, student development at Stoke Bishop campus should be capped. This would prevent increased negative impacts on environment from 	<p>918, 922, 955, 967</p>
--	---------------------------

<p>traffic, pollution, loss of green space must be prevented, and steps must be taken to address issue of on-road parking, e.g. controlled parking, prevention of parking in cycle lane, effective enforcement of UoB policies on students bringing cars. One additional comment considered that the UoB had significant land-holdings and could accommodate the growth on alternative sites.</p> <ul style="list-style-type: none"> • Increase in student numbers will not be carefully managed: A number of respondents stated that the previous PBSA expansions (Hiatt Baker Hall) had resulted in a significant increase in the number of cars and harmful impacts of students, and this had not been managed so had resulted in displacement of parking within the local area. UoB should contribute to sufficient residents parking (such as ensuring students park on existing under-used car-parks or funding a Residents Parking Zone or limited parking) if an application were to be approved within the area. As UoB cannot stop students from bringing their cars, considered student parking permits should be introduced. • Loss of green space and impact on Conservation Area: Concern that the expansion of Stoke Bishop campus would negatively impact current and future amenity of its occupants and local residents due to loss of green space. One comment considered that this would place pressure on Stoke Lodge ROS. One comment considered that as the campus is within the Downs Conservation Area, whilst trees were conditioned last time, these had not all been delivered and this had impacted the setting of the Conservation Area. • Insufficient infrastructure to support: Several comments considered that there was insufficient infrastructure to support growth within the area. • Appropriate locations: In relation to appropriate areas, one comment considered that this is likely to result in harmful concentrations and a crowding-out of other uses, rather than a sustainable increase in PBSA. The comment further stated that appropriate locations identified and demonstrably supported by local communities through NDPs seems overly restrictive and unlikely to be achievable. 	
<p>Bristol Temple Quarter <i>Comments neither in support nor objection (6):</i> These comments considered:</p> <ul style="list-style-type: none"> • Programme for delivery: Several comments considered that policies should ensure new student accommodation at Temple Campus is ready before the arrival of students, to prevent a spike in local rental prices for existing homes. One comment considered that the policy should not rely on private development elsewhere to supplement supply. • Higher quantum: One comment considered that only 3,000 bedspaces have been planned for Bristol Temple Quarter and St Philips Marsh, however the Temple Quarter Enterprise Zone is expected to accommodate 3,500 students. Clarity is requested in relation to whether the 3,000 bed spaces identified are additional to those proposed on the new Temple Campus (which is currently understood to be 953 beds). One comment stated concern that the remaining 1,400 students will live in existing accommodation or HMOs. • Evidence: One comment considered that it was unclear how the level of development at the University Campus or Temple Quarter had been derived. • Ensuring type of provision aligns with planned student growth: Given the postgraduate focus of the new campus, one comment considered that there will be benefits in ensuring that the type student accommodation and supporting infrastructure built on St Philips Marsh and Bristol Temple Quarter is more specifically aimed at these types of students. One comment stated 	<p>273, 446, 643, 811, 817, 877, 892, 907</p>

<p>that this should include space to develop high-skilled and high-value enterprise within the area.</p> <ul style="list-style-type: none"> One comment noted Bristol Temple Quarter and St Philips Marsh is included twice and assume this is also an error. <p><i>Comment in objection (2)</i></p> <ul style="list-style-type: none"> One comment in objection considered that there were too many bedspaces provided given local housing need. Appropriate locations: In relation to appropriate areas, one comment considered that this is likely to result in harmful concentrations and a crowding-out of other uses, rather than a sustainable increase in PBSA. The comment further stated that appropriate locations identified and demonstrably supported by local communities through NDPs seems overly restrictive and unlikely to be achievable. 	
<p>St Philips Marsh</p> <p><i>Comments in support (1):</i> One comment was in support of the promotion of new student bed spaces within the area.</p> <p><i>Comments neither in support nor objection (4):</i></p> <ul style="list-style-type: none"> Higher quantum: One comment considered that only 3,000 bedspaces have been planned for Bristol Temple Quarter and St Philips Marsh, however the Temple Quarter Enterprise Zone is expected to accommodate 3,500 students. Clarity is requested in relation to whether the 3,000 bed spaces identified are additional to those proposed on the new Temple Campus (which is currently understood to be 953 beds). One comment stated that a restriction to 700 bedspaces was unsustainable and unsound, and would push development to less suitable locations. Ensuring type of provision aligns with planned student growth: Given the postgraduate focus of the new campus, one comment considered that there will be benefits in ensuring that the type student accommodation and supporting infrastructure built on St Philips Marsh and Bristol Temple Quarter is more specifically aimed at these types of students. One comment state that this should include space to develop high-skilled and high-value enterprise within the area. Affordable student housing provision: One comment considered that there should be additional clarification in respect of the provision of affordable units particularly within this area. This should make it clear that viability is a factor. <p><i>Comment in objection (1):</i> One comment in objection considered that there were too many bedspaces provided given local housing need.</p>	<p>643, 811, 817, 827, 836, 892</p>
<p>Broadmead and Frome Gateway</p> <p><i>Comments in support (1):</i> One comment supported the location as being appropriate for PBSA, however considered that greater flexibility was needed in relation to the number of bedspaces prescribed.</p> <p><i>Comments neither in support nor objection (4):</i></p> <ul style="list-style-type: none"> Higher quantum: Two comments considered whether it was appropriate for a cap of 500 units to be placed on Frome Gateway. There is significant interest from student accommodation operators for sites such as those at Frome Gateway and there should be some flexibility in this provision to meet 	<p>818, 852, 868, 875, 877, 957</p>

<p>demand and utilise the full potential of this sustainable location. One comment noted that there is a discrepancy in total bedspaces between DS5 and H7.</p> <ul style="list-style-type: none"> • Suitability of the location: One comment supported Broadmead as a defined location, but queried whether Frome Gateway was appropriate as it is relatively isolated from the rest of UoB and does not form a logical extension to existing land-holdings. One comment considered that it is more appropriate to reduce the boundary to the north east (Frome Corridor) and extend this towards the South West (i.e. the City Centre) as this would reduce the impact on existing commercial uses, whilst ensuring the student accommodation is located more sustainably. One comment considered that particularly in the north of the City Centre (and around Stokes Croft) there was a need for a much stronger policy position on balancing the level of student accommodation. • Mix of uses: One comment was unclear how introducing PBSA into Frome Corridor would interface with later policies in the plan, which require that there is no harmful impact on commercial areas. • Implementation: One comment considered that it was unclear how the PBSA cap in this area would be implemented. <p><i>Comment in objection (1):</i> In relation to appropriate areas, one comment considered that this is likely to result in harmful concentrations and a crowding-out of other uses, rather than a sustainable increase in PBSA. The comment further stated that appropriate locations identified and demonstrably supported by local communities through NDPs seems overly restrictive and unlikely to be achievable.</p>	
<p>Central Bedminster <i>Comments neither in support nor objection (3):</i> Two comments considered that the threshold/capacity for Central Bedminster should be increased to 1,350. As Central Bedminster is not currently an established location for PBSA, it is important that a critical mass of accommodation and supporting facilities can be established, especially to promote student welfare.</p> <p>A third comment considered that proposals for student accommodation within the area already far exceeded this total. One comment considered that there was no discussion of what harmful consequences of over-concentrations of students in the area might look like, nor how these would be assessed.</p>	627, 887, 923
<p>Western Harbour: <i>Comment neither in support nor objection (1):</i> Comment that UWE are reviewing the provision of additional student accommodation to support their City Campus and suggest that the Western Harbour area should be expanded to include the Bower Ashton Campus. Explicitly, this representation considered that the education allocation of Bower Ashton could be expanded to cover the adjacent BCC owned wood yard</p>	488

<p>Other locations</p> <p><i>Comments neither in support nor objection (11):</i> These included:</p> <ul style="list-style-type: none"> • Flood Zones: Two comments considered that development of PBSA in flood zones may be one way of maximising the use of land, may make development cheaper or would be less intrusive (given these rooms are often vacant for large parts of the year). • Appropriate Locations should not be developed at the expense of other suitable locations: One comment suggested BDA0302 could be a suitable location given proximity to UWE Bower Ashton and University of Bristol, and this should not be ruled out by policy. • Mixed Use and other locations: One comment considered that the requirement to build PBSA in other locations, subject to being mixed use developments, could prove extremely difficult to facilitate and severely limit delivery of much needed accommodation. Several comments considered that clarity is needed regarding the definition of mixed use as it is not clear whether this means other residential accommodation or non-residential uses. If other residential uses are proposed, then avoiding a non-residential context is likely to be contradictory. Several comments stated that there was no national policy basis for PBSA to be part of wider mixed-use schemes. One comment considered that the incorporation of mixed-use can lead to greatly increased costs and proposed different uses will have different needs. • Evidence: Several comments considered that there was limited evidence for the threshold of 1,000 bedspaces within 200m of the site, in a commercial context. One comment considered that this reference should be removed, as PBSA provides diversity of uses in an area and demand for both day and evening economies, whilst a second comment considered that this should be assessed on a case-by-case basis. <p><i>Comment in objection (3):</i> One comment objected to the development of additional accommodation in Stokes Croft, as the cumulative impact of recent applications, existing concentrations and live applications, could result in over 2,000 students being located between Stokes Croft, Cumberland Street and Upper York Street, focussed around the corner of Backfields.</p> <p>UoB have stated concern that this requirement may be impractical or unviable in many cases, thus potentially restricting the supply of PBSA that would otherwise be acceptable to both the University and the Council. UoB suggested that the policy is re-worded to the effect that mixed-use will be expected unless there is evidence to demonstrate that this is unviable, impractical, or otherwise undesirable on planning grounds. In addition, further clarification was requested in relation to how the extent to which “PBSA should avoid areas with a primarily residential content” will be assessed or evaluated.</p>	<p>621, 622, 643, 799, 815, 816, 818, 827, 829, 877, 887, 892, 907, 968</p>
--	---

<p>General provisions</p> <p><i>Comments neither in support nor objection (11):</i></p> <ul style="list-style-type: none"> • Car-free and deter occupants from the parking of cars elsewhere in the city: Concern was expressed about the current level of regulation and management of this issue by UoB; impact on local resident surrounding roads; specific impact on Parry's Lane of illegal parking by students; and that unregulated parking will increase with proposed development if this is not addressed by UoB/BCC. One comment was made in support of this requirement, whilst another considered that UoB had a strong role in encouraging students not to bring cars. • Flexibility: Several comments considered student housing should be designed with flexibility in mind to ensure that these can be used by single people and families if these become under-occupied. One comment was concerned that as currently written, there is a risk these units could be let on the general private housing market in the future without meeting any space standards. • Definitions and evidence: Several comments considered that 'adverse impact', 'harmful concentrations', 'strong residential content', 'commercial areas', 'good standard of accommodation' and 'surrounding communities' need greater levels of definition, and should be assessed via a criteria-based approach. One comment considered that it was unrealistic to expect that PBSA will have no adverse impact on surrounding communities -this is too low a benchmark. <p><i>Comment in objection (4):</i></p> <ul style="list-style-type: none"> • Support from UoB: Several comments considered that this requirement needed to be removed, and replaced with a requirement to submit a Student Needs Assessment with each application. • One comment considered that through the policy, the student population should be afforded an equal standing to usual residential populations. A further comment considered that a requirement for 'an appropriate management regime' should also be removed. 	<p>142, 273, 429, 446, 608, 816, 818, 868, 876, 877, 887, 892, 894, 923, 955</p>
<p>Affordable student housing requirement</p> <p><i>Comments neither in support nor objection (13):</i> This included:</p> <ul style="list-style-type: none"> • Applicability: Several comments were unclear whether the affordable student housing requirement applies to all identified locations in the policy and whether it also applies to 'other locations' too. One comment considered that within the specified areas, development could be offered an incentive. • Viability testing and evidence: One comment considered that this requirement should be subject to viability testing, as is the approach within the London Plan. Several comments considered that this requirement was not supported by any evidence base and this should be published and clearly referenced within the policy. One comment stated that the Wider Bristol Strategic Housing Market Assessment made no reference to affordable need for students, whilst another stated that this policy did not account for any income that students may earn during their studies – several comments called for additional clarity on the identified need. • Affordable Provision and other requirements: Several comments considered that a requirement for 35% affordable housing, when student accommodation is provided as a C3 use needs clarification; as it is unclear when PBSA in C3 use class is anticipated. Several noted the need to update the CIL charging schedule to reflect the need to provide affordable student 	<p>488, 799, 815, 816, 818, 827, 831, 876, 877, 887, 882, 892, 893, 894, 923, 968</p>

<p>accommodation. Several comments were concerned over how good quality affordable PBSA could be delivered in such a circumstance.</p> <ul style="list-style-type: none"> • Higher Target: One comment considered that at least 50% of student accommodation should be affordable. Receiving full Student Maintenance Loan (SML) shouldn't be criteria for affordable student housing, as many others not on full SML will still struggle to pay for accommodation. • Requirement to have support from UoB: Whilst in support of the requirement to have backing from the UoB as this would ensuring an appropriate type of accommodation and pricing, one comment recommended that affordability is considered on a case-by-case basis, in consultation with the University (removing the need for a blanket target). <p><i>Comment in objection (3)</i></p> <ul style="list-style-type: none"> • 30% requirement: UWE was not in favour of a 30% requirement as this would be overly prescriptive and likely impact scheme viability, a view which was echoed by UoB. Instead, UWE would only support schemes which they considered to be viable and affordable based on current standards and experience (i.e. premium rents would not be accepted on any schemes involving UWE in any capacity). UoB requested a flexible approach to the provision of affordable student accommodation, based on prevailing, evidenced needs. Consideration of affordability should be undertaken on a case-by-case basis and the support of the University (or other establishment) should be an important factor in assessing whether a proposal will effectively address the identified need it is intending to meet. • Impact on costs of non-affordable units and viability: Two comments considered that the majority of provision is brought forward in combination with Universities anyway, and providers are often committed to achieving below-market rate. Recommend that this element of the policy is deleted. • Evidence: One comment objected on the basis of no evidence to demonstrate 30% target is either required to support need or is appropriate. The comment raised practical queries such as how this would be implemented and calculated in terms of units. Affordable housing on-site is not compatible with PBSA 	
---	--

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 53 Comments from statutory bodies and partnerships

Consultee	Reference
South Gloucestershire: In relation to the lack of identified areas for UWE development, SGC considered that this policy approach has the potential to increase student housing pressure in areas of South Gloucestershire. SGC wish to support the working with BCC to develop a complementary and consistent approach, which reviews analysis undertaken and the types of solutions which have been considered.	610

36. H8: Older people's and other specialist needs housing

Overview: In total, 14 respondents made 19 comments regarding policy H8 Older people's and other specialist needs housing. Key themes are identified in the table below.

Table 54 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy H8</p> <p><i>Comments in support (3):</i> Two respondents supported the principle of BCC planning to meet a spectrum of different housing needs, and the principle of directing this type of accommodation towards locations that are both accessible and which have facilities in close proximity. Whilst respondents were generally supportive, groups considered that careful consideration was needed about where sites should be allocated, suggesting these needed to be near where older people wanted to live. A further comment stated support for the removal of the blanket target proposal in the 2018 version of the Plan.</p> <p><i>Comments neither in support nor objection (7):</i> Key comments include:</p> <ul style="list-style-type: none"> • Type of provision: Several respondents considered that the Plan should seek to address household choices and encourage an ageing population to move into smaller homes which would free up family housing. A further comment considered that there was a need for a greater focus on integration of health and social care, and that a more innovative approach was necessary to respond to the diverse needs of the elderly within integrated communities. One comment considered that there was also a need for communal facilities. • Viability: Several comments considered that the policy should be viability tested in accordance with local demand. <p><i>Comments in objection (1):</i> One respondent referenced the need for optional national technical standards to be evidenced-led and the impact on viability to be considered.</p>	322, 356, 420, 603, 646, 672, 793, 807, 844, 870, 893
<p>References to 60 dwellings or more and a minimum of 10% affordable specialist housing</p> <p><i>Comments in support (1):</i> There was comment in general support for the principle of the policy.</p> <p><i>Comments neither in support nor objection (5):</i> Whilst broadly in support, several comments objected to the lack of flexibility for site-specific circumstances where 10% affordable is unviable – for example, on brownfield sites where costs may be unknown. Suggest that provision of an alternative type of housing type should be stipulated where it is not viable to provide affordable housing. One comment considered that the rationale should be the same as other types of affordable housing (i.e. 35%).</p> <p><i>Comments in objection (2):</i> Several comments considered that the policy should be removed until it had been policy tested. These policies states that there was insufficient evidence in relation to the 10% requirement, what constitutes affordable accommodation and the practicalities of managing the affordable units (which would likely be through a separate provider).</p>	420, 490, 807, 870, 888, 893, 894, 895

37. H9: Accessible homes

Overview: In total, 28 respondents made 41 comments regarding policy H9 Accessible homes. Key themes are identified in the table below.

Table 55 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy H9</p> <p><i>Comments in support (3):</i> General support for aspirations for high standards in relation to adaptability which can mean that people can stay in their homes for longer. One comment specifically stated that Lockleaze had high levels of disability and lower-levels disability free years, and therefore this policy-requirement was supported.</p> <p><i>Comments neither in support nor objection (14):</i> Comments considered the following points:</p> <ul style="list-style-type: none"> • Wide definition of ‘accessible homes’: One comment considered that there was insufficient consideration of other forms of accessibility, beyond older people and wheelchair users. A second comment considered that the approach needed to be more innovative and respond through other more-interventional means to providing inclusive and accessible homes. • Viability: Several comments considered that there was insufficient consideration of viability within the policy text, and that paragraph reference 7.64 should be included in the wording of the policy. In addition, it is suggested that the policy is revised to make reference to Paragraph 009 of the NPPF which states that Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the Local Authority is responsible for allocating or nominating a person to live in that dwelling. • Evidence and identified need for such properties: There were several comments in relation to a lack of sufficient evidence to justify optional standards, nor how the 10% and 100% targets have been reached. One comment related to relooking at Environmental Access Standards as an agreed baseline for evidence, whilst another considered reviewing the NHS Long Term Plan (2019) which places a greater focus on the integration of health and social care. Note that the policy will need to be compliant with the PPG Housing Optional Technical Standards. • Additional standards: One policy considered that development also needs to have accessible bus stops within a 100m threshold. 	<p>76, 490, 524, 626, 647, 648, 793, 807, 818, 844, 866, 870, 877, 880, 882, 885, 963</p>
<p>10% / 50 dwelling threshold</p> <p><i>Comments in support (2):</i> There was broad support for the content of the policy, explicitly supporting a threshold for achieving more accessible homes.</p> <p><i>Comments neither in support nor objection (4):</i> Comments considered the following points:</p> <ul style="list-style-type: none"> • Evidence: Several comments questioned the evidence to support the level of requirements, stating that a local needs assessment should be published which also demonstrates how this policy-requirement has been viability tested. This will be particularly difficult to justify given the Bristol SHMA 2015 Vol 2 states that there is only a requirement for 5% market housing and 8% affordable housing to meet ‘Category 3’ requirements. 	<p>322, 615, 647, 648, 807, 819, 845, 870, 888, 893</p>

Key Themes	Respondent References
<ul style="list-style-type: none"> Viability: Commenters considered that the policy had not been viability tested and the viability impact should consider the cumulative impact of the LPR, proposed retained policies and the JSP. <p><i>Comments in objection (4):</i> Several comments stated objection to this policy, considering that it is not justified nor has the impact of proposals been tested, and that it is contrary to national policy and guidance (NPPF Paragraph 34). The comment considers that each application should be based on its own merits and should consider the deliverability of sites.</p>	
<p>M4(2) Building Regulations compliance</p> <p><i>Comments in support (2)</i> One comment that was generally in support considered that further clarification was needed on the definition of 'larger schemes'.</p> <p><i>Comments neither in support nor objection (10):</i> Comments include the following:</p> <ul style="list-style-type: none"> Comment that it is likely that it will not be possible to provide all dwellings compliant to Building Regulation M4(2) and that the policy should include an exceptions test. Revised Standards: Three comments considered that: <ul style="list-style-type: none"> At least 10% of new build housing in proposals of 50 dwellings or more should be designed to be compliant with Building Regulation M4(3) Category 3: Wheelchair-user dwellings. All new build housing should be accessible and adaptable for wheelchair users (M4(2): Category 2). Where specific factors of a site or individual plot is less suitable for M4(2) and M4(3) compliant dwellings, alternative provision to ensure the dwelling achieves an appropriate level of accessibility will be sought. Co-production of policy: One group considered that the policy should be developed in collaboration with various disabled people's groups on accessible designs. <p><i>Comments in objection (2):</i> Comments are generally relating to the lack of viability testing and evidence of need for these optional standards, encouraging the LPR to be aware of the likely future need, accessibility and adaptability and variations in needs across different housing tenures.</p>	<p>420, 647, 648, 656, 657, 671, 672, 793, 807, 812, 844, 845, 866, 870</p>

38. H10: Planning for traveller sites

Overview: In total, 6 respondents made comments regarding policy H10 Planning for traveller sites. Key themes are identified in the table below.

Table 56 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy H10:</p> <p><i>Comments in support (1):</i> There was support for the provision of gypsies and travellers in planning policies.</p> <p><i>Comments neither in support nor objection (3):</i> Two comments referenced a Counsel Opinion states that this policy should exclude Local Green Space, Reserved Open Space, the grounds and setting to historic buildings. One comment considered support for planning for travellers, however considered that this must extend to the assessment of van-dwellers too. This should include establishing a process to identifying temporary development land for them to use with basic facilities to avoid the need to for encampments in residential areas.</p>	100, 116, 610, 807, 894, 964

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 57 Comments from statutory bodies and partnerships

Consultee	Reference
<p>South Gloucestershire Council: Request that this policy has greater regard for the National Planning Policy for Travellers Sites, for which the overarching aim is to ensure fair and equal treatment for travellers and to ensure that current and future needs have been met. SGC request to be kept up-to-date in the continuing production of the Gypsy and Traveller Accommodation Assessment and approach to Gypsy/ Traveller and Travelling Showpeople provision.</p>	Ref 610
<p>Environment Agency: Consider that the policy should refer to the avoiding areas of flood risk in accordance with the national planning policy and associated planning practice guidance.</p>	Ref 964

39. Section 8: Economy

Overview: In total, 9 respondents made comments regarding the introduction to Section 8 – Economy. Key themes are identified in the table below.

Table 58 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle</p> <p><i>Comments in support (1):</i> While expressing general support for Section 8 policies, one respondent also considered that the introductory text should make references to the significant contributions from the education sector to the city's wider economy.</p> <p><i>Comments in objection (1):</i> One comment objects to the downgrading of employment provision in South Bristol in the plan, and states that mixed-use development does not guarantee new employment provision given the large disparity in development value of residential and different employment uses.</p> <p><i>Comments neither support nor objection (7):</i> One comment was made that Urban Living principles stated under policy UL1 need to be applied to retail and repeated in Section 8 – Economy.</p> <p>Several comments were made querying what the evidence base is that underpins Section 8 policies, and specifically if there is an Employment Land Strategy which should inform the overall spatial distribution for employment development and the policies. One comment considers that the policies in Section 8 will not deliver sufficient quantities of workspace to meet current demand and demand to 2036.</p> <p>One comment considered that Section 8 policies are not sufficiently clear on the approach to development proposals that would result in a loss of employment floorspace, except for those that are retained as IDAs in policy E4. It stated that the current adopted plan is clear on its requirements on proposals for loss of employment space via policies BCS8, DM12. DM12 in particular engages four 'tests', one of which must be satisfied to release employment space for other uses, and this plan is absent of such criteria.</p> <p>One comment refers to the need to reference the economic importance of Bristol Airport, in particular for employment opportunities and economic growth, as well as supporting regeneration in other sectors, access to overseas markets and access for international students. Another comment supports the modest expansion plans of Bristol Airport and its role in supporting the South Bristol workforce.</p>	<p>621, 647, 648, 825, 862, 871, 873, 877, 887</p>

40. E1: Inclusive economic development

Overview: In total, 25 respondents made 26 comments regarding policy E1 Inclusive economic development. Key themes are identified in the table below.

Table 59 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy E1</p> <p><i>Comments in support (5):</i> Comments were made in general support for the principle of the policy, however some respondents stated that the requirements should be subject to viability. Another comment stated that all possible incentives should be used to encourage employers and developers to support employment of local people and those with protected characteristics. One comment stated that the policy should be applied to South Bristol in the Local Plan in order to be inclusive.</p> <p><i>Comments in objection (1):</i> One respondent strongly objected to the removal of BCS8 from Core Strategy which set out specific targets for employment, by sqm office space or hectares of industrial land. The comment continued, by objecting to the fact that this Local Plan Review has no employment or employment land targets, which it considers risks unbalancing the Plan away from economic element of city.</p> <p><i>Comments neither support nor objection (15):</i> Several comments stated that the implementation of the policy is not clear. They stated that clarity is needed on employment and training expectations from large schemes, how the policy will be monitored and what is defined as 'local' employment. It is stated that council support will be required to build strategic relationships with education providers to implement the policy.</p> <p>One comment queried whether continued growth should be an aim of the policy as this does not necessarily result in citizens' wellbeing. Another comment stated that marginalised groups must be included in decision-making of employment-based development, both across geographical areas and all industries. Groups typically underrepresented in industries like finance and law should be included to increase confidence in decision-making, welcome new cultures and help address economic inequality. A comment was also made expressing concern about the loss of manual employment through the policy, which provides no protection against the loss of manual jobs, for example through automation, and favours high tech and high value employment sectors, to the potential detriment of local residents.</p> <p>Several comments highlighted a lack of mention of the 24 hour economy and nightlife, which are vital employment land uses, and which can have a big impact on social mobility. The NPPF paragraph 161 was quoted which states, the need for local plans to 'assess need for land/floorspace for economic activity including leisure'. The Bristol One City Plan was also referenced. It is suggested that an SPD for Bristol Culture and Nightlife could be created, and a local partnership group which consists of relevant stakeholders to support this sector and decision-making related to it.</p>	<p>76, 361, 619, 631, 751, 778, 783, 795, 807, 811, 812, 823, 865, 871, 873, 874, 889, 891, 893, 894, 963</p>

<p>One comment stated the need for a tourism policy in the plan.</p> <p>One comment stated that worklessness and low skills could be addressed through green jobs, major development and infrastructure systems which contribute to local economic growth and resilient, sustainable developments. It suggests use of planning requirements to deliver green jobs.</p> <p>Two comments stated that there is insufficient emphasis in the plan placed on the sustainable development of employment sites and proximity to residential sites, to reduce the need for car-based travel. Suggestion that there should be a requirement on developers to build employment locations capable of providing one full time job for every household constructed no more than 3.5 miles from every residence that they construct.</p> <p>One comment was made that Barton Hill Trading Estate can support the aims of this policy through intensifying existing employment.</p>	
<p>Policy threshold</p> <p><i>Comments in support (2):</i> Two comments expressed general support but requested further clarity for evidence behind the thresholds of 1000sqm and delivery of 100 homes or more.</p> <p><i>Comments in objection (1):</i> One objection raised concern that the thresholds are too onerous and wide ranging. It considers that the requirements should only be applicable to strategic employment areas, otherwise it would place onerous requirements on non-strategic employment derelict sites.</p> <p><i>Comments neither support nor objection (2):</i> One comment stated that the thresholds mean that the policy will only apply to major or super-major developments. One comment queried why the thresholds are set at the specified levels and whether the policy will apply different across allocated and non-allocated sites.</p>	<p>816, 818, 825, 888, 893</p>

41. E2: Employment land strategy

Overview: In total, 24 respondents made 29 comments regarding policy E2 Employment land strategy. Key themes are identified in the table below.

Table 60 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy E2</p> <p><i>Comments in support (5):</i> Some comments expressed general support for the policy aims and wording. One comment stated that the policy should be more positively worded to encourage employment proposals at Temple Quarter, while another comment expressed support for Avonmouth as a location for new workspace and industry and distribution. One comment suggested that the policy should have properly evidenced targets for various types of workspace.</p> <p><i>Comments in objection (1):</i> The objection concerned the lack of provision for employment in South Bristol in the plan and considers that the Employment Land Strategy for South Bristol is inadequate, particularly in the context of significant levels of housing planned, including in North Somerset and Bath and North East Somerset. The comment raised concern about the lack of employment opportunities in South Bristol, including the maximum capacity of existing industrial parks, such as Filwood Green Business Park, and the loss of office accommodation through permitted development.</p> <p>The respondent considers that the inclusion of “mixed use” in developments does not provide sufficient guarantee of new employment provision given the disparity in property valuations between residential and different employment uses. It was stated that the Plan allocates less than 1 hectare of industrial land, which is much less than the 10 hectares allocated in the existing adopted policy BCS8. It was requested that policy provision is made for the retention of 60,000 sqm of office space as well as the allocation of 10 hectares of industrial land in South Bristol.</p> <p><i>Comments neither support nor objection (10):</i> Some comments stated that there is insufficient focus on South Bristol and no specific targets for additional employment in South Bristol. One comment stated that there is a need for an Employment Land Survey within South Bristol to address the current North/South divide, and suggested various sites that could be suitable for employment land. It was also stated by some respondents that there should be specific and evidenced targets for employment across Bristol as a whole.</p> <p>Two comments related to the need to integrate transport and employment policies, to ensure that policy E2 encourages sustainable travel to work. One comment suggested that a Henbury Loop passenger service would link to major employment areas in Avonmouth, Filton and Temple Quarter.</p> <p>One comment stated that policy E2 (alongside policies E4 and E7) are not clear on how a start-up could use local property outside of Industry and Distribution areas; requested that the policy is made flexible to allow for such a scenario. Another comment stated that the policy is not clear how small workspace will be protected and that this is important as affordable workspace for the third sector, which has</p>	<p>401, 612, 619, 657, 793, 823, 839, 840, 862, 865, 871, 873, 891, 892, 957, 963</p>

<p>seen reduced available space in the centre due to a focus on high value development and office to residential conversions.</p> <p>One comment raised concern with the evidence base for employment land in the Joint Spatial Plan, which may also apply to the Bristol plan if a specific Bristol Employment Land Study has not been carried out. The concerns related to the spatial distribution and overall quantum of employment space proposed in the JSP and therefore Bristol.</p> <p>A comment requested that Bristol Airport is referenced in policy E2.</p> <p>One comment raised concern that a requirement to incorporate new workspace within a mixed-use development could render it unviable if there is no demand in that location. It was requested that this policy approach is caveated to only apply where clear demand exists.</p>	
<p>Areas for workspace development</p> <p><i>Comments in support (3):</i> Support was stated for the identification of St Philip's Marsh is the policy and for the location of employment near to public transport, cycle and walking links, including in South Bristol. One comment stated that the policy should be worded to ensure that a range of new workspace, including Research and Development uses is provided through innovative design.</p> <p><i>Comments neither support nor objection (3):</i> One comment raised concern that a requirement to incorporate new workspace within a mixed-use development could render it unviable if there is no demand in that location. It was requested that this policy approach is caveated to only apply where clear demand exists. One comment suggested that specific targets should be clarified in the policy, while another comment suggested that Barton Hill be referenced in the policy as it could provide appropriate flexible creative and high-tech industry uses.</p>	<p>631, 632, 817, 836, 839, 874</p>
<p>Industry and distribution areas</p> <p><i>Comments in support (1):</i> One comment stated full support for the retention of the 35 identified Industry and Distribution Areas.</p> <p><i>Comments neither support nor objection (3):</i> One comment requested that specific workspace requirements should be stated in the policy to provide clarity on how much workspace is to be required through mixed use development in the plan period. One comment expressed general support for the policy but considered that it would restrict the flexibility of future land uses at Barton Hill Trading Estate.</p> <p>One comment expressed concern over the loss of Principle Industrial and Warehousing Areas through the Local Plan Review, of which it considered that the implications cannot be understood without an Employment Land Study. For example, it stated that it is not clear what the percentage loss of PIWA land would be and how this would impact on industrial locations across the city. It considered that this policy approach in the centre would result in a loss of blue collar employment in favour of higher-skilled employment, resulting in loss of accessible jobs for those on lower incomes, and implications for the principle of 'inclusive growth'. It was considered that displacement of such uses to Avonmouth is not appropriate due to lack of sustainable and low cost transport options compared to the centre, as well as a smaller surrounding population. It was considered that there is not sufficient evidence overall on the impacts of the loss of PIWAs in</p>	<p>817, 823, 874, 892</p>

terms of office and industrial land costs and national and international competitiveness.	
<p>Specific allocations</p> <p><i>Comments in support (1):</i> One comment expressed support for Netham Road/Blackswarth Road IDA which it considered will complement residential development adjacent at BDA2801.</p> <p><i>Comments neither support nor objection (2):</i> One comment expressed surprise that Coronation Road is not identified as an employment site, and considered that reference to relevant retained policies should be made in the section, including those to the maritime and retailing industries. A second comment requested that Broadmead is identified in the policy for new workspace and office, reflecting the aspirations of the plan to support diversification of the city centre to mixed use.</p>	491, 603, 818

42. E3: Location of office development

Overview: In total, 14 respondents made comments regarding policy E3 Location of office development. Key themes are identified in the table below.

Table 61 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy E3</p> <p><i>Comments in support (7):</i> Some respondents expressed general support for the policy and its wording, while two comments expressed support for the policy specifically with reference to St Philip's Marsh and Bristol Temple Quarter.</p> <p>Clarification on the policy was sought by some respondents, including a request for more detail on the quantities of office space required, including specifically in Bristol Temple Quarter. One comment stated clarity is needed on the definition of office space, which should be expanded to include Research and Development uses, and to clarify the implementation and monitoring of the policy to ensure it does not lead to oversupply. One comment stated the provision should be flexible to meet market demand.</p> <p><i>Comments neither support nor objection (7):</i> Some comments related to specific areas of the city. One comment stated that office use could also be ancillary to industrial, distribution and logistics uses, including at Avonmouth, while one comment suggested that the windfall site from Brookgate to Highridge would be suited to office development. Another comment expressed general need for employment space in south Bristol.</p> <p>One comment requested that Broadmead is identified in the policy for new workspace and office, reflecting the aspirations of the plan to support diversification of the city centre to mixed use. One comment stated that there is a need to add a reference to retained policy BCS7 to the policy text.</p> <p>One comment stated that office development is redundant until all existing stock is exhausted, stating that it is often a method to hold land to increase its value by developers and does not benefit local citizens.</p>	<p>216, 603, 619, 631, 657, 817, 818, 839, 865, 871, 891, 892, 894, 963</p>

43. E4: Industry and Distribution Areas

Overview: In total, 20 respondents made comments regarding policy E4 Industry and Distribution Areas. Key themes are identified in the table below.

Table 62 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>Reserved areas</p> <p><i>Comments in support (5):</i> Comments expressed general support for the policy approach, specifically:</p> <ul style="list-style-type: none"> One comment expressed support for the 35 areas identified as Industry and Distribution Areas, which it noted amounts to 234 hectares of land. One comment expressed support for Netham Road/Blackswarth Road IDA which it considered will complement residential development adjacent at BDA2801. One comment expressed support for the removal of Brabazon Hangar from the protected IDA areas, as it is clearly suited to alternative use and is not of strategic importance to the city's industrial and warehousing provision. <p><i>Comments in objection (1):</i> The objection stated that an area identified within the Hawkfield Business Park Industry and Distribution Area forms part of the adjoining Parkview Office Campus site (currently being refurbished for residential) and requests that this is removed from the IDA designation.</p> <p><i>Comments neither support nor objection (9):</i> Several comment stated that policy E4 represents the gradual erosion of protection for employment areas, which are getting more isolated and reduced in size. Other comments stated:</p> <ul style="list-style-type: none"> Two comments stated the need for employment space in South Bristol, including the need for additional medium to larger units of light industrial in South Bristol. One comment stated that it is unclear which PIWA sites have been de-designated within the policy, however supports the de-designation of Bedminster PIWA. One comment stated that there is a need to add a reference to retained policy BCS7 to the policy text. One comment stated that the policy needs amending to recognise that some IDAs may have opportunities for mixed use, urban living schemes, and which respond to the provisions of Neighbourhood Plans. In particular, it was stated that draft policy E4 should be reworded to be consistent with the Old Market Quarter Neighbourhood Development Plan, specifically policy B5. 	<p>491, 603, 619, 631, 841, 842, 844, 848, 851, 852, 871, 879, 904, 963, 964</p>
<p>Other uses in IDA areas</p> <p><i>Comments neither support nor objection (2):</i> One comment expressed concern that mixed-use development in areas that have previously been protected under PIWA status may harm existing business, particularly where residential uses may be in conflict with business operations. It was also stated that it may increase market pressure to redevelop existing businesses for higher value uses. The comment made specific reference to potential harm to the First Bus depot through loss of Lawrence Hill PIWA, a facility it is considered must be protected in this inner core location.</p>	<p>823, 874</p>

One comment made reference to Barton Hill Trading Estate, which it is considered is restricted by the IDA designation. As such, it is suggested that the council ensures that there is sufficient flexibility in the policy to create a significant net gain of local employment, catering for a diverse collection of industries and businesses. It states that the site could be intensified through B1(a) and B1(b) employment uses, which it is understood would currently be subject to a sequential test).	
Agent of Change <i>Comments in support (3):</i> Comments expressed general support for the principle of the approach and the intention to protecting existing businesses, including music venues. One respondent stated that the principle should reference industries, and apply also to fumes, dust, vibration, smell and light. It was stated that this policy should apply to changes of use as well as new development. It was suggested a separate Agent of Change policy should be established within the plan.	104, 641, 858

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 63 Comments from statutory bodies and partnerships

Consultee	Reference
Environment Agency (1): Please see rep for detailed comments applied to Appendix A, to be considered at: Ashley Hill, St Werburgh's; Ashton Vale Road, Ashton; Barton Hill Trading Estate, Barton Hill; Cater Road, Bishopsworth/Hartcliffe; Feeder Road, St Philip's Marsh; Malago Vale Estate, Windmill Hill; Netham Road/Blackswarth Road (south), St George; New Gatton Road, St Werburgh's; Novers Hill, Hartcliffe, Way Knowle; St Anne's Road (north), St Anne's; St Anne's Road (south), St Anne's; Vale Lane / Hartcliffe Way, Bedminster Down; Western Drive, Hengrove; Whitby Road North, St Anne's; Whitby Road South, Brislington; Whitby Road West, Brislington. EA request a copy of the proposed development allocations and growth area shapefiles for use in GIS.	964

44. E5: Avonmouth Industrial Area and Bristol Port

Overview: In total, 12 respondents made 12 comments regarding policy E5 Avonmouth Industrial Area and Bristol Port. Key themes are identified in the table below.

Table 64 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy E5</p> <p><i>Comments in support (2):</i> Two comments stated that while the policy text is supported, this approach has not been implemented by Bristol City Council in relation to the planning conditions of a recent flood defence scheme (planning application reference: 18/02847/FB).</p> <p><i>Comments in objection (1):</i> A comment in objection considered that the Local Plan Review represents a significant shift in policy from the adopted Core Strategy, with a reduced recognition of the importance of the Avonmouth Port and its economic contribution (for example, in policy BCS4). It is considered that this shift is not justified and is not supported by the National Policy Statement for Ports (2012) which requires enhancing or at least retention of policy BCS4.</p> <p><i>Comments neither support nor objection (5):</i> These included:</p> <ul style="list-style-type: none"> • One comment stated that the Avonmouth Industrial Area impact mitigation zone should cover the whole of the industrial area, while another comment proposed that flood prevention should be considered in the design and build of new development. • One comment raised concern that policy must ensure the wider industrial area of Avonmouth is appropriately safeguarded, and suggests that the policy should include provisions to state that the area should be run on clean energy and to recognise the important minerals function of the area, which are required to be safeguarded by national policy. • One comment supported the removal of PIWA status for the 'strip of land adjacent to railway line and Portview Road' which it is suggested could be used for residential uses. • One comment requested further consideration of the suitability and availability of Avonmouth for light to medium businesses, given it is currently a location for large scale distribution. 	100, 116, 216, 280, 632, 641, 854, 871, 894
<p>Specific allocations</p> <p><i>Comments in support (1):</i> One comment supports the inclusion of 'Land at Kings Weston Lane' as an allocation for future industrial and distribution development.</p>	865

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 65 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Highways England (1) Comment that additional employment land at Avonmouth will benefit from the new junction on the M49. It is noted that "detailed development considerations for these sites, including the approach to transport and access, will be included in a future version of this local plan."</p>	632

Consultee	Reference
South Gloucestershire Council (1): Comment that this policy proposes the allocation of additional employment land on green fields adjacent to the existing employment area and the designation of land at Hallen Marsh for habitat mitigation. This approach has been developed in the context of joint working in relation to Avonmouth Severnside and we look forward to ongoing joint working in this area.	610
Natural England (1) Natural England welcomes recognition of importance of wildlife in the area including Hallen Marsh, and intention to provide large scale habitat creation. Consider there may be public access and other GI benefits which could be delivered in the area.	820

45. E6: Protecting living conditions in Avonmouth village

Overview: In total, 3 respondents made 4 comments regarding policy E6 Protecting living conditions in Avonmouth village.

Table 66 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
General principle of policy E6 <i>Comments in objection (1):</i> One comment in objection considered that policy E6 is applied arbitrarily with insufficient evidence to show existing pollution control regimes are ineffective and no justification for different planning protection for this area. It is therefore considered unsound and to conflict with paragraph 186 of the NPPF.	854
Mitigation Zone <i>Comments in objection (1):</i> One comment in objection referred to a statement in the 2018 consultation of the draft plan, which stated at paragraph 3.4.15 that further consultation and community engagement on the mitigation zone would take place. It is stated that this did not take place and therefore the proposed zone is not justified. <i>Comments neither support nor objection (2):</i> One comment considered that the extent of the mitigation zone as depicted in Diagram 8.3 is correct. One comment stated that there does not appear to be sufficient technical evidence to justify the mitigation zone boundaries, which is essential, and should be made publicly available to be robust and transparent. It is considered that the policy is restrictive and therefore must have evidenced justification.	280, 854, 865

46. E7: New workspace within mixed use development

Overview: In total, 21 respondents made 21 comments regarding policy E7 New workspace within mixed use development. Key themes are identified in the table below.

Table 67 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of E7: Comments in support (5): Of the comments in support of the principle of the policy, several also requested that some points be clarified, including guidance on the quantum of workspace provision to be expected and clarification on whether the policy would be applicable to Growth and Regeneration Areas, given it does not apply to allocated sites.</p> <p>One comment stated that there should be reference to live/work space in policy, which can provide a highly sustainable contribution to employment space provision. One comment stated that 'compatible sui generis employment uses' complementary to the Local Plan strategy should also be included in the policy.</p> <p><i>Comments in objection (1):</i> One objection requested that the policy be removed, and employment provision instead be made through site allocations. The respondent expressed concern that the policy is illogical in requiring employment provision on sites which are being redeveloped due to unviable employment uses, which it is considered may not represent the best use of land. A lack of evidence or justification for a threshold of 0.1 hectares was also stated as a cause for objection, and a lack of consideration of viability in the policy, which overall was considered to be ambiguously worded.</p> <p><i>Comments neither support nor objection (15):</i> Several comments stated that the policy wording is not sufficiently flexible and does not allow for proposals to be assessed on a site by site basis. It was stated that the policy needs to be reviewed once an Employment Land Strategy is published, providing evidence to inform employment floorspace requirements, including the type and location of employment required.</p> <p>Several comments referred to the need for the policy to specify quantity of workspace required as the term 'proportionate' is ambiguous, as well as the type of workspace that would be supported through the policy; one comment queried if education uses counts as workspace given the employment it would provide.</p> <p>Several comments stated that the policy does not require like-for-like replacement of employment floorspace, and does not recognise that for many industries, workspace and residential uses are incompatible. One comment queried why the policy is only relevant to minor applications and why B1a office uses are excluded, making the approach to office re-development ambiguous.</p> <p>Several comments considered the policy to be illogical, as employment sites being redeveloped will be due to the vacancy or underuse of the site as existing, and therefore to require new employment provision may be unviable and without sufficient demand. It is stated that local demand and need, as well as viability, must be taken into account in applying the policy.</p>	<p>216, 361, 491, 615, 619, 631, 647, 648, 817, 825, 829, 842, 844, 851, 871, 885, 887, 890, 893, 904, 963</p>

<p>In terms of the location of workspace, one comment stated that for very small and start-up businesses, local workspace is required and that there should be provision in all areas for this reason. One comment considered that there is insufficient emphasis in the policy on sustainable development of workspace, with close proximity to residential sites and walking routes. It was suggested the plan should require developers to build employment locations capable of providing one full time job for every household constructed no more than 3.5 miles from every residence that they construct. One comment stated the need for an increased supply of smaller/medium to larger employment units.</p> <p>The exemption of site allocations from the policy was supported by one respondent, as loss of employment space would have been considered in allocating the site initially, and to require new employment space would be unreasonable and overly prescriptive. Another comment queried if this also applied to retained site allocations, as this isn't made clear in the policy text, nor the relationship between the proposed policy and related policies such as DS9 Brislington, where a workspace requirement is set out.</p> <p>One comment stated that new workspace is required in South Bristol.</p>	
--	--

47. E8: Digital connectivity and inclusion

Overview: In total, 11 respondents made 13 comments regarding policy E8 Digital connectivity and inclusion. Key themes are identified in the table below.

Table 68 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>Principle <i>Comments in support (1):</i> One comment supports the policy aims and policy text.</p> <p><i>Comments neither support nor objection (5):</i> One comment stated that the policy should include support for local data collection, for example, requiring new developments to commit to being part of a digital city. It considered that this would support local, sustainable economic development as part of a circular economy, supported by monitored resource and efficiency flows. One comment queried if it was realistic to assume that all developments can provide superfast broadband as a minimum and queried if the policy was deliverable. Another commented that Wi-Fi should be provided in all new homes.</p>	582, 751, 870, 871, 907, 908
<p>Requirement for Connectivity Statement <i>Comments in support (1):</i> One comment supported the principle of the policy requirement but queried whether the policy applies to minor, domestic development as it is not clear in the policy wording on extent of the policy's application.</p> <p><i>Comments in objection (3):</i> Two comments considered that the requirement for connectivity statements is unduly onerous and is addressed adequately through the planning statement of a development. One comment stated that this requirement to install dedicated telecommunications ducting for superfast broadband is onerous and increases costs associated with development. It was requested that this requirement is removed.</p> <p><i>Comments neither support nor objection (1):</i> One comment stated that the provision of broadband should be a condition for all new build schemes, especially large sites and that it can help facilitate library and information services provision.</p>	100, 816, 818, 888, 895
<p>Other issues raised: 5G technology <i>Comments in neither support nor objection (2):</i> Two comments raised concern about the health and safety implications of 5G technology roll out in Bristol, including the impacts of radiation. In particular, concern about the impact on children and pregnant women was raised, with reference to evidence studies detailing the impacts of 5G technology, and that masts should not be placed near schools.</p>	582, 908

48. Section 9: Shopping Services and the Evening Economy: Retained policies

Overview: In total, 7 respondents made comments regarding retained policies for Shopping Services and the Evening Economy. Key themes are identified in the table below.

Table 69 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy</p> <p><i>Comments in objection (1):</i> One comment objected to the lack of a change in policy for shopping areas, given the rapid change of the retail market. It was suggested that the text is amended.</p> <p><i>Comments neither support nor objection (6):</i> Several comments stated a need for more emphasis in the plan on retail through new and revised policies. It was stated that this is needed to reflect rapidly declining retail and the need for more accessible retail, particularly given the ageing population who may not drive. The need for consideration of the relationship between transport, car parking and retail was also stated.</p> <p>One comment requested would like to see more recognition of the importance of local retail and all possible support to maintaining and enhancing it, particularly with reference to the Stokes Croft area.</p> <p>One comment stated that the centre and primary shopping boundaries in the retained policies will need to be amended to reflect the development of the Broadwalk Shopping Centre under planning application reference 18/05184/P.</p> <p>One comment stated that a retained policies list after DM8 (Shopping Areas and Frontages) guidance PAN8 “Shopfront Guidelines” (1997) should be included.</p>	100, 116, 216, 603, 612, 819, 957

49. Section 10: Green Infrastructure

Overview: In total, 32 respondents made 32 comments regarding the introduction to Section 10, Green Infrastructure. Comments were also raised about the specific methodology for assessing Local Green Space and Reserved Open Space, which are analysed within Appendix A.

Key themes, including the proportion of support, object or neutral are identified in the table below.

Table 70 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General comments:</p> <p><i>Comments in support (7):</i> Broad support was expressed by some respondents for the appropriate protection and provision of green spaces, as upheld throughout the Section and detailed within the separate 'New Protection for the Assessment of Open Space'. One respondent provided explicit support for the addition of the LGS and ROS designations within the Plan.</p> <p>Support was also considered as follows:</p> <ul style="list-style-type: none"> • Ambition to conserve Green Infrastructure and accessible green spaces: One respondent agreed with the ambition to conserve green infrastructure such as parks and green lungs of natural space and the accompanying recognition of the extensive benefits of green space. Support was also expressed by one respondent for the ongoing commitment of BCC to the 'protection and enhancement of the city's natural environment', to achieving biodiversity net gain and to protecting important open spaces for people and for nature. Two further respondents support the commitment within the Plan to create more green spaces, especially where provision is poor, and to ensure easy access for walkers. • Alignment with JSP: Support was also provided by one respondent for the commitment to the natural environment and green infrastructure provision continuing to be a core aspect of both the Local Plan and JSP. Concern was held that the Green Infrastructure Strategy accompanying the JSP has not received the level of investment, resources and planning status to ensure quality and delivery; and about the cumulative impacts of development on the natural environment, alongside the ability to achieve net gains in biodiversity to effectively mitigate these impacts. • Inclusion of trees and woodland areas: Specific reference to trees and woodland areas, including publicly accessible woodlands was requested by one respondent. • Protection for garden land: It was considered by one respondent that gardens require more protection, including classic gardens that could be listed and protected from development e.g. Sir Stanley Badock's 1930s garden in Westbury or The Hermitage and Cote House gardens in Westbury. A concern was expressed that policies allowing for building on garden plots in urban areas close to transport links have led to loss of gardens and that this should be addressed by the Plan. <p>One respondent supported the incorporation of the designations of the HWP NDP in the Local Plan. It was noted that Hengrove Park boundary is awaiting finalisation and at the time of LPR is not complete. It was request that this is</p>	<p>37, 118, 286, 372, 442, 486, 573, 583, 603, 615, 616, 621, 623, 635, 637, 646, 655, 663, 791, 793, 802, 805, 810, 820, 858, 861, 871, 894, 907, 909, 954, 964</p>

Key Themes	Respondent References
<p>granted LGS status once final.</p> <p><i>Comments neither in support nor objection (25):</i> These included:</p> <ul style="list-style-type: none"> • Amount of land protected should increase: One respondent referred to paragraph 10.5, which states one fifth of the City's land is open space and that this will be maintained. Three respondents considered that the overall proportion of green space should increase as housing and population density increases, especially as green space in Bristol was considered to be less than other cities. Specific comments were raised in relation to the quantum of land as follows: <ul style="list-style-type: none"> ○ One respondent stated that green spaces, especially in densely populated or deprived areas, need protection which is obligatory for developers to adhere to. ○ One respondent referenced the Parks and Green Spaces Strategy, which stated that there is an 18 sqm standard per capita. It was stated that Bedminster and Southville only have 13.36 sqm and Hotwells and Harbourside 10.81 sqm, yet the development policies would further reduce provision in these areas. • Prioritising integrated planning of Green Infrastructure: One respondent stated that Green Infrastructure initiatives seem lacking and referenced as a token gesture, rather than integral to city planning. i.e. unlocking potential for new urban green spaces in the city. It was suggested that Bristol can do much more as a previous Green Capital. • Consideration of the wider benefits of Green Infrastructure: Beyond amenity value, a number of respondents considered that the policy should recognise the additional value that these spaces can have: <ul style="list-style-type: none"> ○ One respondent stated that there is a wide body of evidence that green spaces and nature provide essential benefits for health and wellbeing, and this should be referenced within the Plan. ○ Several respondents considered that green spaces play a key role in supporting urban wildlife and providing ecological benefits, and should be given the protection and funding they deserve. It was suggested that the City needs more resources for the management of and ongoing assessment of SINC and LNRs; to recognise that some green spaces are sensitive and that wildlife in these areas needs protection i.e. certain parts of reserves/parks are not suitable for events or large gatherings of people. ○ One respondent requested that green spaces of all types are recognised as critical to the character of the area. ○ Three respondents considered that green spaces should be recognised for their role in climate change and as sites to mitigate the risk of flooding, help reduce pollution and improve air quality. Green spaces should also be recognised for their value in renewable energy generation and carbon capture through tree planting, local food production as well as biodiversity to ensure species survival. • Preserving Garden Land: One respondent suggested an addition to retained policies list after DM21 (Development of Private Gardens), to include guidance PAN6 "Off-Street Residential Parking in Conservation Areas". • Accessibility: Three responses requested that the Plan clarify whether these spaces will be privately or publicly owned, with one comment advising against 	

Key Themes	Respondent References
<p>the creation of additional private space. One respondent requested a full review be conducted of the accessibility of all parks and green spaces, and green areas around new housing, to include how to minimise misuse. Two comments suggested that public space that is privately owned should have a clause allowing the public use of land which would support the interests of democracy.</p> <ul style="list-style-type: none"> Existing Designations: One respondent queried the role of existing designations from the existing local plan, where it was assumed that the existing suite of designations e.g. SNIC and Prominent Hillside designations would remain. It was questioned by some respondents as to whether an accompanying document such as an SPG will be developed to provide this guidance/include as an appendix to the plan. Enhancing a Green Infrastructure Network: It was suggested by one respondent that paragraph 10.1 should include a more overarching introduction on GI rather than just open space. It was stated to be important to strengthen commitment to GI, given pressure to meet housing targets. Concern was raised that the existing policies are not providing an effective framework for maintaining and enhancing GI network. References to both Green and Blue Infrastructure: One respondent stated that Green and Blue infrastructure are a crucial part of a prosperous city. Presentation of Green Spaces: It was suggested by one comment that the Plan would benefit from an interactive and more detailed form of GI map of Bristol. It was also noted that there is a lack of policy related directly to biodiversity and ecology. Location specific comments: <ul style="list-style-type: none"> One respondent expressed concern about the lack of green space allocated within the Clifton Down area. It was requested by one respondent that Bristol ensures no net loss of green spaces and biodiversity and request a net gain. It was commented that is important currently in locations adjacent to existing allocations, such as Western Slopes, Inns Court, Knowle West Health Park, Airport Road/Hengrove Way and Kingswear Road/Haldon Close. It was suggested that allocations are revised from 'Housing' to 'Housing and Open Space'. Specific reference was made to that land at Cumberland Road (Brunel Picnic Area), mentioned in the Parks and Green Spaces Strategy for Bedminster and has been omitted, as has the need to keep a hectare of green space around Cumberland Basin. A general request was raised by one respondent that BCC works to ensure the right designations for green spaces in Hartcliffe, Withywood and Bishopsworth. <p>One respondent commented that there is no policy within the Plan that addresses the reversal of the loss of Bristol's tree canopy cover, which needs to be addressed in the plan. It was considered that currently the Plan threatens to reduce space available for tree planting, without making proposals for compensatory open space allocation or further tree planting, through removal of Green Belt, rezoning local open space as development allocations and infilling in residential areas. Reference was made to the Bristol One City Plan, which makes a commitment to double tree canopy cover to 24% by 2046. It was stated that given the One City</p>	

Key Themes	Respondent References
<p>commitment and Climate Emergency declaration, absence of any planning policies to achieve tree cover goals is surprising.</p> <p>One respondent suggested that the Local Plan needs to explore in some detail how it will encourage desirable and prevent undesirable development in the categories of international aviation and shipping, F-gases, waste, agriculture and land-use, transport, buildings, industry and power. It was commented that policies related to green infrastructure touch on some of the above issues which will need to be addressed by the Plan, however, concern was expressed that this does not read like a document setting out the direction which will shape the City to meet the needs of the future.</p>	

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 71 Comments from statutory bodies and partnerships

Consultee	Reference
<p>Sport England (1): It was noted that paragraph 10.4 of the Plan supports the need to protect playing fields. Sport England would be very concerned if any development that includes existing sport and recreation land does not include adequate replacement in terms of quality, accessibility, management, and maintenance. Sport England will object to any planning application which would result in loss or prejudice the use of playing fields, land used as playing fields or allocation for playing field, unless it meets with one or more of 5 specific exceptions. Reference was made to Sport England's Playing Field Policy and Guidance document online.</p> <p>It was commented that Sports England promotes making use of existing resources to contribute to sustainable development by reducing need for additional facilities; for example, making school sports facilities available for wider community use - expanding this principle to Academies and other privately-owned sports facilities. Sports England promotes wider use of existing and new facilities to serve multiple user groups and will encourage potential providers to consider opportunities for joint provision and dual use facilities in appropriate locations.</p>	Ref. 442
<p>Natural England (1): Natural England welcomed the focus on green space and encourage BCC to fuse this with the Green Infrastructure Strategy being developed to support the JSP and Joint Local Transport Plan. Natural England strongly endorsed key principles set out in the JSP for a step change in green infrastructure delivery and stated that they would like to see that translated into GI and green space investment priorities for Bristol.</p> <p>Natural England considered that the West of England has a unique opportunity to lead the way developing a strategic plan for GI and nature which responds to national priorities like the Government's 25 Year Environment Plan and local aspirations to grow the city-region in a sustainable green way. It was noted that evidence points to interdependency of economic prosperity, healthy resilient environment and healthy vibrant communities. Representation also cited health and wellbeing benefits of contact with nature, and that service delivery can be made more effective and economic by being joined up.</p>	Ref. 820

Consultee	Reference
<p>Natural England considered that the existing GI policies were good, however, that these should be updated to reflect local and national ambitions, including updated NPPF and 25 Year Environment Plan; this would include net biodiversity gain, as it was commented the Government intends to bring a mandatory approach to net gain. Natural England encouraged BCC to work with other WoE local authorities to develop a co-ordinated policy and delivery approach based on Defra metric. It was noted that net gain did not feature in the Local Plan Review.</p> <p>In addition, the inclusion of GI standards was suggested, where it was commented that Natural England were leading consolidation of national GI standards and would continue to work with Bristol and WoE authorities to establish better ways to deliver GI to meet needs and bring multiple benefits. It was commented that urban intensification in Bristol would mean existing green spaces will have to work much harder and be augmented by new spaces, better connectivity and innovative design. Reference was made to Nature Recovery Network, where it was stated that WoE Nature Partnership's work on ecological network is evolving into national drive for nature recovery networks. It was suggested that real attention needs to be paid to value of urban wildlife and networks it depends on.</p>	
<p>Environment Agency (1): It was requested that the Green Infrastructure Policy / supporting text also mentions preserving the floodplain/making space for water. Reference was made to the Bristol Frome Reconnected project as an example.</p>	Ref. 964

50. GI1: Local Green Space

Overview: In total, 13 respondents made 14 comments regarding policy GI1 Local Green Space (LGS). Key themes are identified in the table below.

Table 72 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>Criteria for Local Green Space:</p> <p><i>Comments in support (2):</i> One respondent supported the policy in principle however noted that it is yet to be tested in Bristol's context. Support for designation of Destination Parks, Traditional/Multifunctional Parks, Town and Village Greens and Local Nature Reserves as LGS. It was stated by the respondent that they would expect further sites to be added to LGS following LPR consultation. One respondent considered that the identification of LGS in the Plan is consistent with NPPF and that criteria in 100(b) of NPPF have been applied.</p> <p><i>Comments in objection (1):</i> One respondent objected to policy GI1, as it was considered to apply a narrow interpretation of LGS contrary to NPPF and NPPG. It was commented that the NPPF or NPPG do not impose rigid or limited criteria, rather overarching consideration of significance of green spaces to the community they serve. It was considered that the Council have misinterpreted para 100 of NPPF as specifying a finite number of "values" which can be applied to LGS. To apply these to assess suitability of LGS sites is flawed and has excluded suitable candidate sites such as Stoke Lodge. It was commented that the values offer guidance only and it is only necessary to identify one attribute, namely special value to the community.</p> <p><i>Comments neither in support nor objection (9):</i> One respondent commented suggested that the requirement for LGS to "offer a unique and irreplaceable provision to that community" (paragraph 10.9) is not a test provided for by NPPF (2019) or the PPG, and should be deleted.</p> <p>Two respondents suggested that all current and future allotments and smallholdings should be designated as LGS, as opposed to ROS, as it was considered that they fulfil all of the five LGS requirements and should be preserved beyond the Plan Period for their role in food security. One respondent suggested that green space along rivers should be given LGS designation, as one of the criteria of the designation is to protect wildlife corridors.</p> <p>One respondent commented that paragraph 10.7 implies that all LGS will have unique characteristics, which was considered to be too restrictive. LGS values table in New Protection for Open Space does not include unique character or nature as a column. Proposed supporting text amendments to include that 'Land identified as Local Green Space is specially protected and will be retained as open space'. It was suggested that ancillary development examples should be provided that relate to other uses e.g. a bird hide.</p> <p>One respondent stated that green spaces need to be considered in the context of the local area, to include built form and current levels of provision, alongside socio-economic factors such as deprivation. It was suggested that another criteria</p>	<p>169, 291, 486, 607, 635, 646, 648, 807, 808, 849, 909</p>

<p>measure lack of trees and other green spaces in locality or limited amount of housing with access to gardens.</p> <p>One respondent suggested that green space along rivers should be given LGS designation, as one of the criteria of the designation is to protect wildlife corridors.</p> <p>One respondent queried why only some sites in Green Belt and neighbourhood planning areas are given LGS designation and others have not.</p>	
<p>Protection of Local Green Space</p> <p><i>Comments in support (1):</i> One respondent expressed support for the protection offered in the Plan to Local Green Spaces. It was encouraged that the Council create more green spaces as new neighbourhoods are built.</p> <p><i>Comments neither in support nor objection (2):</i> One respondent made a comment that the threat or experience of street harassment or violence in public spaces can have impacts on women feeling safe to access and experience those spaces. It was requested that this is considered when public spaces are designed and maintained to acknowledge the impact of gendered access to public space.</p> <p>A suggestion was raised that in the protection and design of public spaces, there should be multiple path options and entrances and exits in parks so that possibly threatening behaviours, such as stalking, can be avoided; in addition, more street lights, emergency phone boxes, multilingual signs and maps, and conscious design of vegetation in parks, green spaces and urban greenways to ensure visibility and openness, to encourage more people to feel safe to use these spaces. It was suggested that community watch groups and staff who are trained to understand the issues and provide appropriate support, alongside visible displays indicating what behaviours are welcome, could also help to enhance this. Concern was raised that these issues need to be taken in to consideration when planning changes or developing parks and green spaces and for any plans to use these spaces in the future to ensure that the impact on safety is included.</p> <p>One respondent stated that due to the lack of green space in areas such as Easton and Lawrence Hill, all green space should be designated as LGS unless proven otherwise.</p>	<p>309, 797, 811</p>

51. GI2 Reserved Open Space

Overview: In total, 21 respondents made 23 comments regarding policy GI2 Reserved Open Space. Key themes are identified in the table below.

Table 73 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>Definition</p> <p><i>Comments in support (1):</i> One respondent expressed support in principle, however noted this is a new policy yet to be tested in a Bristol context. It was suggested that the policy make explicit that where an open space forms part of wildlife network or is identified in developing Nature Recovery Plan as having potential to fill gaps in the network, this is important part of its 'open space function'.</p> <p><i>Comments in objection (3):</i> One respondent stated that there is no national policy or guidance advising introduction of ROS, and that sites therefore are either LGS or not. It was expressed that an ROS category seems confusing, overcomplicated, unnecessary and at odds with a 'positively prepared' Plan. It was commented that GI2 states the ROS sites will be re-assessed during future reviews of the plan and neighbourhood plans, which is contrary to the concept of LGS allocation set out in the NPPF, which states they should be capable of enduring beyond the end of the plan period.</p> <p>Two respondents suggested deletion of the policy; one respondent stated the policy be removed on the basis that the NPPF does not reference Reserved Open Space, nor does the policy identify an existing issue with loss of open spaces in the City which needs to be addressed. It was considered to be unduly restrictive, unsound; lacking in evidence and to potentially undermine housing delivery which is a key objective of the plan. It was considered that BCC's approach to specifically designate open spaces under draft policy GI2, whilst at the same time recognising they do not meet the LGS criteria, is an inappropriate strategy that is inconsistent with the NPPF.</p> <p>It was considered by one respondent that the policy wording was unclear and repeats provisions of paragraph 97 of NPPF and also Core Strategy policy BCS9. The first criterion in that policy was stated to be particularly unclear, where it was queried how the applicant would demonstrate open space to be no longer required. It was also queried how the 'function' of space is defined. It was commented that the final sentence in the policy erroneously refers to LGS as opposed to ROS.</p> <p><i>Comments neither in support nor objection (8):</i> One respondent expressed reservations with this policy based on a lack of clarity on its relationship and importance compared to the existing green space designation. It was commented that a schedule of how the various designations apply to individual green space would be beneficial. It was commented by one that the terminology on Local Green Spaces and Reserved Open Space was confusing and not well understood, with a suggestion that all ROS should be LGS in order to afford full protection. Two respondents commented that the use of the term 'reserved' sounds as if it is reserved for developed and it was suggested that the term should be revised to</p>	<p>439, 442, 607, 612, 646, 776, 791, 805, 807, 825, 849, 861</p>

<p>'currently reserved open spaces' or 'currently protected open space'</p> <p>It was acknowledged that the methodology was not likely to be as simple as meeting the colour-coded five-column criteria, as there are plenty of Reserved Open Spaces which meet at least one of these. It was commented that too much emphasis is on ROS being for recreational uses and that it should be clear of other functions, including landscape value or biodiversity.</p> <p>One respondent stated that all school playing fields should be LGS and therefore afforded maximum protection for children. It was suggested that allotments should be LGS not ROS, as it was considered that these can be highly important in deprived areas or areas with lower access to private gardens.</p> <p>One respondent stated that Green and Blue infrastructure are a crucial part of a prosperous city; however, stated that the draft Local Plan is lacking in developing a deliverable and significant GI vision, linking policies around climate change, around climate change, transport, health, pollution, townscape character, place-making, biodiversity and flood prevention. It was suggested that the Plan would benefit from an interactive and more detailed form of GI map of Bristol. It was also noted that there is a lack of policy related directly to biodiversity and ecology.</p>	
<p>Protection of Reserved Open Space</p> <p><i>Comments in support (1):</i> One respondent supported the protection of ROS with particular reference to the ROS02003 and ROS02011 sites. It was stated that the loss of playing fields and open space is not considered to be acceptable in an area that was part of Bristol City Council's Wild City project.</p> <p><i>Comments in objection (1):</i> One respondent commented that ROS under policy GI2 is not supported by national policy; and that not all sites have a defined formal 'open space function'. It was stated that considerations involving loss of open space through planning applications can be carried out on a site by site basis and therefore, it was suggested that this policy is not required or justified and could undermine housing delivery. The overall suggestion was made that this policy is deleted however it was commented that, if this policy is brought forward, BCC would need to ensure regular publication of open space assessment to set out capacities and requirements.</p> <p><i>Comments neither in support nor objection (9):</i> Several comments referred to the need to state in the policy that development requiring the loss of ROS space will not be permitted. It was suggested that their open space functions should instead be improved and diversified, and only proportionate ancillary development supporting the ROS function (such as creating a biodiversity net gain) should be permitted.</p> <p>It was suggested any loss of ROS space through development may be permitted if the ROS is no longer required for its open space function; and a deficiency of open space provision would not be created through its loss, or that the loss could be sufficiently mitigated. One respondent suggested that the policy could be re-worded to allow for ROS development for sites in private use which have limited public use or are in poor quality and could be enhanced through the release of part of the land for development.</p>	<p>100, 309, 486, 621, 635, 791, 805, 807, 833, 855, 888</p>

<p>It was considered by two respondents that the ROS designation should be used sparingly, if at all, as there is a need for the Plan to have strong reasons not to be using the nationally recognised LGS designation. One respondent stated that it is not clear within the policy how Reserved Open Spaces will be re-assessed during of future reviews of the Local Plan and may be reviewed through any new neighbourhood plans.</p> <p>Two respondents suggested that all allotments should be designated as LGS, not ROS, given the growing importance of local food production for climate change mitigation and resilience and because all allotments fulfil all of the five LGS requirements.</p> <p>One respondent commented on the need for public spaces to be designed to acknowledge the impact of gendered access to public space and address issues around safety, harassment and violence in public spaces for women.</p> <p>One comment requested that more detailed information on the assessment and methodology of ROS designation be made available to better comprehend the application of the policy in practice.</p>	
--	--

Table 74 Comments from statutory bodies and partnerships

Consultee	Respondent Reference
<p>Sport England (1): It was noted that Para 10.13 refers to standards for open space and playing pitches. Sports England advises that it promotes the deliverability of projects as identified in a playing pitch/built sports facility strategy over the use of generic standards. Representation set out the limitations of applying standards as the NPPF does not advocate their use and requires specific evidence of the need for provision. It was commented that, to seek provision of a specific facility type from an individual development, there must be a robust assessment of need which is developed to provide a specific local requirement, and informed by appropriate feasibility studies etc. It was stated that standards can be too generic - e.g. requiring a quantum of new provision for a given population, where a more appropriate way to meet need may be to improve quality or access of existing provision. Reference was made to Sports England Playing Pitch Calculator that can be used with data collected from a Playing Pitch Strategy.</p>	442

52. GI3 Incidental Open Spaces

Overview: In total, 10 respondents made 10 comments regarding policy GI3 Incidental Open Spaces. Key themes are identified in the table below.

Table 75 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>Definition:</p> <p><i>Comments in support (1):</i> One respondent expressed support for the policy in principle, however noted that it is a new policy yet to be tested in a Bristol context. It was stated that where IOS forms part of wildlife network, or is identified in developing Nature Recovery Plan as having potential to fill gaps in the network, this is important part of its 'open space function' and there should be a statement to make this clear in the policy to prevent loss of green infrastructure which could or does form link in the network.</p> <p><i>Comments in objection (2):</i> Some respondents stated that incidental open spaces are not defined, and the published evidence report New Protection for Open Space document makes very limited reference to the specific designation or relevant criteria for such spaces. It was stated that the policy could relate to a wide range of open spaces, inhibiting ability to deliver housing requirement through intensification/optimising density. It was stated to be unclear how this policy would be applied to new development proposals where amenity space is proposed to be reallocated within a proposal to achieve an optimum density for the site. If rigidly applied, this could restrict development coming forward or lead to protracted negotiations to agree the principle of development on a particular site.</p> <p>It was suggested by some respondents that the policy is either deleted, or amended as proposed, to include that development involving the loss of incidental open space will be permitted where it is demonstrated that the space is not locally important for recreation and leisure use; or townscape and visual amenity; and that proposals that would re-provide an appropriate level of open space in line with other policies in the Local Plan Review will be permitted.</p> <p><i>Comments neither in support nor objection (5):</i> One respondent suggested that policy text should be repeated in the New Protection for Open Space document, as policy GI1 and GI2 are. It was also suggested that Important Open Spaces should be singular, as per GI1 and GI2, to become 'Incidental Open Space'. The addition of climate change mitigation or biodiversity as criteria for IOS were suggested.</p> <p>Some respondents considered policy GI3 to be problematic for the following reason: the definition of 'incidental open spaces' could constitute a wide range of open spaces (both soft landscaping and hard landscaped areas) and inhibit the overall objectives to deliver regeneration of Bedminster Green.</p> <p>One respondent stated that Green and Blue infrastructure are a crucial part of a prosperous city; however, stated that the draft Local Plan is lacking in developing a deliverable and significant GI vision, linking policies around climate change,</p>	<p>490, 524, 607, 646, 647, 648, 656, 861</p>

Key Themes	Respondent References
<p>around climate change, transport, health, pollution, townscape character, place-making, biodiversity and flood prevention. It was suggested that the Plan would benefit from an interactive and more detailed form of GI map of Bristol. It was also noted that there is a lack of policy related directly to biodiversity and ecology.</p>	
<p>Protection of incidental open space <i>Comments in objection (1):</i> Objection was made to policy GI3, which states that development involving loss of incidental open space, where there is local recreation or leisure use, will not be permitted as it was considered to be too restrictive. It was suggested that the policy should be amended to permit development in cases where it can be demonstrated that benefit outweighs harm.</p> <p><i>Comments neither in support nor objection (1):</i> One respondent suggested that the policy should consider impacts of development on land adjacent to green space as well as the direct loss of the space to development.</p>	627, 888

53. GI4 Stapleton Allotment and Holdings – Food Growing Local Green Space

Overview: In total, 9 respondents made 11 comments regarding policy GI4 Stapleton Allotments and Holdings – Food Growing Local Green Space. Key themes are identified in the table below.

Table 76 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>Definition as Local Green Space:</p> <p><i>Comments in support (3):</i> Some respondents expressed support for this policy and welcomed the designation of Stapleton Allotments and Smallholdings as LGS. It was commented that the policy text, which highlights its importance as a food growing area, was supported.</p> <p>Alongside support for the principle of the policy, one respondent considered that all allotments and smallholdings are valuable food growing sites in the City and have soils that are enhanced by decades of cultivation; it was suggested they should therefore be given LGS designation and the additional protection that would afford to them. It was specifically requested by two respondents that this policy be extended to include all allotments and smallholdings across the City, including the Council owned meadow of Yew Tree Farm in South Bristol which is an integral part of their sustainability of their farm enterprise.</p> <p>It was commented that given pressure from new housing, which would likely mean demand for allotments would increase, the loss of sites must be resisted. It was stated that allotments are part of the local fresh food system and that it was expected the City recognise that, within a Climate Emergency and threats to food growing areas, that resilience would increasingly rely on local fresh food.</p> <p><i>Comments neither in support nor objection (1):</i> One respondent stated that all allotments within Bristol should be protected as Local Green Space.</p>	603, 621, 646, 802
<p>Protection of Stapleton Allotments:</p> <p><i>Comments in support (6):</i> General support was expressed by some respondents for Draft Policy GI4 Stapleton Road Allotments and Holdings – Food Growing Local Green Space.</p> <p>Alongside support for the policy, some respondents requested the extension of policy protection to the other allotments in the City and/or the entirety of Stapleton Allotments and Holdings, not just the area south of the M32. The reasons for this request were provided by one respondent as follows: during first round of Local Plan consultation, a map was not made available with the proposed site for consultation; the arguments around quality of soil apply equally to the land both north and south of the M32 within the 'Blue Finger'. Concern was expressed that if BCC are protecting the area to the south of the M32 because of its best and most versatile (BMV) soil, then the area to the north should also be protected. It was stated that historically the north and south sections of the Stapleton Allotments and Holdings were part of one parcel of land; and that there are tenancy agreements and smallholding plots which extend across the M32; and that administratively, BCC describes the whole area – both north and south of the M32 – as one parcel of land.</p>	196, 321, 610, 635, 646, 797, 802

Key Themes	Respondent References
One respondent commented that they would hope that land adjacent owned by BCC, however, in the South Gloucestershire boundary, would also be retained for food growing and supported by this policy.	

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 77 Comments from statutory bodies and partnerships

Consultee	Respondent Reference
<p>South Gloucestershire Council (1): SGC noted the designation of the Stapleton Road allotments as Local Green Space for food production. It was stated that the site was previously designated as a site to deliver a Park & Ride scheme for the M32 corridor with objectives to reduce the number of vehicles entering the city centre from the north, reducing congestion and improving air quality.</p> <p>Notwithstanding the value of the allotments, South Gloucestershire consider that it is important to ensure that the option to provide a Park and Ride site adjacent to the M32 which can intercept trips on the Strategic Road Network, is retained. In this context SGC still considers that a change in designation is premature at this stage, given that the importance of an M32 Park and Ride is recognised within the JLTP in support of the Joint Spatial Plan and this may require access from the allotments. It was commented that SGC will continue to work with Bristol City Council to consider options for providing a Park and Ride to serve the M32 corridor.</p>	Ref. 610

54. Food systems and Pollinating Insects

Overview: In total, 6 respondents (Refs 486, 635, 646, 810 646, 802) made comments regarding the section relating to Food systems and Pollinating Insects. The key themes were identified as follows:

- Whilst there was support for this policy, two comments considered that there needed to be a more comprehensive plan to protect nature-friendly food growing sites and provide support to organisations tackling food poverty. A further comment considered that a list of local-gardens for rent should be compiled to enable greater accessibility to food-growing spaces.
- Two comments considered that all allotments / small holdings needed to be recognised and protected for special quality of soils and importance of food growing.
- Two comments considered that the policy should be strengthened in support of an aim to achieve a Sustainable Food City award and work towards a Gold Award by 2020.
- One comment considered that it was illogical that this topic did not have its own policy reference, whereas a second comment considered that this section appeared to be an afterthought. It was not clear from the policy whether the council will be seeking provision of specific plant-species for pollinators, with a number of respondents stating that a specific 'Biodiversity' section would be better.

55. Section 11: Transport

Overview: In total, 9 respondents made comments regarding the introduction to Section 11, Transport. Key themes are identified in the table below.

Table 78 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>Introduction to Section 11: Transport</p> <p><i>Comments in objection (1):</i> One comment stated that the Transport section and policies should be strengthened and otherwise risks a disconnect between planning and transport. It stated that this is especially so because the Bristol Transport Strategy and the Joint Local Plan does not set out a clear plan. It was stated that the London Plan is a good reference for transport policies. It was stated that the transport policies need to address the impact of increased populations in the growth areas and demand that measures are implemented such as a chargeable Clean Air Zone, a Workplace Parking Levy, parking controls and physical measures.</p> <p><i>Comments neither support nor objection (8):</i> Several comments considered that the policies in Section 11 need to be more radical, with stronger emphasis on sustainable travel due to the climate emergency. The comments considered that the policies do not set out a clear enough direction on how they will ensure sustainable development.</p> <p>Two comments raised specific concerns over the plans for Whitchurch Lane, stating that while at this stage, it has been confirmed that the draft Local Plan does not make an assumption that Whitchurch Lane will be used as part of any orbital route, there is strong local opposition of the prospect of development of this route as a ring road. Clarity on this potential development was requested to understand the long term planning for South Bristol.</p> <p>One comment raised concern that policies in Section 11 do not include taxi ranks, despite being an important and sometimes only accessible public transport for disabled people. It stated the need to consult disabled people and taxi drivers on their needs.</p> <p>One comment made reference to the Bristol Street Harassment Project survey and levels of harassment on public transport. It stated that the promotion of safe, well-lit parking areas with surveillance is required as well as safety enhancements to public transport waiting areas and facilities. The safety and accommodation in public spaces of women, pushchairs, wheelchairs, cyclists and pedestrians was also commented on and suggested for inclusion in the policy.</p>	<p>309, 372, 581, 584, 594, 612, 614, 807, 858</p>

56. T1: Development and transport principles

Overview: In total, 34 respondents made 30 comments regarding policy T1 Development and transport principles. Key themes are identified in the table below.

Table 79 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy T1:</p> <p><i>Comments in support (5):</i> The comments expressed general support for the policy. One comment stated specific support for the plan's priorities towards non-private car transport, however requested more publicity of car clubs and incentives.</p> <p><i>Comments neither support nor objection (17):</i> Several comments felt that the policy is not strong or radical enough, and needs a stronger position against the private car, particularly given the climate emergency, with the suggestion that the policy aspires to make the city car-free by 2030.</p> <p>One comment stated the definition of 'sustainable travel' in the policy is ambiguous, while another felt the wording of the policy generally is unclear. The relationship between the Bristol Transport Strategy and the plan was queried, given that the BTS is not yet published and therefore cannot inform the T1 policy. Some comments also raised concern about the overall interrelationship between the Joint Local Transport Plan 4, The Bristol Transport Strategy and the Local Plan Review, as well as the evidence base for the policy. One comment stated that continuing studies cited in the Joint Spatial Plan Emerging Findings Transport Report need to be completed to inform draft Local Plan and form part of technical evidence.</p> <p>Several comments related to cars, including a suggestion that parking on pavements should be illegal and that students should be prohibited from bringing cars to the city unless they have specific circumstances requiring one (e.g. disability).</p> <p>Some comments raised concern that the impacts of increased density as proposed through the plan are not sufficiently taken into account in policy T1.</p> <p>With regard to cycling, comments stated that there is a need for more explicit references in the policy to improving the cycle network, while another stated that cycle and walking routes should be segregated in new developments.</p> <p>It was suggested that a policy for a 'walkable' Bristol is needed, and that a policy within the Green Infrastructure section of the plan on walking and cycling routes could strengthen the policy in this regard. One comment stated that more funding is needed to make walking accessible, including removal of street clutter (such as on Whiteladies Road).</p> <p>One comment stated the need for the policy to provide a '24 hour' city with regards to transport.</p>	37, 165, 273, 428, 443, 604, 610, 614, 632, 646, 760, 791, 794, 805, 807, 816, 818, 823, 829, 861, 865, 889, 894, 963
<p>Needs of disabled people</p> <p><i>Comments in support (3):</i> Two comments expressed support provided that</p>	76, 100, 116, 610, 807, 963

Key Themes	Respondent References
<p>additional disabled parking is provided in Bristol through implementation of a Hidden Disabilities Blue Badge system. One comment stated the need for a range of disability groups to be consulted on public transport proposals.</p> <p><i>Comments neither support nor objection (2):</i> One comment stated that developments should be expected to make appropriate provision for the transport needs of disabled people, and this needs to be more creative, as many disabled people can't use public buses and trains. It stated that Stapleton Rd and Lawrence Hill stations are not accessible to all local disabled people.</p> <p>One comment expressed concern about walking distances to Metrobus stops, local bus stops and Metrowest railway stations, while stating that pavements and access to new development needs to be fully accessible.</p>	

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 80 Comments from statutory bodies and partnerships

Consultee	Reference
<p>South Gloucestershire Council (2): SGC concur with the direction of policy T1, which outlines development will be located in accessible locations along, or close to, sustainable transport corridors; minimising the need to travel by private car and maximising opportunities for walking, cycling and public transport. Developments will be expected to make appropriate provision for the transport needs of disabled people.</p>	610
<p>Highways England (1): Support Draft Policy T1; comment that in order to maintain the safe operation of the SRN, whilst allowing significant growth, there is a need for the new growth, and existing areas, to be less reliant on the private car for travel.</p>	632

57. T2: Transport schemes

Overview: In total, 23 respondents made 29 comments regarding policy T2 Transport schemes. Key themes are identified in the table below.

Table 81 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General</p> <p><i>Comments in support (4):</i> Support was expressed by respondents for the focus of the policy on sustainable transport and creating a co-ordinated multimodal network which aligns with the wide transport objectives in the West of England region.</p> <p>One comment stated specific support for the aim to safeguard railway sites and associated land for rail infrastructure improvements. It was stated that this should not only include committed new stations through Metrowest project but also areas with significant population and / or employment on existing rail routes, such as Ashton Gate, Constable Road and St Anne's Park. Support was also stated for the reference to protecting transport facilities including freight sidings.</p> <p><i>Comments in objection (1):</i> One comment referred to local community objection to a proposed plan to extend the new South Bristol link road along Whitchurch Lane in order to provide a connection with the A4. In addition, the respondent stated that improved public transport is a particular concern for areas currently poorly served such as Hartcliffe and Withywood.</p> <p><i>Comments neither support nor objection (11):</i> Several respondents raised concerns that the proposals in policy T2 are not sufficiently radical, particularly in relation to the aim of creating sustainable or low energy transport networks. Several respondents also raised concern about the co-ordination of transport schemes with strategic development, requesting more information on timescales, more community involvement and more evidence of cross-boundary working to create an integrated approach across the West of England and across transport modes. One comment stated that the approach should be dynamic and transport requirements tailored to each site.</p> <p>Suggestions were made by respondents for the following transport proposals:</p> <ul style="list-style-type: none"> • Tram system as per Sheffield and Manchester; • Reopening of Clifton Rocks Railway for transport and tourism; • A detailed proposal for a new bus network in Bristol; • Introduction of a low emissions zone; an aspiration to make the city car free by 2030; and, • The use of road space to create green cycle corridors. <p>Two comments referred to the evidence base of the study. One stated that the Joint Local Transport Plan 4 programme is flawed, with huge funding gaps, so queried whether the stated proposals in policy T2 were actually deliverable. Another commented that there is no indication of the studies being undertaken or other evidence for the policies and requested clarity on this point.</p>	<p>133, 165, 401, 403, 541, 604, 610, 632, 646, 664, 830, 838, 858, 862, 865, 871, 873, 889, 895</p>

Key Themes	Respondent References
<p>One comment stated that the policy should provide a positive framework for the development and growth of Bristol Airport, and proposed that it includes a specific policy relating to the airport.</p>	
<p>Specific schemes <i>Comments neither support nor objection (4):</i> Comments made reference to specific schemes that respondents considered should be pursued in Bristol to bring improvements to the transport network and referenced in the policy:</p> <ul style="list-style-type: none"> • M4 J18a; • South Bristol Orbital road; • Callington Link Road; • Rail stations at Lockleaze, Horfield, Ashley Down, Filton North and Henbury to Shirehampton, Avonmouth Dock, St Andrews Road and Severn Beach; • Improved bus connectivity from central Bristol to the north east fringe (extension of Metrobus service to Yate, with potential to extend to additional destinations in the area, eg Pucklechurch); • Provision of additional and expanded park and ride sites; • Improved bus facilities (eg bus lanes); • Mass transit to the north-east fringe; • Reallocation of space to priorities public-transport, cycling and pedestrians; and • Improved cycle routes from the city centre to the city fringe. <p>In addition, one comment stated that South Bristol lacks a comprehensive, transport system which would be a central driver to economic advancement, and stated support for a review of additional options for a South Bristol Link.</p>	<p>610, 830, 871, 895, 963</p>
<p>Safeguarding land: <i>Comments neither support nor objection (5):</i> Two comments stated that the policy does not sufficiently safeguard land, with one stating that this could prejudice compulsory purchase procedures and another stating specifically that protection of Network Rail / railway land is very weak, which could be used for light rail or a transport corridor. One comment stated that land must only be safeguarded if there is sufficient evidence and demonstration of a proposed scheme being developed within the plan period, otherwise the policy is unsound.</p> <p>Two comments made reference to specific locations, requesting that the following locations are safeguarded:</p> <ul style="list-style-type: none"> • Kingsland Road waste transfer station land and trackbed (rail); • Bristol East & West yards (rail); • Barton Hill depot (rail); • Malago Vale sidings, and container depot (rail); • Existing bus depot at Lawrence Hill; and, • Existing bus depot at Hengrove. <p>One comment considered that the policy does not sufficiently safeguard bus services and raises concern that the proposals for residential development in the plan may be harmful to the future operation of Lawrence Hill bus depot.</p>	<p>823, 829, 889, 905, 963</p>

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 82 Comments from statutory bodies and partnerships

Consultee	Reference
North Somerset Council (1): NSC noted that Policy T2 refers to ongoing studies but does not identify the proposals. NSC provided comment to state that they reserve the right to comment on these at a future date and are willing to work with BCC regarding schemes that impact North Somerset.	403
Highways England (1): It is noted that Draft Policy T2: Transport Schemes has not been described in detail as further technical work is being undertaken.	632
<p>South Gloucestershire Council (2): Transport Schemes: SGC note that site allocations for the major transport schemes set out in the draft Joint Local Transport Plan and Joint Spatial Plan are not included at this current stage of the Bristol Local Plan. We recognise some of the difficulties in allocating sites for schemes where further technical work is required to identify preferred locations and for sites to be allocated accordingly (see also response to G14 Stapleton Road Allotments and Holdings – Food Growing Local Green Space).</p> <p>SGC note the designation of the Stapleton Road allotments as Local Green Space for food production. The site was previously designated as a site to deliver a Park & Ride scheme for the M32 corridor with objectives to reduce the number of vehicles entering the city centre from the north, reducing congestion and improving air quality. Notwithstanding the value of the allotments, South Gloucestershire consider that it is important to ensure that the option to provide a Park and Ride site adjacent to the M32 which can intercept trips on the Strategic Road Network, is retained. In this context SGC still considers that a change in designation is premature at this stage, given that the importance of an M32 Park and Ride is recognised within the JLTP in support of the Joint Spatial Plan and this may require access from the allotments. SGC will continue to work with Bristol City Council to consider options for providing a Park and Ride to serve the M32 corridor.</p>	610

58. T3: Car and cycle parking provision for residential development

Overview: In total, 24 respondents made 30 comments regarding policy T3 Car and cycle parking provision for residential development. Key themes are identified in the table below.

Table 83 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy</p> <p><i>Comments in support (5):</i> Of the comments in support of the policy, two respondents expressed support provided that additional disabled parking is provided in Bristol through implementation of a Hidden Disabilities Blue Badge system. One comment suggested that electric car charging points should be part of new developments.</p> <p><i>Comments neither support nor objection (15):</i> Several comments related to the implementation of parking standards. One comment stated support for the recognition that site specific circumstances will be taken into account in considering parking provision and suggested the policy should make it explicit that the parking standards are maximum figures, not desirable or precise targets. Another comment stated that the policy should recognise that in some instances it will be appropriate to support schemes with low or zero parking, for example in city centre locations. One comment stated that planning permission should not be granted for schemes which would be reliant on car use.</p> <p>One comment stated that they would like to see more radical proposals, for example for car free days in the city. Another comment stated that there is insufficient reference to creating a more walkable Bristol in the policy, and greater emphasis on this is required. One comment stated that a comprehensive parking strategy should be part of the future Plan, including easing current restrictive residents parking zones. One comment stated that development in Clifton Down should be car free.</p> <p>One comment stated that all new office or home development should have sufficient car club parking. However, two comments stated that restricting car club parking spaces to specific car clubs reduces competition, and stops residents forming their own co-operative car club. This could result in a higher cost to Car Club membership, reducing take-up and consequently the congestion and air pollution benefits attributed to car clubs.</p> <p>One comment considered that the policy is not fully aligned with the Bristol aspects of the Join Local Transport Plan 4, while another comment queried whether the existing Parking Standards Schedule should be revised given its current evidence base is 10 years old and will be applied to a new plan period to 2036.</p> <p>One comment stated that in some locations, such as city centre mixed use areas, provision of shared cycle space would be more appropriate, to cater for different user types during the day.</p> <p>One comment stated that there is currently insufficient taxi rank provision in new</p>	<p>37, 100, 116, 316, 420, 428, 541, 610, 632, 646, 751, 811, 816, 818, 838, 852, 861, 880, 891, 893, 963</p>

Key Themes	Respondent References
development sites.	
<p>Criteria for car parking provision</p> <p><i>Comments in support (3):</i> One comment expressed general support for the policy, while another comment welcomed the clear recognition within the draft policy that local and site-specific circumstances will be taken into account in determining the appropriate levels of parking. One comment stated the desire for allocated funds and a strategy to ensure that low parking provision in new developments does not adversely impact neighbouring communities.</p> <p><i>Comments neither support nor objection (2):</i> One comment stated that parking provision should be restricted where an area has or is allocated for public transport improvements, and that city centre car ownership should be reduced through parking restrictions, enforced car clubs and low emission zones.</p> <p>One comment stated that the policy assumptions are based on existing office environments being more densely occupied. It stated that a more appropriate parking standard would reflect the varying accessibility by bike across the city and considers that the uplift of 28% to cyclist mode share appears overly optimistic.</p>	420, 610, 627, 631, 751, 865
<p>Parking standards schedule</p> <p><i>Comments neither support nor objection (2):</i> This needs to be updated to respond to recent experiences of delivering residential development across Bristol's various areas.</p> <p>Support the overall principle of the policy but consider one bicycle parking space per 50m2 is too low. At a density of 10m2 per employee - this equates to 1 space every 5 employees. Suggest that this is revised to "one space per 40m2 of gross floor area" and that cycle parking should be secured and protected from the weather. Please see the Cambridge City Council Cycle Parking Standards Appendix D for reference.</p>	610, 870, 893

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 84 Comments from statutory bodies and partnerships

Consultee	Respondent Reference
<p>South Gloucestershire Council (3): T3 - Car and Cycle Parking Provision for residential development: SGC welcome the recognition of the local factors that inform the requirements for an appropriate provision of car and cycle parking for residential development. SGC concur with the direction of the policy text, both in terms of the design to be safe, useable, accessible and integral to the design of the development, as well as the quantity of parking based parking standards from its Site Allocations and Development Management.</p> <p>Policies which are influenced by a number of local factors including modal accessibility; car ownership levels; car club availability and potential, and on-street parking utilisation. BCC have maximum car parking standards for all development types including residential, and minimum cycle parking provision.</p> <p>BCC have maximum car parking standards for all development types including</p>	610

Consultee	Respondent Reference
residential, and minimum cycle parking provision.	
Highways England (1): It is noted that Draft Policy T2: Transport Schemes has not been described in detail as further technical work is being undertaken.	632

59. T4 Cycle parking provision for B1 office development

Overview: In total, 9 respondents made 10 comments regarding policy T4 Cycle parking provision for B1 office development. Key themes are identified in the table below.

Table 85 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy <i>Comments in support (4):</i> Two respondents expressed general support for the policy and its aims.</p> <p>One comment suggested that the proposals should be seen as a minimum and that a higher standard should be considered during the plan period at favourable locations. It considered that an essential aspect of the cycle provision is covered, safe and secure storage, with showers, lockers and drying rooms provided. Provision for visitors should also be provided.</p> <p><i>Comments neither support nor objection (4):</i> One comment stated that the policy cannot be fully understood without full alignment with the Joint Local Transport Plan 4. One comment stated concern that the parking standards are not the same across the West of England, including South Gloucestershire.</p> <p>One comment stated that cycle parking provision should be based on location rather than a blanket requirement. It states that the policy is not flexible enough, and cycle standards for individual developments should be based on forecasts of likely future modal share for cyclists within Transport Assessments.</p>	610, 621, 646, 816, 818, 829, 891, 963
<p>Minimum standards for parking spaces <i>Comments neither support nor objection (2):</i> Two comments expressed support for the premise of the policy but considered that one bicycle parking space per 50m² is too low and made a suggestion for an amended requirement of one space per 40m² of gross floor area. Support was expressed for the policy text referring to adequate changing, shower, storage and drying facilities. A reference was made to the Cambridge City Council Cycle Parking Standards.</p>	856, 867

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 86 Comments from statutory bodies and partnerships

Consultee	Reference
South Gloucestershire Council (1): SGC welcome the proposed increased levels of cycle parking provision and defined provision of complementary facilities (such as showers and lockers) at B1 office development in response to increasing levels of cycling across the region (a doubling of cycle use in the city in the last 10 years).	610

60. T5: Provision of infrastructure for electric and other low emission vehicles

Overview: In total, 44 respondents made 50 comments regarding policy T5 Provision of infrastructure for electric and other low emission vehicles. Key themes are identified in the table below.

Table 87 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy:</p> <p><i>Comments in support (6):</i> Of the comments in support of the principle of the policy, one comment suggested that it is essential that it is flexible given the emerging and changing nature of the technology. One comment supported installation of charging points in all new residential developments proportionate to homes built, while another commented that 50% of all new dwellings should have charging infrastructure. The inclusion of electric car club vehicles was strongly supported by one respondent.</p> <p>One comment expressed support for the policy in relation specifically to Lockleaze.</p> <p>One comment stated that while supporting the policy, it fails to mention bio-methane and Euro VI diesel, which has had much investment from bus operators. The respondent requested that a policy supporting-bio-methane is included.</p> <p><i>Comments in objection (3):</i> One comment objected to the policy on the basis that there is insufficient supporting evidence or justification, and would impact on viability of development. One comment considered that passive EV provision is not visible enough to demonstrate the existence of the infrastructure. One comment objected to the policy as it would encourage private car journeys and increase loss of private gardens to create parking facilities.</p> <p><i>Comments neither support nor objection (34):</i> The majority of comments expressed concern that the policy requirements would be too onerous for developers and may affect the viability of schemes, particularly in cases where an upgrade to electricity infrastructure would be required to accommodate the level of EV charging required. Similarly, many comments stated that the policy does not sufficiently consider the requirement to upgrade the network capacity and that consultation with energy suppliers would be required to ensure this policy is feasible. Some respondents therefore considered that the policy is not sufficiently evidenced or justified.</p> <p>Several comments expressed concern about the practicalities of the policy, stating that there is no prevailing charging technology for electric vehicles yet and therefore any requirements in the policy could become obsolete quickly. It was generally considered by these respondents that the policy is premature given that a national approach has yet to be set by Government, and that the requirements for EV charging may yet be implemented through building regulations, considered a more appropriate approach than planning policy. As such, some of these respondents considered the policy should be deleted until a national approach is</p>	<p>420, 428, 490, 504, 524, 610, 621, 626, 627, 646, 647, 648, 656, 657, 672, 791, 805, 807, 811, 812, 816, 818, 819, 829, 834, 838, 845, 856, 857, 865, 866, 867, 870, 877, 880, 882, 885, 888, 889, 891, 893, 895, 905</p>

Key Themes	Respondent References
<p>determined. One policy stated that given current levels of EV ownership, the requirement to provide 20% of car parking spaces as charging points from 2020 would be excessive and may result in underutilised facilities.</p> <p>Some comments raised concern over how the policy would be implemented and the EV charging points maintained, with one respondent suggesting that the policy does not sufficiently consider the potential costs to business owners or tax implications for individuals who benefit from charging their car at work. One comment suggested detailed parameters for EV charging.</p> <p>While one comment stated a desire to see all new office and home developments have ample charging points for electric vehicles, several other comments felt that an emphasis on electric vehicles should not undermine the priority of encouraging walking, cycling and public transport, as the aim should be to reduce all private vehicles on the road and prioritise the public realm.</p> <p>Several comments queried how the policy would be applied to developments that do not require on-site parking (for example Purpose Built Student Accommodation) or where development would use an existing car park. One comment stated that the development management approach to applications to create domestic driveways would need to be reviewed (e.g. through paving over a garden) as driveways would be required to install EV charging. It was suggested that living surfaces should be promoted for driveways to reduce loss of green space, in such a scenario.</p> <p>Several comments raised concern over the equality of the policy, particularly in relation to residents of housing types without a driveway. It was stated that these residents would be reliant on higher cost public and commercial charging and cannot take advantage of vehicle-to-grid battery storage. It was considered that this would most penalise poorer residents who are less likely to have a private parking space. It was also suggested that public charging facilities be required through the policy to address this issue.</p> <p>One comment stated that the policy cannot be fully understood without full alignment with the Joint Local Transport Plan 4.</p>	
<p>Residential development criteria</p> <p><i>Comments in objection (2):</i> One comment in objection considered that the policy is too prescriptive and ignores feasibility in delivery of housing sites, as well as issues of viability, and concerns around the provision of EV charging in communal or on-street parking areas.</p> <p>One comment stated that the policy should require at least 50% of dwellings to included active charging facilities and that the remaining 50% to have passive provision. It was suggested that at two rapid charging points are provided.</p> <p><i>Comments neither support nor objection (3):</i></p> <ul style="list-style-type: none"> One comment expressed concern about potential under-utilisation of charging facilities installed by requirement of policy T5, and stated that the policy should be flexible to avoid unnecessary burdens on developers and over- 	<p>322, 834, 867, 870, 888</p>

Key Themes	Respondent References
<p>demand on the energy network.</p> <ul style="list-style-type: none"> One comment stated that the Council should engage with the main energy suppliers to determine the network capacity to accommodate the requirements of the policy, and that the policy should be viability tested to ensure it does not harmfully affect housing delivery. One comment stated that the Parking Standards Schedule will need to be updated after the adoption of the LPR. 	
<p>Non-residential development criteria <i>Comments in objection (1):</i> One comment in objection suggested that the policy should be changed to require that for all developments which provide 1 or more car-parking space, at least 50% of those bays will be expected to included active charging facilities and all other bays will be expected to have passive provision.</p>	867

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 88 Comments from statutory bodies and partnerships

Consultee	Respondent Reference
<p>South Gloucestershire Council (1): SGC welcome the inclusion of provision for low emission vehicle infrastructure in residential and non-residential development. Since the issue of Bristol CC's previous LP consultation, the 4 authorities in the West of England have finalised a piece of evidence – 'Evidence Base Introducing Planning Policy for Electric Vehicles in New Developments' which may be helpful in the continued development of these policies.</p>	610

61. Section 13: Climate Change and Sustainability

Overview: In total, 29 respondents made general comments regarding Section 13. Key themes are identified in the table below.

Table 89 Summary of consultation responses to Section 13

Key Themes	Respondent References
<p>General Section-wide comments</p> <p>Comments in support (6): A total of 6 comments were in support of the overall draft policies within this section, stating support for the majority of principles and commending BCC for creating policies which seek to align with ambitious climate change.</p> <p>Comments neither in support nor objection (19): Whilst the vast majority of these comments were in support of the overall principles in the section, a large number considered that the policies did not go far enough in terms of defining policy requirements. Comments considered:</p> <ul style="list-style-type: none"> • Section not sufficiently ambitious: Several comments considered that the policies and wording are not ambitious enough, and the consequences of not demonstrating compliance are not strong enough. • Unclear 'zero carbon' meaning: Several comments considered that the definition of 'zero carbon' was unclear and should include regulated, unregulated and embodied emissions if the 2030 target is to be met. • Inappropriate to include climate change as a separate section: Several comments suggested that the overall title for the section is misleading and too focused on built form, and that climate change should be weaved as a 'golden thread' through every aspect of the Plan. Several considered that this section should only focus on 'new' built form requirements. • Insufficient coverage of climate change impacts of operational developments: A large number of comments considered that the policies only address 'new' built form and should be extended to limit undesirable development or operational performance in other sectors outlined within the Committee on Climate Change Report 'Net Zero; The UK's contribution to stopping global warming', including aviation, shipping, waste, fluorinated gases, agriculture and other land-use, transport, buildings, industry and power. One comment suggested that this section should be restructured to reflect the UKGBC Net Zero Carbon Framework too. • Process: Several comments suggested that BCC should encourage a Citizens Assembly to assist in demonstrating accountability and responding to the Climate Emergency and achieving the zero-carbon target by 2030. • Insufficient reference to the Climate Change Emergency: Several comments considered that there was insufficient reference to the climate emergency declared in Bristol, whilst other comments considered that there was insufficient reference to the IPCC report from October 2018. Comment considered that references to these documents and the target should be featured throughout the Plan. • Specific clean energy city and zero carbon: One comment considered that the Plan needed a separate energy section, setting out the vision for how the City's energy generation, storage and distribution will be met. • Integral part of good development: One comment suggested that PassiveHaus 	<p>122, 123, 165, 372, 437, 441, 487, 491, 588, 596, 610, 612, 614, 621, 644, 646, 658, 717, 728, 761, 816, 842, 865, 867, 879, 893, 896, 904, 964</p>

Key Themes	Respondent References
<p>principle should be integrated fully into all policies, as well as being offered as an alternative. A further comment considered that policies needed to set out the clear linkages between requiring high-levels of energy efficiency and on-site renewable energy in terms of reducing on-going heating and energy costs for residents and reducing fuel poverty. Suggested that an additional policy on 'Safeguarding Renewable Energy' would be sufficient.</p> <ul style="list-style-type: none"> • Viability: Several comments considered that BCC must ensure that the policy requirements including financial contributions are viable requests, noting that the Plan is not supported by either an Infrastructure Delivery Plan or any form of cost analysis for the policies proposed. The requests within this policy should be tested against other policy requirements. Conversely, a separate comment considered that the delayed cost of retrofitting homes which do not choose to comply with the policy should be considered as an alternative scenario in viability-testing. <p><i>Comments in objection (4)</i></p> <ul style="list-style-type: none"> • Several comments strongly objected to the policies within this section as these did not go far enough in meeting the BCC commitment to be carbon neutral by 2030. Several respondents considered that the Plan should consider all categories outlined in the Committee on Climate Change (mentioned above), and that the policies should be guided by a Citizens Assembly informed by experts. These references to the climate emergency should filter through all policies, rather than have one section dedicated to climate change. • Monitoring: Two comments considered that the Plan documents need to include an audit of the predicted carbon emissions over the lifetime of the plan (including the impact of new development and baseline emissions). This would enable Local Authorities to monitor these and demonstrate how the policies will achieve carbon emission reductions by the Climate Change Act. • Evidence: One comment considered that the policies within this section are not justified or supported by sufficient evidence. Specifically: <ul style="list-style-type: none"> ○ There are no specific evidence base documents to demonstrate the technical or financial implications of introducing additional technical requirements; ○ The targets within the policies are contrary to the PPG which states that the maximum carbon reduction targets that can be imposed through a local plan is a 19% improvement over Part L 2013 of the Building Regulations which is equivalent to the (now withdrawn) Code for Sustainable Homes level 4 energy efficiency standard. 	

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 90 Comments from statutory bodies and partnerships

Consultee	Respondent Reference
South Gloucestershire: Broad support for the approach presented in Section 13, however consider defining 'zero carbon' at the beginning of the Section to aid clarity, including whether this includes unregulated and regulated carbon emissions.	610
Environment Agency: Consider that there is little mention of flood risk within this section, except for a very short section at the end. An increased risk of flooding is one of the major impacts of climate change and this is a key factor when designing buildings to be more resilient and sustainable. EA advise that the 2008 Planning Act requires Local Planning Authority to ensure planning policy contributes to the mitigation of, and adaptation to climate change. The revised NPPF is the key link between planning policy and the Climate Change Act 2008. Paragraph 20 reinforces the need for strategic policies to address climate change mitigation and adaptation. This is further supported by paragraphs 148 and 149, which highlight the need for plans to take a proactive approach.	964

62. CCS1: Climate change, sustainable design and construction

Overview: In total, 51 respondents made 76 comments regarding policy CCS1 Climate change, sustainable design and construction. Key themes are identified in the table below.

Table 91 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General</p> <p><i>Comments in support (10):</i> Several comments were broadly in support, subject to a number of revisions and the requirements being enforceable on developments. One comment particularly valued references to meaningful and challenging, but achievable targets set on sustainability.</p> <p><i>Comments neither in support nor objection (17):</i> Reiterating the comments made against Section as a whole, several comments considered that the policy did not go far enough, stating reference should be made to the following:</p> <ul style="list-style-type: none"> • There should be a greater link between climate change and social justice, setting a clearer pathway for protecting poorer or marginalised communities from the impacts of climate change; • Passive ventilation, cooling and solar design is not sufficiently radical if zero carbon design is to be achieved. • The impact of operational development, bearing in mind that 10% of the UK's CO2 emissions are directly attributable to construction, and that around 80% of emissions associated with the built environment are from buildings in use. • 'Targets' and 'legal commitments' and the need to respond to the Climate Emergency declared in Bristol and the IPCC report from 2018. • Reference should be made to 'retrofitting' existing buildings where possible, particularly if buildings / housing is being retained. <p>Other comments considered:</p> <ul style="list-style-type: none"> • Lack of clarity over the definition of 'zero carbon' could create space for developers to generate their own interpretation of what this means. Two comments suggested that this needed to be strengthened to ensure that there was no need to retrofit mitigation or adaptation measures later down the line. • Passive ventilation and passive cooling: Several comments considered that the wording of the policy did not support a move towards zero carbon, and should be upgraded to include reference to 'high levels of gap free thermal insulation, thermal bridge free and airtight design and construction, heat recovery ventilation, triple glazed windows and insulated doors; combined with careful design of glazing to avoid over-heating and passive and night cooling where needed'. • Case Studies: One respondent called for case studies to be included within the policy to enable sight of what would be deemed to be unacceptable and what types of mitigation would be welcomed. • Application through the development management process: Several comments reflected a recent application for a fossil fuel power generator which was considered to be contrary to reducing CO2 emissions. • Role of CCS1: Whilst broadly in support, four comments considered that this policy did not function on its own. The policy seemed to summarise the 	<p>122, 165, 409, 418, 420, 437, 583, 588, 596, 605, 610, 614, 617, 627, 663, 712, 807, 816, 818, 827, 829, 842, 844, 851, 856, 857, 867, 870, 888, 893, 904</p>

Key Themes	Respondent References
<p>requirements of climate change and the sustainability draft policies in CCS2-5.</p> <p><i>Comments in objection (4):</i> These included:</p> <ul style="list-style-type: none"> One comment in objection stated that the lack of definition of 'zero carbon' could enable developers to set their own interpretation of this. Three comments in objection strongly opposed policies on sustainability due to implications for development viability, harmful impact on building quality and the potential to divert financial contributions away from community-beneficial uses. One comment suggest that these policies would need sufficient viability testing. One comment considered that the Climate Change and Sustainability Practice Note will need to be updated as a matter of urgency. Consider that Sustainability statements should be proportionate to the scale of development. 	
<p>Mitigating climate change</p> <p><i>Comments in support (3):</i> Those is support requested that the policy went further, referencing achieving zero carbon in both regulated and unregulated emissions and the commitment to meeting the targets.</p> <p><i>Comments neither in support nor objection (4):</i> Several comments reiterated points made against the general tone of the policy, suggesting that the need to mitigate the impacts of climate change is linked to recently declared Climate Emergency. Several comments suggested that the mitigation measures should go further, making reference to the need to also mitigate urban heat island effects and to flood amelioration. Other comments included:</p> <ul style="list-style-type: none"> One comment required greater reference to the environmental benefits of urban trees to be considered One comment considered that reference to passive ventilation and passive solar design is harmful in achieving very low or zero carbon buildings, however the passive cooling reference should remain. One comment considered that connecting to Bristol's heat network should be referenced within the policy. 	<p>4, 118, 165, 621, 627, 949, 950</p>
<p>Requirement for Sustainability Statement</p> <p><i>Comments neither in support nor objection (3):</i> Three comments considered that Sustainability Statements should be proportionate to the scale of development proposed, and these should use the Climate Change and Sustainability Practice Note (2012 or latest version).</p>	<p>487, 605, 614</p>
<p>Sustainable design standards</p> <p><i>Comments in support (2):</i> One comment supported the addition of Passivhaus as an alternative to BREEAM for new developments. A second comment supported BREEAM requirements, including for BREEAM Communities assessment for residential schemes.</p> <p><i>Comment neither in support nor objection (23):</i> There were several comments in relation to the implementation of these standards:</p> <ul style="list-style-type: none"> Strengthening of the policy: Two comments suggested amendment that BREEAM Communities 'Excellent' rating should not be 'sought', it should be 	<p>48, 111, 165, 316, 420, 487, 504, 605, 672, 717, 751, 793, 812, 816, 818, 819, 845, 851, 857, 865, 866, 867, 879, 888, 891, 893, 894, 896, 964</p>

Key Themes	Respondent References
<p>'required' or 'expected'. Several comments considered that to respond to the climate emergency, housing developments of all sizes should be required to meet a sustainable design standard.</p> <ul style="list-style-type: none"> • Process: One comment suggested that mitigation measures should be listed in order of priority, with energy efficiency needing to be maximised before seeking low carbon heat and power supplied. • Alternative Standards: One comment suggested that AECB CarbonLite and AECB Building Standard has not been reference, and it is not clear how these standards can be used instead as a means to achieving compliance. Several comments considered that Home Quality Mark and LEED standards should also be incorporated as suitable alternatives. • 200 dwelling requirements for BREEAM: Two comments considered that the policy could be more ambitious e.g. a BREEAM certificate could be required for developments over 100 units. In the same regard, one comment considered that this was a watering down of standards in BCS15 which used to be applicable to 10 or more units. A further comment considered that the threshold should instead be based on the size of development, not the number of dwellings. However, several comments on the contrary considered that BREEAM does not stipulate the scale of development that it is intended to appraise – these comments considered that the minimum threshold should be significantly increased and that allocated sites are exempted. • Onerous requirement: One comment considered that the requirements of BREEAM for Communities are already typically covered within the Environmental Statement, Design and Access Statement and Statement of Community Involvement, and therefore this is duplicating existing requirements. A second comment considered that BREEAM Communities is only applicable to masterplan scale developments. One other comment considered that it is inappropriate for the Council to be seeking a BREEAM Communities "Excellent" rating, as this is not in accordance with NPPF (2019, Para 127(f) and Para 150(b)) or the Planning Practice Guidance (ID 56-013 to 56-017). • Passive ventilation and passive cooling: Several comments considered that the wording of the policy did not support a move towards zero carbon, and should be upgraded to include reference to 'high levels of gap free thermal insulation, thermal bridge free and airtight design and construction, heat recovery ventilation, triple glazed windows and insulated doors; combined with careful design of glazing to avoid over-heating and passive and night cooling where needed'. • Circular Economy: One comment considered that the policy should go further in increasing the emphasis on circular economy, local resource procurement and measuring local economic contribution in the procurement of construction materials. • Clear articulation of consequences: One comment considered that if net zero emissions are not achieved for new buildings (regulated, unregulated or embodied) there will need be negative (greater than 100%) cuts to emissions in other sectors and new homes will need to be retrofitted within the first 25 years of their life (which is expensive and disruptive) and off-sets will need to be sought outside the Bristol boundary. • Standards applied to re-use of existing buildings: One comment questioned 	

Key Themes	Respondent References
<p>how these standards could be applied to the re-use of existing buildings.</p> <ul style="list-style-type: none"> Further requirements Request clarification to text that states design should be sufficiently flexible and adaptable to changes of use of layout to enable future refurbishment Request for an SPD: One respondent considered, and SPD would be necessary to consider these requirements in greater detail. <p>Comments in objection (4): Comments in objection were predominantly related to lack of evidence and viability testing,</p> <ul style="list-style-type: none"> Lack of evidence and viability testing: Several comments considered that there is no evidence base or consideration of how the proposed standards and requirements will impact on overall viability. These comments stated that this policy should be removed, or at the least the minimum threshold should be significantly increased and that allocated sites are exempted. One comment explicitly considered that this needed to be tested as part of the Local Plan viability assessment. One comment called for greater flexibility in relation to site specific viability issues (particularly for sites which required significant remediation). Several comments suggested that the policy wording should be amended to state 'where feasible and viable' across all elements of the policy. 	
<p>Water efficiency</p> <p><i>Comments neither in support nor objection (4):</i> Three comments considered that if BCC wishes to adopt the higher optional standard for water efficiency of 110 litres per person per day, then this should be justified against the requirements of the PPG and should be evidenced through a Water Cycle Study. This response considered that if that City is not within an area of water stress then this requirement should be removed.</p> <p>One comment requested clarification be provided on whether calculations would need to accompany the planning application. One comment considered that targets should be implemented to reduce the use of potable water across all development. One comment suggested that the target should actually be 105 litres per person per day.</p> <p><i>Comments in objection (2):</i> Two comments considered that this policy had not been viability-tested and placed an undue requirement on development. The cumulative impact of this policy and other policies on plan-viability needed to be evidenced, given the significant implications these could place on development. If BCC wish to adopt a higher optional standard for water efficiency this would need to demonstrated compliance with NPPF (ID 56-013 to 56-017). The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas.</p>	672, 812, 819, 845, 857, 866

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 92 Comments from statutory bodies and partnerships

Consultee	Reference
South Gloucestershire Council: Support for the overall principle of the policy and the required sustainable design standards to be achieved. Consider that the	610

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

Consultee	Reference
policy should be strengthened, replacing 'should' with 'will be required to'.	
Environment Agency: Consider that this policy should state that buildings in current and future Flood Zone 3 should be designed to be resilient to flooding.	964

63. CCS2 Towards zero carbon development

Overview: In total, 77 respondents made 210 comments regarding policy CCS2 Towards zero carbon development. Key themes are identified in the table below.

Table 93 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General</p> <p><i>Comments in Support (9):</i> These comments generally supported the strength of proposed requirements on new developments in terms of climate change mitigation/adaptation. Several comments in support suggested that heat and cooling demand should be through sustainable, non-fossil fuel and non-combustion means. One further comment considered that the policy established meaningful, but achievable targets on sustainability.</p> <p><i>Comments neither in support nor objection (40):</i> These broadly included:</p> <ul style="list-style-type: none"> • Strengthened policy: Several comments stated concern that there is only one reference to becoming carbon neutral within the plan by 2050, but there are earlier targets imposed in Bristol from 2030 which the policy should reference. As summarised against Section 13 overview, several considered the policy should be shaped by the Climate Change Emergency and embedded within a plan that is led by an ambition to address climate change, citing Copenhagen as a suitable case study. Other documents referenced included: IPPC 1.5-degree report, Committee on Climate Change, Paris Climate Accord, Parliament's climate decision, the Climate Emergency Declaration). One comment considered that the policy should align with the Committee on Climate Change's recommendations for 2025 which would deliver ultra-high levels of energy efficiency as soon as possible and by 2025 at the latest, consistent with a space heat demand of 15-20 kWh/m²/yr. • Enforcing the policies: There were several challenges to the overall achievability of carbon targets, with a number considering that carbon offsetting should be seen as a last resort. One comment suggested that if the development is at odds with CCS policies and other policies, then climate change requirements should take priority. One comment challenged the enforceability of these policies when under pressure to meet a housing target, suggesting that these should be a legal requirement. Several comments suggested that the policy should use the terminology of 'developers / developments must'. • Definition of zero carbon and calculation of unregulated emissions: Several comments stated that a clear definition of zero carbon is needed in the policy or supporting wording, with clarification over references to 'regulated and unregulated' energy, including how these will be calculated. One comment stated that there is a need to consider the performance gap and seasonality effect when defining zero carbon buildings. Concern that if these two aspects are not accounted for then the annual demand will exceed the energy supply. One comment considered that no development has a net positive gain, particularly when developing green spaces. • Measuring zero carbon: One comment considered that there is a practical problem in measuring compliance with a zero-carbon emissions target. One comment considered that the measurements should consider 'whole life' 	<p>4, 100, 103, 116, 165, 244, 410, 415, 420, 487, 490, 583, 588, 596, 605, 610, 614, 615, 617, 621, 627, 637, 647, 648, 658, 663, 664, 672, 709, 712, 717, 728, 761, 799, 811, 815, 816, 818, 819, 827, 829, 842, 845, 856, 857, 863, 865, 866, 867, 877, 880, 885, 888, 893, 894, 904, 949, 950, 968</p>

Key Themes	Respondent References
<p>carbon impacts for new development. One further comment suggested that to measure any reduction in carbon emissions, there was a need to understand the baseline.</p> <ul style="list-style-type: none"> • Defining sustainability: Several comments suggested the term sustainability is used in its widest sense, to incorporate economic and social sustainability as well as environmental. • Re-titling the policy: Two comments considered the policy should be titled 'net zero carbon development', whilst a second comment that 'Towards' should be removed. One comment suggested that the energy and carbon reduction strategy should be separated out from other sustainability headings. • 'As-built' requirements: Two comments suggested that there is often a performance gap between 'as-designed' and 'as-built' energy performance. Without as-built requirements, buildings are unlikely to have zero carbon in operation. One comment considered that a new performance bond should be created and returned once the standard is designed-in and verified as built. • Existing Buildings and Change of Use: Several comments suggested that there should be explicit reference to change of use and existing buildings. A separate guidance document should be produced with existing buildings in mind, and these should be treated separately within the policy. • Incorporation of Local Energy Planning: One comment stated that local area Energy Planning provides many potential benefits, including a clear pathway to meeting ambitious national decarbonisation objectives. • Inappropriate setting of policy requirements: Several comments considered that BCC's emerging policy approach deviates from the decision by central government to set standards for energy efficiency through Building Regulations. Any local requirement for sustainability of buildings should consistently reflect the Government's policy for national technical standards. • 'Fabric first' approach: Several comments considered that the reduction of energy consumption should focus on a fabric-first specification. • Expanding the requirements for energy use in new development: One comment suggested that this should be expanded to beyond energy uses (such as fluorinated gases). Stated that text should be amended to include auxiliary energy use. • Energy Supply: One comment considered that the Local Plan Review should identify site-based opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems. • Vision for energy generation: One comment suggested that the Local Plan Review needs an energy section which sets out a vision for the city's energy generation, storage and distribution and how the needs of the growing city population will be met. Two comments considered that policy should discourage applications for noisy, fossil-fuel generators in areas of Central Bristol. • Viability: Several comments expressed concern that this policy would place an onerous burden on developers and should be tested as part of the Local Plan Review viability assessment. Several other commenters considered that the policy would make a limited impact on addressing climate change or improving energy efficiency, but it would have significant negative effect on the ability for development to contribute to other policy requirements (such 	

Key Themes	Respondent References
<p>as affordable housing provision and other infrastructure). Site-specific flexibility was requested.</p> <ul style="list-style-type: none"> • Process: Several responses considered that progress towards zero carbon in the city should be guided by a Citizens' Assembly and informed by experts. • Additional guidance: Several comments requested an Energy Statement Guidance and Sustainable Construction Checklist, possibly within the form of an SPD. • Prescriptive technologies: One comment considered that the prescription of technologies and targets may prevent the lowest-carbon option and a 100% reduction in residual carbon emissions may cause unintended consequences. Several comments provided proposed policy wording, including an expectation that development will: minimise the demand for heating, cooling, hot water, lighting and power through energy efficiency measures; meet its remaining heat/cooling demand through sustainable, non-fossil fuel and non-combustion means; maximise on-site renewable energy generation; and, meet any outstanding reduction in residual emissions through carbon offsetting. • Specific Uses / Locations: <ul style="list-style-type: none"> ○ Two comments were unclear how this policy would work for specific uses (such as data centres), which require a consistent secure supply of electricity, and for which heat rejection is critical to operation. ○ One comment requested that large estates should be treated as one site, for which carbon targets should be applied across all sites. This is because some buildings may be particularly specialist and not be able to achieve the targets as a single unit. ○ One comment considered that Community-Led Housing should be promoted as an opportunity to achieve net zero-carbon development. ○ A separate comment considered that the air pollution impacts of CHP and wood-burning stoves should be highlighted, favouring biomass over these methods. ○ Several comments indicated that there were limited opportunities to connect to low carbon energy networks in areas where these are not currently planned (i.e. Ashton Gate / Ashton Vale or Lockleaze). <p><i>Comments in Objection (10):</i></p> <ul style="list-style-type: none"> • Several comments in objection considered that there was insufficient technical information / evidence submitted to support the policy. Several comments remained concerned that the proposed policy and carbon offsetting approach may place an onerous burden on developers and where scheme viability is challenged, this will need to be balanced against other policy requirements within the Local Plan Review. • One comment considered that to set targets which were more onerous than Building Regulations was out within the requirements of the Planning Practice Guidance (PPG). • Several comments considered that the policy was contrary to the Government's intentions to set standards for energy efficiency through Building Regulations. • One comment objected to the draft policy following a review of the evidence base, including the Cost of Carbon Reduction in New Buildings report (Currie 	

Key Themes	Respondent References
<p>and Brown, 2018).</p> <ul style="list-style-type: none"> One comment considered that the policy did not go far enough in 'designing out' fuel poverty and suggested that it is important that this policy apply to all new development. One comment considered that the policy would be broadly unviable as sites would have already been acquired based on any existing policy of 20% reduction in CO2 emissions. One comment explicitly related to the unregulated emissions are not in the control of the developer and are often reliant on the occupant use of the building. It was considered to be unreasonable to expect new development to achieve this. 	
<p>10% CO2 reduction requirement</p> <p><i>Comments in support (3):</i> There were three comments that supported a 10% reduction target. One of those comments in support noted that from experience of the London Plan, the 35% target is very challenging for developments that do not have a high heat demand or a large area of available roof space for solar PV.</p> <p><i>Comments neither in support nor objection (18):</i> These included:</p> <ul style="list-style-type: none"> More ambitious target: Several comments suggested that the target should be strengthened to 19% or 30%, with one comment stated that this would not significantly increase development costs for residential or non-domestics units (citing ULGBS Driving Sustainability in New Homes, for evidence). One comment suggested that the target should be higher so that it is commensurate to Passivhaus standards. Greater clarity around definition of 'reduction': One further comment suggested that to measure any reduction in carbon emissions, there was a need to understand the baseline. One comment suggested that this should be below the current Part L Target Emissions Ratio (TER). Longevity of the policy: One comment stated that reduction targets are based on the 2013 Part L Baseline, which could be updated. Energy efficient measures: One comment considered that 'energy efficient measures' needed additional clarification, with one comment suggesting this should be through sustainable, non-fossil fuels and non-combustion means. One comment questioned whether connection to a heat network would count as energy efficient measures, and as such, count towards the 10% target. Proportion of energy efficient measures and renewables: One comment considered that it is not clear whether a 45% reduction in emissions could be achieved through energy efficiency measures. With Feed-in Tariffs no longer available, one comment considered that on-site renewables are not good value for money and have a questionable reduction in carbon emissions across their lifetime. Calculation of unregulated emissions: Several comments considered that the calculation methodology for unregulated emissions should be followed. Enforceability: One comment considered that BCC must be stringent on meeting the 10% reduction and reject any application that doesn't achieve this. <p><i>Comments in objection (6):</i> Several comments objected to minimum 10%</p>	<p>4, 48, 64, 165, 420, 487, 524, 605, 610, 615, 621, 626, 647, 648, 656, 657, 658, 671, 728, 812, 857, 863, 870, 888, 896, 949, 950</p>

Key Themes	Respondent References
<p>reduction in regulated CO2 emissions through energy efficiency, on the basis that no evidence is provided to the viability, deliverability, feasibility or achievability of these targets, or a 100% reduction in carbon.</p> <p>Additional comments considered that the policy placed an onerous burden on developers and would need to be balanced against other policy requirements in the Local Plan Review and CIL contributions. From these comments, several considered that the viability assessment would need to include the lifetime management and maintenance costs of implementing the policy, alongside whether this policy is implementable for all scales of development.</p> <p>One comment considered that the policy was currently unsound as it conflicts with paragraph 150 of the NPPF requirement to reflect national technical standards, alongside the Government intention to establish energy efficient standards through building regulations.</p>	
<p>35% CO2 reduction requirement</p> <p><i>Comments in support (2):</i> There were two comments that supported a 35% reduction target. One of those comments in support noted that experience of the London Plan, the 35% target is very challenging for developments that do not have a high heat demand or a large area of available roof space for solar PV.</p> <p><i>Comments neither in support nor objection (14):</i> These comments include:</p> <ul style="list-style-type: none"> • Unregulated energy: Several comments considered that the definition should be expanded to account for unregulated energy, the seasonality / diurnality of renewable energy and how storage is necessary to achieve net zero carbon. • Quantification of off-site provision: One comment considered that the quantification of off-site provision has not been defined – is there an opportunity that all residual requirements to be delivered through carbon offset payments? Comment request that there should be inclusion of a requirement for at least 50% of the residual emissions be offset using off-site renewable energy. • Greater clarity around definition of ‘reduction’: One comment suggested that this should be below the current Part L Target Emissions Ratio (TER). • Exceeding requirements: One comment questioned why there was no reference to exceeding the minimum on-site requirement, as the Currie and Brown report states that this may be no more expensive than purchasing allowable solutions. • Longevity of the Policy: One comment stated that reduction targets are based on the 2013 Part L Baseline, which could be updated. • Calculation of unregulated emissions: Several comments considered that the calculation methodology for unregulated emissions should be followed. • Reference to heat networks: One comment questioned whether connection to a heat network would count as energy efficient measures, and as such, count towards the 10% target. <p><i>Comments in Objection (5):</i></p> <ul style="list-style-type: none"> • Graded requirements based on Housing Type: Variations were considered necessary as a means to abating carbon on-site. 	<p>4, 122, 487, 524, 605, 614, 621, 626, 656, 657, 658, 671, 856, 857, 863, 867, 870, 888, 896, 949, 950</p>

Key Themes	Respondent References
<ul style="list-style-type: none"> ○ Several comments requested that the 35% reduction in regulated emissions should be overwritten with the 100% reduction in regulated and unregulated CO2 emissions for buildings of 4 storeys or less; and, where 100% is not possible, a communal energy system purchasing 100% guaranteed renewable energy, as an acceptable method for achieving zero carbon. ○ Several comments considered that the 35% reduction should be increased to 50% for houses. ○ One comment considered that the policy should be revised based on housing type and achieving a minimum 50% reduction in regulated CO2 emissions, as evidenced by the Currie and Brown report. A different approach to medium and high-rise flats was considered necessary. • Onerous beyond national requirements: One comment considered that the policy was currently unsound as it conflicts with paragraph 150 of the NPPF requirement to reflect national technical standards, alongside the Government intention to establish energy efficient standards through building regulations. • Viability: Several comments considered that there is insufficient technical information to support the policy wording, nor viability-testing of options. Several comments suggested that this policy was too onerous, should be tested as part of the viability assessment for the Local Plan Review, and assessment against the other requirements within the Plan. Several comments questioned whether this could be realistically delivered across all development. 	
<p>100% reduction through carbon offset</p> <p><i>Comments in support (1):</i> There was one comment generally in support of the policy, however greater clarity was deemed necessary for the 'unregulated energy' covered by the policy.</p> <p><i>Comments neither in support nor objection (7):</i> These included:</p> <ul style="list-style-type: none"> • Enforceability: One comment considered that this policy should be strictly enforced, with PassivHaus being the backstop position if it cannot be met for other reasons. • Viability: Several comments considered that there was no evidence of viability, feasibility or achievability of this policy. One comment considered that viability testing of all scales of development was necessary. • Carbon offsetting and unregulated energy: One comment considered that there was insufficient detail for how 'unregulated energy' should be covered by the policy. One comment considered that there should be a 100% reduction in regulated and unregulated CO2 emissions, for buildings of 4 stories or less – where 100% on-site reduction is not possible, a communal energy system purchasing 100% guaranteed renewable energy should be considered to be one acceptable method. <p><i>Comments in objection (4):</i></p> <ul style="list-style-type: none"> • Onerous beyond national requirements: One comment considered that the policy was currently unsound as it conflicts with paragraph 150 of the NPPF requirement to reflect national technical standards, alongside the Government intention to establish energy efficient standards through 	<p>165, 799, 815, 816, 818, 827, 863, 867, 870, 888, 893, 968</p>

Key Themes	Respondent References
<p>building regulations.</p> <ul style="list-style-type: none"> Viability: Several comments strongly objected on the basis that there was no evidence of viability, feasibility or achievability of this policy. 	
<p>Requirement for energy strategy</p> <p><i>Comments neither in support nor objection (9):</i> These included:</p> <ul style="list-style-type: none"> Several comments considered that additional text was necessary which stated that 'energy strategies will be required to use national grid carbon factors over the lifetime of energy systems to align with Government projections of grid decarbonisation'. The policy should be explicit about using SAP10 grid carbon factors and require developers to use projected grid carbon factors over the lifetime of the relevant energy systems. Several other comments considered that 'current fuel carbon intensity factors should be used'. Two comments requested additional guidance for how the heat networks' forward projections of emissions intensity should be taken into account within the Energy Strategy. The policy should provide flexibility on energy performance targets when connecting to the District Heat Network. Three comments considered that new development should demonstrate compliance with an Energy Strategy as part of its Sustainability Statement. Within the Energy Strategy, predicted unregulated energy should be reported at the planning application stage and use the CIBSE TM54 methodology. This should then be monitored every 5 years and laid out in the form of Appendix B of the UKGBC Net Zero Carbon Framework, and include the publication of actual in-use energy and fuel data in the form of meter readings. Three comments considered that where existing buildings are being refurbished or converted into new uses, and it is not feasible for the full CO2 emissions reduction to be met, the Energy Strategy should show that energy demand has been reduced to the lowest practical level using energy efficiency measures. One comment also considered that developers must demonstrate as-built performance of all buildings and retrospectively pay for additional carbon offsets where they fail to meet zero carbon. One comment considered that the current version of Building Regulations Part L should be used for targets removing the need for new guidance. <p><i>Comments in objection (2)</i></p> <ul style="list-style-type: none"> One comment in objection considered that new development should only be expected to demonstrate feasible energy efficiency measures, and on-site renewable energy generation measures that have been implemented, before the use of carbon-offsetting has been considered. A second comment in objection considered that all above prescribed measures should be removed, and that compliance with equivalent Code for Sustainable Homes L4 or non-residential expectation for BREEAM excellent rating, should be inserted within a Sustainability Statement 	<p>4, 48, 487, 605, 614, 728, 856, 867, 888, 949, 950</p>
<p>Carbon offsetting - financial contributions</p> <p><i>Comments neither in support nor objection (19):</i> These included references to the following:</p> <ul style="list-style-type: none"> Longevity of the Policy: Two comments requested that the financial contributions rate should be regularly reviewed and updated to reflect opportunities utilising on-site carbon reduction measures. 	<p>4, 165, 420, 605, 614, 621, 658, 728, 799, 815, 816, 818, 827, 845, 851, 856, 857, 863,</p>

Key Themes	Respondent References
<ul style="list-style-type: none"> • Demonstrating as-built performance: Two comments requested that developers must demonstrate as-built performance (actual and projected grid carbon factors) of buildings and pay for additional carbon off-sets where these are not zero carbon. One comment considered that post-occupancy analysis is needed to see how buildings are performing during occupation. • Other mechanisms for carbon offsets: One comment considered that local afforestation should be considered as a method of carbon-offsetting as one or more reliable means of achieving negative emissions. • Process for compliance: Two comments considered that the process for complying with the financial contribution clause is too vague. One comment referenced that this was done via a 'Community Energy Fund' in some London Boroughs; a process which should be replicated within Bristol. One comment raised that carbon offset schemes are notoriously difficult to police and often do not result in the expected levels of reductions. Request for the inclusion of a requirement that at least 50% of the residual emissions be offset using off-site renewable energy. A second comment requested that this requirement be staged or phased. • Strengthened policy: One comment considered that the targets set out to achieve carbon neutrality are not stringent enough and rely too heavily on carbon off-sets. One comment considered that the contributions should be graded: i.e. increased up to £120 per tonne up to the 35% CCS2 target, to discourage developers taking an easy route to compliance, with the fee reduced to £60 per tonne (to match the London Plan) from 35% to zero carbon. • Application to all types of development: One comment considered that offset payments should apply to all developments include self-builders and community-led housing. • Fund: Several comments requested confirmation of what the carbon off-set levy will be put towards, as there is currently no guarantee that the payment would result in certified carbon reduction projects. There is no clarity of what would constitute an acceptable allowable solution. One comment considered that strict parameters should be applied to the use of the fund i.e. returning the investment if it is not spent within a 12-month window, and provision of a full list of allowable solutions identified by BCC which demonstrate the cost per tonne of carbon saved. • Evidence: To retain this policy, several comments considered that a full evidence base must be generated to assess the commercial and technical viability of the policy. Should it be considered viable then greater detail should be provided to explain. • Refurbishments and existing buildings: One comment requested clarity as to whether carbon-offsetting applies in cases where refurbishments are required. • Incentivising higher standards: One comment stated that the Council should explore how it could incentivise developers who wish to embrace higher standards by offering a type of fiscal incentive or favourable approach, instead. <p><i>Comments in objection (9):</i></p> <ul style="list-style-type: none"> • Onerous requirement on developers: One comment considered that the 	<p>865, 867, 876, 888, 891, 893, 896, 949, 950, 968</p>

Key Themes	Respondent References
<p>policy places onerous financial burdens on developers because grid electricity and gas are widely expected to decarbonise over the next 30 years. If the carbon offset figure payment is based on carbon factors at the time of development, this will greatly exaggerate total emissions and the payment. In addition, market based certified carbon offset schemes are likely to be cheaper than the rate proposed in the policy – this should be offered as an alternative.</p> <ul style="list-style-type: none"> • Regulated only: One comment considered that unregulated emissions will largely be the responsibility of future tenants for which a landlord has little control, yet will be responsible for their carbon offset - this conflicts with principle of 'polluter pays'. Carbon offsetting should be regulated emissions only. One comment considered that the design and specification of the building does not affect the calculated unregulated energy consumption so any energy efficiency measures for unregulated energy are not taken into account. • Using contributions: Several comments considered that there is no information for how BCC propose to use financial contributions as a means of offsetting. This needs to be detailed within the policy. • Justifying carbon contributions and viability: Several comments considered that there was no justification provided for how the contribution of £95 p/tonne CO₂ has been arrived at. Considered that this policy was taken from the London Plan; a figure that was viability tested in London-specific circumstances, but which is unlikely to be viable in Bristol. One comment considered that this was not in accordance with national policy and guidance, whilst several others requested that this rate be regularly reviewed and updated to reflect opportunities to use onsite carbon reduction measures. • Unclear definition of 'directly-linked': Comment that it is unclear what is meant by 'directly linked' i.e. is this geographically separate, but financially linked? One comment questioned how it would be possible to ensure that such direct provision of carbon savings by a developer was clearly additional to what would have happened anyway. This will require clear auditing of carbon savings. • Principle of offsetting: Two comments suggested that offsetting simply sends the problem elsewhere and should be rejected for hierarchy of measures to deal with non-compliant development (i.e. the UK Green Building Council Net Zero Hierarchy). One comment suggested that this should only be permitted in local-circumstances (i.e. collected to support the Bristol Community Energy grant funds) or in exceptional circumstances as a last resort. • Unviable: One comment considered that if this policy is applied to development anywhere, the scale of costs would result in an unviable scheme. • Not in accordance with national guidance: One comment considered that carbon offsetting does not align with national guidance. 	
<p>PassivHaus <i>Comments in support (8):</i> The majority of comments strongly supported the policy which encourages PassivHaus, on the basis that this offers an opportunity to significantly reduce the scale of CO₂ emissions.</p> <p>One comment suggested that the policy could offer the PassivHaus refurbishment</p>	<p>64, 83, 122, 123, 165, 487, 615, 621, 637, 658, 717, 857, 888</p>

Key Themes	Respondent References
<p>standard (EnerPHit) as an alternative compliance route. One comment considered that alternative options could include: Well V2 and WELL Community standard, as well as the ILFI Living Building Challenge and Living Community Challenge.</p> <p>Several other comments considered that compliance with PassivHaus certification should be the preferred route, including a requirement for 100% off-set of regulated energy needs to be strictly enforced with Certified PassivHaus being the backstop position. However, one comment considered that two further issues need to be included within the policy, including peak demand and space for renewable energy generation.</p> <p>A further comment in support considered that a shift towards a Passivhaus economy will bring with it many opportunities to train many people in new skills.</p> <p><i>Comments neither in support nor objection (3):</i> One comment considered that the policy text should be amended to include reference to heat recovery ventilation with passive night-time cooling rather than passive ventilation. This comment also suggested that the policy text should also reference to an efficient built form factor, and careful glazing design / orientation considerations to avoid over-heating.</p> <p>One comment suggested that the following text should be included within the policy: 'Passivhaus certification will be sought where reasonably practicable from all new residential developments'. It furthered that the use of PassivHaus certification be applied to refurbished dwellings as well as new build.</p> <p>A final comment considered that PassivHaus certification results in low heating demand; it does not prevent emissions in their entirety (i.e. demand is increased via need for mechanical ventilation and domestic hot water demand). This comment stated concern that a PassivHaus certified dwelling was not required to meet a zero-carbon target due to need to meet City's Carbon Neutral target. Suggested that the policy be amended to ensure that the zero-carbon target is still applied.</p> <p><i>Comment in objection (2)</i></p> <ul style="list-style-type: none"> • One comment stated that demand on the local electricity distribution network is likely to increase significantly over the next two decades. For these reasons, non-renewable electric space heating should be excluded from the approach to heating systems, except where a Passivhaus Certification approach is taken. Direct electric immersion heating may only be employed as a backup to a renewable or low-carbon primary source of hot water heating. Proposals incorporating battery storage will also be encouraged. • In alignment with national guidance, one comment considered that there should be a removal of measures prescribed to reduce energy use. This should include: removal of measures prescribed to reduce energy use; removing development standards for achieving Code for Sustainable Homes L4 or non-residential expectation for BREEAM excellent rating; removing reduction targets or an Energy Strategy; or, removing all carbon offsetting and PassivHaus text. 	

Key Themes	Respondent References
<p>Heating systems</p> <p><i>Comments in support (4):</i> Comments were made in support of the policy on the basis of the proposed alignment with Bristol’s zero carbon target and recent ban on gas boilers in new housing by 2025, and that heating systems reliant on fossil fuels or biomass are not acceptable. Heating systems must be well-designed, use low carbon sources, provide heat at reasonable costs to customers and report transparently. One comment supported the principle of ‘classified heat networks’ as defined in the Local Plan.</p> <p><i>Comments neither in support nor objection (15):</i> These included:</p> <ul style="list-style-type: none"> • Electric demand and low-carbon sources: To reduce peak demand on the grid, one comment considered that non-renewable electric heaters should be excluded from the approach to heating systems, except where a Passivhaus Certification has been awarded. Direct electric immersion heating may only be employed as a back-up to renewable or low-carbon primary sources of hot-water heating. Comment to emphasise that heat networks should come from low carbon sources and that heat losses are minimised. Photographic evidence should form part of the requirement to demonstrate losses. One comment considered that there is a need to emphasise the role of air source heating. • Longevity of the policy: One comment considered that as this is a developing market, the policy should allow for innovation. One comment considered that where demand is low, i.e. PassivHaus, this approach will be counterproductive. • Other: One comment considered that the policy should reflect the ‘global warming potential of refrigerants’. • Communal Heating: One comment considered that the requirement to provide communal heating systems on sites that are not near an existing planned heat network is problematic. Communal heating systems come with additional heat billing administration costs – this could create fuel poverty given the lack of market regulation in this area. • Including targets within the policy: One comment considered that targets should be revised to 2030 within the policy-text. Concern that the current document has no specific targets outlined for overheating. Propose a mandatory checklist on all development or at least this should be applied to major development. As a minimum the glazing percentages of the south, west/east facades should be stated with overheating assessment required if exceeding a threshold. Assessment must be carried out to TM59, future weather data should also be used but not mandatory for compliance. • Sustainability of CHP: Comment that current thinking within the industry is that CHP is not necessarily the most sustainable option. Request that BCC place greater emphasis on demonstrating the most sustainable systems have been selected, rather than necessarily pushing CHP as a first choice. • Strengthening the policy wording: Comment that it would be more effective if new developments could be “required” rather than “expected” to demonstrate how heating and cooling systems have been selected. <p><i>Comments in objection (6):</i> Comments in objection included:</p> <ul style="list-style-type: none"> • Connection to an existing heating network: There was concern that the heat 	<p>4, 165, 420, 487, 605, 614, 615, 621, 691, 717, 728, 816, 818, 845, 856, 857, 865, 867, 876, 888, 891, 893, 896, 949, 950</p>

Key Themes	Respondent References
<p>network has not grown as quickly as anticipated, and that there is limited control from the developer over costs associated with the supply of heat, the choice offered to residents in terms of the in supplier or whether BCC can guarantee the sustainability of energy.</p> <ul style="list-style-type: none"> • Lack of evidence and viability testing: One comment considered that there was no justification as to why the threshold is set at 100 dwellings or 10,000sqm for connection, and that the policy itself had not been viability tested. • Removal of acceptable systems: One comment objected to the removal of acceptable systems, as previously set out within the 2018 consultation draft plan. • Independent heat networks: One comment considered that the only existing heat network in Bristol is owned and controlled by BCC as profit making service, therefore conflict of interest with the policy. One comment stated that developers have no control over costs associated with supply of heat, or offer choice of supplier to residents. BCC does not offer guarantees as to the sustainability of the energy that is being provided as part of the heat networks. Rules out electricity as an energy option, which is unnecessarily obstructive and may be only feasible or viable option for some developments. • Evidence: One comment considered that there is also no justification as to why the threshold is set at 100 dwellings or 10,000 sqm for a connection. Considered approach unsound and unsustainable. 	
<p>Cooling systems <i>Comments neither in support nor objection (11)</i></p> <ul style="list-style-type: none"> • Enforceability: One comment suggested that the policy needs to be backed up by transparent and unambiguous standards, and it needs a robust quality checking procedure. One comment considered that this should only be enforced where building regulations assess that there is an overheating risk. • Methods of Implementation: Several comments considered that ensuring buildings do not overheat is essential to preventing the need for re-building or retrofitting. The role of appropriate glazing, white roofs, consideration of orientation and references to solar shading and night cooling were considered to be fundamental. One comment considered that heat pumps should be referenced in the policy alongside heat losses. One comment stated that the supporting text only refers to 'renewable cooling' – measures for achieving this are very restrictive and are largely dependent on what type of building could be designed or the equipment included within it. • Low Carbon: One comment considered that policy text should emphasise that heat comes from a low carbon source and that heat losses are minimised. • Active Cooling: One comment considered that active cooling of buildings with glazed facades should not be allowed, whereas several others stated that active cooling should be an absolute last resort. • Including targets within the policy text: One comment considered that targets within the policy are amended to 2030 throughout. • Strengthening the policy wording: Comment that it would be more effective if new developments could be "required" rather than "expected" to demonstrate how heating and cooling systems have been selected. • Viability-testing: Several comments indicated that this policy should be amended to state that it is only 'where feasible and viable'. Flexibility is 	<p>64, 165, 216, 487, 605, 621, 717, 845, 856, 865, 867, 888, 896</p>

Key Themes	Respondent References
<p>needed within the policy for employment uses and for speculative developments where compatibility of sustainability requirements and the end-user are not always clear from the outset. One comment considered that where traditional heating mechanisms are the only option that this should be detailed within the Sustainability Statement (not the Energy Strategy).</p> <ul style="list-style-type: none"> Amended policy text: Several comments considered that the text contained the policy should be amended, in relation to when new development will be expected to demonstrate that cooling systems have been designed to: <ul style="list-style-type: none"> Take into consideration future temperature increases through climate change; Minimise excessive solar gain through orientation, built-form, massing, fixed, mobile and seasonal shading and green infrastructure; Minimise excessive solar gain through orientation, built form, massing, fixed, mobile and seasonal shading and green infrastructure; then Maximise passive cooling through natural ventilation, diurnal cooling, placement of thermal mass and green and blue infrastructure; and then Meet residual cooling load renewably and consider opportunities for seasonal cooling/heating. In order to install active heating systems, developers will need to demonstrate that it is not technically possible or commercially viable to avoid overheating via passive measures." <p><i>Comments in objection (2)</i></p> <ul style="list-style-type: none"> Comment that the requirement for the most sustainable heating and cooling systems is also unjustified and its viability and practical implications would also need to be assessed. Several comments objected to the policy on the basis that it should only be implemented 'where feasible and viable'. 	

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 94 Comments from statutory bodies and partnerships

Consultee	Respondent Reference
<p>South Gloucestershire: This approach to zero carbon development is supported by SGC and is consistent with SGC emerging policies and the shared evidence studies prepared jointly by the 4 WoE Unitary Authorities. SGC considered that the policy clarifies that 'zero carbon' means that development is 'expected to achieve a 100% reduction in ... regulated and unregulated emissions'. In order to help meet targets and reduce carbon emissions from new development, it is important that this definition of 'zero carbon' is used and therefore is supported by SGC. SGC suggested that it is made clear that the projected annual energy demands include both Regulated and Unregulated energy use. SGC considered that it would also be helpful to have more detailed technical guidance to assist developers in providing the data required to enable compliance with the policy to be assessed.</p> <p>SGC noted that the policy also sets an energy efficiency target of 10%, this means development is expected to achieve a minimum 10% reduction in regulated CO2</p>	610

Consultee	Respondent Reference
<p>emissions through energy efficiency measures. The evidence reports (Currie & Brown 2019 –Chapter 9) considered a policy option for non-residential development which included a 15% reduction in regulated emissions through energy efficiency measures. SGC suggested the word ‘expected’ is replaced with the word ‘required’ in all instances in the ‘Energy use in new development’ policy wording. SGC suggested that for non-residential development, a 15% reduction in regulated CO2 emissions through energy efficiency measures is expected to be achieved. Finally, SGC suggested that consideration should be given to the use of a higher efficiency target for non-residential development.</p>	
<p>Wessex Water: Wessex Water noted that the policy is stated as applying to all development, however comment that greater flexibility is needed as certain types of waste infrastructure will not be applicable. Wessex Water considered that where development is exempt from Building Regulations, the assessment method which requires calculation and comparison against Building Regulation Part L standards is unworkable.</p>	709

64. CCS3 Adaptation to a changing climate

Overview: In total, 23 respondents made 28 comments regarding policy CCS3 Adaptation to a changing climate. Key themes are identified in the table below.

Table 95 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General</p> <p><i>Comments in support (6):</i> Several respondents were broadly in support for this policy, however requested clarification regarding the definition of what is meant by 'the lifetime of the development' and greater clarification to define which 'climate projections and scenarios should be adopted'. One comment considered that these policies were considered to contain meaningful, but achievable, targets set on sustainability.</p> <p>Several comments were generally made in support, subject to small text-based amendments or comments being addressed (below).</p> <p><i>Comments neither in support nor objection (10):</i></p> <ul style="list-style-type: none"> • Overheating: Several comments requested an overheating assessment, using CIBSE TM52/59 methodology (or future replacement standard) which includes specific targets. A second comment requested that if glazing percentages exceeded 25% south facades or 20% east / west facades, an overheating assessment should be mandatory using currently predicted future summer conditions for at least 2020's and 2050's, and assuming high emissions scenarios. A third comment suggested that for commercial and large residential buildings, glazed facades should be completely prohibited. One comment questioned whether these requirements would apply to all development – i.e. refurbishments. • Climate Scenarios: One comment questioned which climate scenarios should be used i.e. 2020, 2050 etc. A separate comment requested that: site level adaptations be in line with the official UK scenarios for 2050 in relation to heat, water, rainfall, extreme weather events and flood risk. • Publication of results: One comment suggested that this assessment should be published within a publicly-available Energy Statement; transparency was considered to place pressure on developers to demonstrate good results. • Cooling measures: One comment stated that passive measures for ventilation and cooling will be favoured, with one comment requesting additional detail on the definition of 'sustainable cooling'. One comment suggested that development of comfortable external spaces in hot weather, should also incorporate provision for green infrastructure • Vulnerable development: One comment suggested that paragraph 3.34 should be amended to state that where the development is designed for the occupation or use of those who are more vulnerable to the impacts of climate change. <p>One final comment stated that policy should use 'developers or development must' to reflect the seriousness of climate change.</p> <p><i>Comments in Objection (5):</i> Two comments requested that information sought by</p>	<p>122, 165, 420, 487, 610, 614, 621, 646, 658, 712, 717, 816, 818, 856, 857, 865, 867, 888, 893, 894, 964</p>

Key Themes	Respondent References
<p>the Council should be proportionate to the proposal and site-specific constraints. Modelling and assessment work for the whole of a large development should not be required where only a proportion of units are considered to be “affected”.</p> <p>Two comments considered that the requirements of the policy were too prescriptive and too onerous, and do not allow the applicant to identify the most technically and commercially viable options to meet the objectives of the Policy. Both comments stated that requirements for new technical standards should be evidenced. One comment considered that the policy repeats elements of CCS1 and CCS2 and should be deleted.</p>	
<p>Site and building level adaptations</p> <p><i>Comments in support (2):</i> These broadly supported the principles of the approach but considered that future summer conditions for at least 2020’s and 2050’s should be assumed. One comment recommended that technical guidance should follow on these requirements – to ensure that the industry can give their view on the proposed approach.</p> <p><i>Comments neither in support nor objection (4)</i></p> <ul style="list-style-type: none"> • Passive Ventilation: One comment considered that passive ventilation in new highly insulated homes is unlikely to address overheating risk in homes in 2050. Mechanical ventilation should be supported, and any passive strategies are stress-tested against future climate scenarios. One comment considered that the value of large canopy trees should be prioritised within the policy. • Material use: One comment considered that the most important factor is the reduction of concrete and cement usage, which should be measured. • Additional detail: One comment requested “building level adaptations for mitigating risk of overheating include internal layouts, room sizes, ceiling heights and glazing areas informed by orientation and their use; purge ventilation for removal of heat; appropriate levels of exposed thermal mass with night purging where hours and type of occupancy allow this; openable windows; external solar shading, deep window reveals, and internal blinds; thermal insulation coupled with adequate ventilation; service design and selecting cooling systems sustainably”. <p>One comment requested that ‘site-level’ adaptations be extended to a whole estate, given that it may be very challenging to delivery site-specific measures due to the specialist nature of buildings, but an overall reduction in carbon emissions could be achieved at an estate-level.</p>	48, 165, 415, 487, 867, 896

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 96 Comments from statutory bodies and partnerships

Consultee	Reference
South Gloucestershire Council: Support the policy adaptations being incorporated into new developments. Consider the policy wording should replace the word ‘expected’ with ‘required’ in order to strengthen and improve clarity of the policy.	610
Environment Agency: Suggested that this policy should include examples of how to minimise the risk and impact of flooding, such as raising floor levels and using flood resilient measures.	910

65. CCS4: Resource efficient and low impact construction

Overview: In total, 24 respondents made 37 comments regarding policy CCS4 Resource efficient and low impact construction. Key themes are identified in the table below.

Table 97 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General</p> <p><i>Comments in support (3):</i> There was general support for policy as a step forward in becoming more resource efficient and low impact construction, including the whole life carbon assessment accounting for operation emissions.</p> <p><i>Comments neither in support nor objection (14):</i> Several comments state that Local Plan should be more ambitious in its recommendation of mixed development and existing building renovation standards. Other comments included:</p> <ul style="list-style-type: none"> • Construction and Operation: One comment supported the emphasis on zero net operational carbon and introduction of whole life carbon assessment. A second comment considered that embodied emissions need to be considered (and where include within the Bristol proposed 2030 zero carbon target. Several comments requested the inclusion of additional text: "Proposals for super-major development should be accompanied by a whole-life assessment of carbon emissions embodied in the development, including an assessment of the embodied carbon of construction reporting back in the format provided in Appendix A of the UKGBC Net Zero Carbon Framework, and using the RICS Whole Life Carbon assessment methodology." • Reference to Circular Economy: Comments generally sought to encourage businesses to operate within the confines of a circular economy. One comment suggested that there should be a requirement for a Circular Economy Statement for major developments, suggesting that the London Waste and Recycling Board. • Scale of development: Several comments suggested that this policy should apply to all accommodation, not just major development. <p>Three comments requested a proposed addition to include the expectation on developers to minimise embodied emissions of buildings and offset 100% of emissions in line with Policy CCS2. One final comment stated that policy should use 'developers or development must' to reflect the seriousness of climate change.</p> <p><i>Comments in Objection (2):</i> Two comments considered that there is no justification behind the development thresholds cited within the supporting text. There should be a recognition of site-specific circumstances, feasibility and viability.</p>	<p>4, 420, 487, 605, 610, 614, 617, 621, 637, 712, 717, 816, 818, 845, 856, 893, 894, 949, 950</p>
<p>Materials</p> <p><i>Comments neither in support nor objection (12):</i> Comments were made in relation to the materials used in development and the reference to whole-life assessment of materials used as follows:</p> <ul style="list-style-type: none"> • Minimising embodied carbon: A large number of these comments were made in relation to the expectation of developers to minimise embodied emissions of buildings and offset 100% of residual emissions in line with Policy CCS2. Comments were made in relation to the requirement for super-major development to be accompanied by a whole-life assessment of the carbon 	<p>4, 165, 487, 605, 614, 658, 856, 857, 865, 867, 949, 950</p>

Key Themes	Respondent References
<p>emissions embodied within a development and throughout construction, and a requirement to report back in the format of the Appendix A of the UKGBC Net Zero Carbon Framework and the RICS Whole Life Carbon Assessment. One comment considered that at this stage, the policy did not cover enough detail on how a whole-life assessment of materials should be undertaken and the objectives of this assessment.</p> <ul style="list-style-type: none"> • Material use: Several comments suggested that the materials used in development should demonstrate the lowest lifecycle impacts, using and managing resources efficiently. One comment considered that the most important factor is the reduction of concrete and cement usage, which should be measured through the Plan. Several respondents advocated the use of a materials that sequester CO₂, such as timber frame or CLT construction of homes. One comment suggested that the policy should be renamed from 'materials' to 'embodied' carbon' to ensure that all emissions are considered for developments. • Super-major developments and whole-life assessment: Several comments considered that proposals for major development should be accompanied by a life-cycle assessment of the materials used, and that whole-life assessment should be required for all major developments – not just super-majors. One comment suggested that greater clarity was needed in relation to the definition of a super-major, so that there were no loop-holes for developers. • Stronger policy wording: One respondent considered that new development should maximise the recycling and re-use of demolition materials, however the word 'maximise' was not considered to be strong enough. Instead, the policy should include legally-binding phased numerical targets. Comment that there is potential to use BREEAM materials credit criteria as this is well defined. 	
<p>Waste and recycling</p> <p><i>Comments neither in support nor objection (4):</i> One comment suggested that the wording of the waste and recycling section is replaced to include the following and for a Circular Economy Statement to be submitted:</p> <ul style="list-style-type: none"> • References to the Circular Economy, waste reduction and increases in material reuse and recycling, and reductions in waste going for disposal, by promoting innovation and a circular economy to keep products and materials at their highest use; • Encouraging waste minimisation and waste avoidance through the reuse of materials and using fewer resources in the production and distribution of products; • Ensuring that there is zero biodegradable or recyclable waste to landfill; • Meeting or exceeding the recycling targets for each of the following waste streams and generating low-carbon energy from suitable remaining waste, with reference to specific targets; and, • Designing developments with adequate and easily accessible storage space that supports the separate collection of dry recyclables. <p>One further comment suggested policy reference to developers being strongly encouraged to use materials that sequester CO₂. A further comment questioned whether these requirements should cover all development, not just new. Suggest Local Plan mentions operational waste and how this could be encouraged to be reduced.</p>	<p>605, 856, 857, 867</p>

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 98 Comments from statutory bodies and partnerships

Consultee	Reference
South Gloucestershire: Policy approach set out is supported.	610

66. CCS5: Renewable energy development

Overview: In total, 5 respondents made comments regarding policy CCS5 Renewable energy development. Key themes are identified in the table below.

Table 99 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy CCS5 <i>Comments neither in support nor objection to the policy (4):</i></p> <ul style="list-style-type: none"> One comment considered support for community-led renewable energy projects, and suggested text change including: support for renewable and low carbon energy generation developments that are led by, or meet the needs of, local communities. One comment suggested that the policy should be strengthened so that the distribution and development of renewable energy becomes mandatory and enforced through local planning policy. It furthers that 'new sites, repowered sites, and additional sites that can be supported and are viable will be supported in the plan'. One comment suggested that the policy text should be amended to include the 'repowering or life extension of existing renewable energy infrastructure'. The comment furthers states that the policy should be amended to state that 'other areas of the City may be identified as potentially suitable for wind where communities demonstrate that it is supported and is economically viable.' One comment stated that Bristol is an area potentially suitable for wind energy, and therefore including large-scale freestanding installations should be encouraged subject to a series of policy criteria. 	610, 614, 621, 856, 867

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 100 Comments from statutory bodies and partnerships

Consultee	Reference
South Gloucestershire (1): The policy encourages the utilisation, distribution and development of new renewable energy capacity. The supporting text identifies Avonmouth as an area that remains suitable for wind development. The policy approach is similar to SGC's existing policy, and the identification of Avonmouth is supported by SGC. Suggest that the policy also specifically permits the 'repowering' of existing wind installations.	610

67. Flood Risk and Water Management

Overview: In total, 2 respondents (790 and 964) made comments regarding Flood Risk and Water Management.

- **Bristol Water (790):** Suggested planning conditions for new developments which should include water efficiency measures (water efficient shower heads, lavatories and white goods). Comment regarding UK water forecasting, and that UK water companies are now working more closely to help manage such national-scale water deficits; Bristol Water make comment that they have identified the West Country as a potential donor region for water trading to other regions. If such a trading agreement is to succeed, Bristol Water will need to work with customers and key regional management organisations to establish new ways to help water users become more efficient.
- **Environment Agency (964):** Commented that this section could be stronger, and reference made to the updated Strategic Flood Risk Assessment. Reference to UKCIP18 could be made and that development needs to be safe for its lifetime (i.e. 100 years More Vulnerable and 60 years Less Vulnerable development). Concern that flood risk has not been prioritised (para 13.46) and that large areas earmarked in Flood Zone 3 are without a strategic flood risk solution in place. They furthered that Policy BCS16 on –site mitigation will not be suitable in areas of St Philips Marsh, Bristol Temple Quarter and Western Harbour, where a strategic solution is required. The EA commented that an approach to flood risk has not yet been done – a flood risk management strategy that addresses all these points should be adopted as soon as possible.

EA advise a specific policy is drafted in relation to the delivery of strategic flood risk management infrastructure. This should establish land required to be safeguarded in the plan for delivery of the scheme, together with funding and other milestones required to ensure reasonable certainty of delivery.

68. Section 14: Design and Conservation

Overview: In total, 4 respondents made comments regarding the introduction to Section 14.

Table 101 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General comments on Section 14</p> <p><i>Comments in support (1):</i> One comment supported the current design and conservation policies but, with reference to the climate emergency, requested a new approach which recognises the imperative to retrofit existing buildings with high quality glazing and solar PV or thermal collectors. It was requested to see new guidance to maximise the scope to carry out such measures wherever feasible.</p> <p><i>Comments neither support nor objection (2):</i> One comment stated that new housing should not be gated developments. One comment stated concern with proposals to amend Permitted Development rights to upward extension and demolition of existing buildings an expressed the need for stringent development standards.</p>	216, 367, 621

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 102 Comments from statutory bodies and partnerships

Consultee	Respondent Reference
<p>Historic England (1): Historic England consider that the Local Plan Review provides opportunity to identify current issues, risks, challenges and opportunities to city's historic environment and create a positive response to them.</p> <p>With reference to NPPF paragraph 18, Historic England sets out that a positive strategy is not a passive exercise but should set out how the Local Plan review will address opportunities to enhance heritage assets and CAs, how development will preserve or better reveal significance of heritage assets and how it can help put them to viable use, especially those at risk. An updated 'Our Inherited City - Bristol Heritage Framework 2015-2018) will be an important reference.</p> <p>Historic England strongly recommends preparation of a heritage topic paper setting out how relevant historic environment matters have been identified and addressed.</p>	956

69. DC1 Liveability in residential development including space standards

Overview: In total, 33 respondents made 52 comments regarding policy DC1 Liveability in residential development including space standards. Key themes are identified in the table below.

Table 103 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle</p> <p><i>Comments in support (12):</i> Many comments stated general support for the principle of the policy. In particular, the reference to residential accommodation that designed for short term occupancy and/or for identified occupier groups was supported.</p> <p>One comment stated that the approach should be flexible to ensure housing targets are met, while another comment noted the importance of Urban Living SPD in application of this policy.</p> <p><i>Comments in objection (1):</i> One comment expressed concern that no evidence (including viability) or justification has been provided to support this policy requirement and expressed concern that the cumulative impacts of policies in the plan on viability needs to be evidenced.</p> <p><i>Comments neither support nor objection (11):</i> Several comments requested clarity on the reference in policy to temporary accommodation and what constitutes short and long-term occupancy, while clarification on the definition of ‘occupier groups’ was also requested. Some respondents queried what ‘liveability’ is defined as in the policy. Clarity on these aspects of the policy were required by some respondents to understand provision of play space for children and the policy’s application in relation to co-living.</p> <p>One comment stated that the policy is unsound as it is taken from Urban Living SPD and has not been re-appraised against NPPF and NPPG.</p> <p>One comment stated that the policy should be sufficiently flexible to determine appropriate density on a site by site basis at application stage. Another comment stated that any reduction in standards should be based on evidenced need, community involvement and design quality.</p> <p>One comment stated that references to retained design policies and PAN guidance should be in the policy text. One comment felt that the policy would better sit within the Urban Living section of the plan.</p>	100, 116, 420, 442, 491, 603, 612, 647, 648, 657, 671, 700, 799, 812, 816, 818, 819, 845, 870, 884, 885, 887, 893, 923
<p>Optimum density</p> <p><i>Comments neither support nor objection (1)</i> One comment stated that building at urban living densities could jeopardise the future needs for local renewable energy generation, for example using house roofs, building facades and small spaces on street corners.</p>	637
<p>Urban Living SPD guidance</p> <p><i>Comments in objection (1):</i> One comment stated that the Urban Living SPD is not a sound planning document in its own right and should not be used to underpin requirements within a higher order development plan document, with reference</p>	420, 700, 812, 893

Key Themes	Respondent References
<p>made to a specific planning law case (High Court Ruling on 23 November 2017 involving William Davis Ltd & Ors v Charnwood Borough Council).</p> <p><i>Comments neither support nor objection (3):</i> One comment raised concern that the Urban Living SPD consultation was limited to developers and the property industry were the main active consultees, and suggested it needed wider consultation with the public, who will be most affected by it.</p> <p>Two comments expressed concern over the legitimacy of the use of the Urban Living SPD, which they consider should not impose standards beyond those of the Local Plan, a higher order development plan document, with one comment making reference made to a specific planning law case (High Court Ruling on 23 November 2017 involving William Davis Ltd & Ors v Charnwood Borough Council).</p>	
<p>Internal space standards</p> <p><i>Comments in support (1):</i> One comment expressed support for the policy but stated that clarification is needed on the wording of policy, including with reference to build to rent properties.</p> <p><i>Comments in objection (2):</i> One comment stated that the policy will prevent delivery of some types of unit and therefore affect the delivery of new homes overall. It stated that the policy should only apply to affordable housing so that market housing retains flexibility to meet market demand. One comment stated that there needs to be clear and evidenced need for the application of space standards.</p> <p><i>Comments neither support nor objection (11):</i> Several comments stated that if the Council wishes to adopt the Nationally Described Space Standard (NDSS) as a policy requirement, then this should only be done in accordance with the NPPF 2019. It was commented that the Council should consider the impacts on need, viability and timing before introducing the NDSS.</p> <p>Some comments stated that the Council should assess the potential impact of the space standards on meeting demand for starter homes and first-time buyers, as the impact is greatest on smaller 1, 2 and 3 bed dwellings. The need for flexibility in the policy was also stated.</p> <p>Clarification on the definitions of terms in the policy were sought, such as 'temporary accommodation' and 'identified occupier groups'.</p> <p>Some comments were concerned about the impact of low space standards on occupants and raised concern that this could become normalised.</p> <p>Some comments suggested that the policy needs to be caveated to accommodate co-housing and community living, which may require flexibility on minimum space standards due to the use of shared or communal living space, which do not conform to the national standards.</p>	<p>322, 420, 672, 700, 789, 812, 816, 818, 842, 877, 888, 893, 894, 904</p>
<p>Private outdoor space</p> <p><i>Comments in objection (2):</i> One comment objects to this aspect of the policy due to a lack of evidence or justification, and states that it will conflict with</p>	<p>420, 700, 812, 816, 818, 842, 888, 893, 904</p>

Key Themes	Respondent References
<p>requirements of other proposed policies. It is stated that in some developments, this policy will not be feasible without impacting on capacity and residential amenity. One comment stated that the reference to the Urban Living SPD should be removed, and any standards or regulation should be stated in the Plan itself, with full evidence and justification.</p> <p><i>Comments neither support nor objection (7):</i> Three comments stated that the policy should be applied flexibly on site by site basis, and states concern that the policy is not sufficiently justified or evidenced, and may be unfeasible in some locations alongside other requirements of the plan.</p> <p>Two comments suggested that community-led schemes should also be exempted from the requirement for providing private outdoor spaces, where there is sufficient provision of shared outdoor spaces.</p> <p>One comment considered that the definition of private outdoor space is based on balconies and comments that gardens should still be referred to as appropriate where possible. It is stated that current standards in the Urban Living SPD are not mandatory, and suggests that baseline play space should be mandatory in general housing and enforced. Any exclusions to the policy should be universally understood.</p> <p>One comment stated that outdoor space standards should be listed within the Local Plan Review (rather than cross-referencing the Urban Living SPD) and viability tests alongside other policy requirements.</p>	

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 104 Comments from statutory bodies and partnerships

Consultee	Reference
Sports England (1) Sports England encourages use of its Active Design guidance and developer's checklist, and for development in Bristol to be designed in line with Active Design principles. Sports England have provided a suggested model policy for the Local Plan [see rep folder].	442

70. DC2 Tall buildings

Overview: In total, 26 respondents made 33 comments regarding policy DC2 Tall buildings. Key themes are identified in the table below.

Table 105 Summary of consultation responses to elements of the Policy

Key Themes	Theme References
<p>General principle of policy</p> <p><i>Comments in support (16):</i> The majority of comments expressed general support for the policy approach and wording. One comment stated that proposals should follow guidance in the Urban Living SPD.</p> <p>One comment specifically supported the emphasis in the policy on realistic photographic renderings, however noted that there is no reference in the policy to avoid masking topography, which has been previously included in tall building policies and considered that this should be reinstated to avoid harming views across the city.</p> <p>Support for tall buildings meeting the requirements of the policy was expressed for the following locations: Bedminster Green, Temple Quarter and Redcliffe Quarter. One comment considered that Diagram 6.1 should be clearer on where tall buildings are acceptable, or it should be stated explicitly in the policy.</p> <p><i>Comments in objection (6):</i> Several comments objected to the principle of tall buildings within Bristol, considering that they would have a detrimental impact on the heritage, character and views of Bristol, while also having negative social effects including social isolation. Comments also referred to the topography of Bristol as being poorly suited to tall buildings, and better suited to mid-rise buildings. One respondent commented that tall buildings should not be located in the Western Harbour.</p> <p>It was commented that tall buildings are not an appropriate method to increase density, while some comments objected to the statement in the policy that tall buildings communicate ambition, energy and innovation, considering this to be an unsubstantiated comment not suited to a policy document.</p> <p>One respondent raised concern with the implementation of the policy, considering that it will be up to the development management process to argue against proposals for tall buildings.</p> <p><i>Comments neither support nor objection (3):</i> One respondent commented that there is no mention in the policy of the Ctiy Centre Framework which was consulted on in March 2018.</p> <p>One respondent considered that this policy would fit better in the section on Urban Living, and felt that the wording of the policy suggests tall buildings are acceptable in all growth areas (DS1-DS14) which is not the case; as such, locations for tall buildings needs to be clarified.</p> <p>One comment queried whether further clarity could be provided on evidence</p>	<p>6, 48, 367, 491, 603, 612, 627, 639, 646, 648, 656, 657, 816, 818, 824, 836, 841, 843, 857, 868, 882, 885, 891, 892, 893</p>

Key Themes	Theme References
studies required to support future planning applications such as daylighting and overshadowing, wind and security assessments.	
Locations of tall buildings (U1) <i>Comments neither support nor objection (3):</i> One comment stated that the principles in policy DC2 should be applied to specify areas that would be inappropriate for development of tall buildings, including Bedminster Green. One comment considered that Diagram 6.1 should be clearer on where tall buildings are acceptable, or it should be stated explicitly in the policy. One comment stated that SPD11 provides for a tall building on Tyndall Avenue in the University precinct, but that this is not clearly defined as an area suited to tall buildings in Diagram 6.1 It is requested to be included.	6, 836, 887
High quality design <i>Comments in support (1):</i> One comment was made in general support of this policy. <i>Comments neither support nor objection (1):</i> One comment made a suggestion that tall buildings be defined as those that exceed 8 storeys above ground level.	6, 868
Harmful impacts <i>Comments in support (1):</i> One comment stated general support and appreciation of this policy.	892
Urban Living SPD guidance <i>Comments in support (1):</i> One comment was made in general support of this policy. <i>Comments neither support nor objection (1):</i> One comment considered that policy DC2 is not sound by conferring development plan status onto a document (the Urban Living SPD) which does not have statutory force and has not been subject to the same process of preparation, consultation and examination. It suggests the reference to the SPD is deleted.	672, 868

71. DC3: Local Character and Distinctiveness

Overview: In total, 50 respondents made 52 comments regarding policy DC3 Local Character and Distinctiveness. A petition was submitted in relation to advertising, which totalled an additional 1,850 respondents.

Key themes are identified in the table below.

Table 106 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy: Comments in support (1): One comment expressed support for the protection and enhancement of the special historic character of Bristol.</p> <p><i>Comments neither support nor objection (9):</i> Some comments considered that community led schemes should be exempted from the policy provided that they can present evidence of wide consultation and sufficient local community support for their designs.</p> <p>Two comments expressed general support for the policy but considered that requirement (vi) of the policy text conflicts with the first part of the policy and is inconsistent with the approach outlined in draft policy DC2 (Tall Buildings).</p> <p>One comment stated that there should be height restrictions in a Conservation Area, while another stated concern that there could be ‘town cramming’ as a result of random infill, while another comment was concerned that the policy is biased against areas which are already higher density and potentially overcrowded, as it requires development to complement the existing scale and massing of an area.</p> <p>One comment stated that the policy would benefit from being more specific on suggesting the areas that the reference to ‘innovative design solutions’ would cover, including some Outer Urban Areas where innovative solutions would benefit the area.</p> <p>One comment expressed concern that there is no mention of the City Centre Framework which was consulted on in March 2018 in the policy.</p>	48, 367, 603, 646, 798, 816, 818, 842, 894, 884, 904
<p>Criteria for local character and distinctiveness</p> <p><i>Comments neither support nor objection (1):</i> One comment made specific queries about the wording of the policy in relation to the wording of existing design policies BCS21 and DM26.</p>	646
<p>Comments on advertising (40): While not part of the draft policy DC3, many respondents commented in this section on the need for a policy in the plan relating to outdoor advertising/billboards. These comments considered that the proliferation of outdoor advertising did not reflect local character and distinctiveness, and in the case of digital adverts, pose a risk to highway safety. The majority of these comments requested a policy or a more robust approach towards outdoor advertising in Bristol, including a presumption against their introduction. It was stated that currently, local residents are required to object to each application.</p>	6, 316, 451, 452, 453, 454, 455, 456, 457, 459, 460, 461, 463, 464, 468, 469, 470, 471, 472, 478, 484, 498, 499, 509, 513, 515, 534,

Key Themes	Respondent References
A petition was submitted in relation to this aspect of the local plan, which totalled an addition 1,850 respondents.	564, 586, 603, 624, 660, 664, 687, 702, 706, 746, 775, 794, 811

72. Section 15: Health and Wellbeing

Overview: In total, 5 respondents made comments regarding the introduction to Section 15. Key themes are identified in the table below.

Table 107 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
General comments on Section 15 <i>Comments neither support nor objection (4):</i> All comments made suggestions for additions to the Health and Wellbeing section. These suggestions included: <ul style="list-style-type: none"> Addressing noise-generating uses such as busking; More detailed policies on encouraging sustainable development and preventing undesirable development; A policy on advertising (see below section); The creation of an explicit Social Value policy statement as in Salford and the requirement of a Social Value Strategy in planning applications; A need to address education and nursery provision and children's play. 	37, 372, 873 964
Comments on advertising (42): While not part of the policies within the Health and Wellbeing section many respondents commented in this section on the need for a policy in the plan relating to outdoor advertising/billboards. These comments considered that the proliferation of outdoor advertising is damaging to health and wellbeing of the population due to the potential for harm on individual self-image, personal debt and physical health (e.g. fast food advertising). In the case of digital adverts, it was considered by some comments that they also damage health through light pollution and the risk to highway safety due to distraction. Alongside concerns raised in response to policy DC3 on the effects of advertising on local character, the majority of these comments requested a policy or a more robust approach towards outdoor advertising in Bristol, including a presumption against their introduction. It was stated that currently, local residents are required to object to each application.	273, 316, 451, 452, 453, 454, 455, 456, 457, 459, 460, 461, 463, 464, 468, 469, 470, 471, 472, 478, 484, 498, 499, 509, 513, 515, 534, 564, 586, 621, 624, 627, 644, 660, 664, 687, 702, 706, 746, 775, 794, 811

Table 108 Comments from statutory bodies and partnerships

Consultee	Reference
Environment Agency (1): Comment provided regarding pollution control – Refer to pollution prevention principles and general practice guidance available on gov.uk.	Ref 964

73. HW1: Pollution Control and Water Quality

Overview: In total, 14 respondents made 16 comments regarding policy HW1 Pollution Control and Water Quality. Key themes are identified in the table below.

Table 109 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy:</p> <p><i>Comments in support (1):</i> One comment stated support for the requirement for new development to take into account its potential impact on pollution and the impact of existing sources of pollution. It stated that more clarity is required on the implementation of the policy in Areas of Growth and Regeneration where some existing industrial uses are currently high noise and air pollutants but will be redeveloped in the future.</p> <p><i>Comments neither support nor objection (3):</i> One comment requested that further clarity be provided on the studies required to be completed to support future planning applications. One comment stated that graffiti and refuse management are major problems to the north of the city centre and need attention.</p>	631, 709, 857, 957
<p>Mitigation for potentially polluting development</p> <p><i>Comments in support (1):</i> One respondent expressed general support for this aspect of the policy.</p>	646
<p>Development sensitive to pollution - Agent of change</p> <p><i>Comments in support (6):</i> Comments expressed general support for the principle of the 'Agent of Change' approach, which one respondent considered provides clarity in the Local Plan, while another considered the approach would support the night time economy.</p> <p>One respondent stated that the principle should reference industries, and apply also to fumes, dust, vibration, smell and light. It was stated that this policy should apply to changes of use as well as new development. One respondent stated that planning and licensing should take a joined-up approach to see the 'bigger picture' in relation to this issue.</p> <p>One comment stated that the policy could be more rigorous as there is evidence that this approach has not been successful in protecting existing uses from noise complaints from new residential development. It therefore recommended that the policy is revised to require that applicants submit an Agent of Change Statement to demonstrate that the ongoing viability of existing uses will not be threatened, including the consideration of the use of legal Deeds of Easement where necessary.</p> <p><i>Comments neither support nor objection (4):</i> Two comments stated that the policy requires further clarification on issues including: the date it will come into effect; the approach to historic premises which may not be in current use; the retrospective application of the policy and whether the policy would be applicable to office-to-residential and changes of use or amendment applications. It was considered that the policy could be more specific, as terms such as 'considered desirable' are ambiguous. It was suggested that acoustic and noise monitoring should be made mandatory at peak operating times, that deeds of easement</p>	487, 621, 641, 646, 778, 783, 795, 797, 817, 894

Key Themes	Respondent References
<p>areas could be established around venues and event sites and that a neighbour notification scheme from pre-application stage onward could be applied to notify venues of development proposals.</p> <p>One comment stated that consideration of operational use of premises under the Agent of Change should protect the night-time economy and residents and businesses from poorly thought out development. One comment stated that the Trinity Centre in Old Market needs protecting.</p>	
<p>Water Quality <i>Comments in support (1):</i> This comment expressed general support for this aspect of the policy.</p>	646

Detailed comments from statutory bodies and partnerships were provided as follows:

Table 110 Comments from statutory bodies and partnerships

Consultee	Reference
Wessex Water (1) Request policy text is expanded to identify Sewage Treatment Works and Sewage Pumping Stations as requiring protection from undue operational constraints.	Ref 709

74. HW2: Air Quality

Overview: In total, 16 respondents made 29 comments regarding policy HW2 Air Quality. Key themes are identified in the table below.

Table 111 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy</p> <p><i>Comments in support (2):</i> These comments expressed general support for the policy.</p> <p><i>Comments neither support nor objection (12):</i> Some comments considered that the policy could be stronger, with one respondent stating that illegal levels of air pollution in Bristol is its single biggest issue and should be the priority of the Local Plan. It was considered that the policy is weak partly due to the lack of an Air Quality Action Plan/Clean Air Plan. It was suggested that air quality could be addressed in an SPD, while it was also suggested that wood-burning stoves need to be addressed, as well as ensuring that transport emissions are reduced around schools, nurseries and other children's facilities. One comment recognised that the policy is consistent with Strategic Priority 3 of the Joint Spatial Plan.</p> <p>Several comments related to the policy wording, with requests made that the policy provides clarity on supporting documents required for planning applications relating to air quality, while another stated that references to PM10 should also include PM2.5, which are particles more dangerous to human health. One comment stated that the policy wording is not clear on whether development with 'potential' for significant local emissions would be permitted close to sensitive uses subject to mitigation. One comment suggested that the policy should require an Air Quality Assessment in planning applications, and for all major development to be at a minimum of neutral on its effects on air quality.</p> <p>Two comments related to transport. One stated that consulting a range of disability groups on public transport accessibility could reduce reliance on taxis and private cars, as well as an improved and better integrated bus system. One comment objected to trains idling on the Severn Beach line, requiring a double-track system to reduce air quality impacts.</p> <p>One comment stated that the pollution and CO2 emissions from overseas students travelling to Bristol should be addressed in this policy or policy CCS2, requiring financial contributions to offset the environmental impacts when developing Purpose Built Student Accommodation.</p>	37, 76, 487, 612, 621, 646, 791, 805, 807, 811, 830, 857, 870, 952
<p>Impact of new development</p> <p><i>Comments in support (2):</i> Comments expressed general support, with one comment on the importance of a holistic approach to air pollution in new development, including sustainable travel and green energy.</p> <p><i>Comments neither support nor objection (6):</i> Two comments stated that harmful emissions should be kept away from walking routes. One comment suggested the policy should recognise the benefits of retaining trees in development for air quality purposes.</p>	37, 646, 791, 794, 797, 805, 811, 830

Key Themes	Respondent References
<p>Two comments raised concern that outdoor advertising promotes car ownership which is contrary to the Plan's ambitions for modal shift, and should therefore be addressed in policy.</p> <p>One comment stated the need for a transport network which addresses air quality impacts and expressed concern that the Joint Spatial Plan would not achieve this, stating that Bristol City Council should take this into account in the pollution policies, particularly on car emissions.</p>	
<p>Specific local air quality impact: <i>Comments in support (2):</i> Of the comments in support of this aspect of the policy, one respondent specifically expressed support for the focus on reducing air pollution through encouraging the use of sustainable transport modes. It was stated that the measures set out in the Joint Local Transport Plan 4 should be recognised in the Local Plan Review, which include improving efficiency of freight movements; improvements to public transport and walking/cycling networks; and using mechanisms to discourage car use in central Bristol.</p> <p><i>Comments neither support nor objection (1):</i> One comment considered that the policy is not strong enough to routinely prevent inappropriate development.</p>	646, 811, 830
<p>Development in AQMAs <i>Comments in support (1):</i> One comment expressed general support for this aspect of the policy.</p> <p><i>Comments neither support nor objection (3):</i> One comment considered that the policy is not strong enough to routinely prevent inappropriate development. The comment expressed support for the intention to improve AQMAs but considered that the policy may not be effective. Rather, it considered that ensuring development is in locations which reduce journey lengths and discourage private car usage would bring about the most improvement.</p> <p>One comment stated that St Philip's Marsh should be included in the clean air zone to benefit existing residents and new proposed residential development.</p>	646, 811, 830, 894

75. HW3: Takeaways

Overview: In total, 12 respondents made 16 comments regarding policy HW3 Takeaways. Key themes are identified in the table below.

Table 112 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p>General principle of policy:</p> <p><i>Comments in support (7):</i> The majority of comments expressed general support for the principle of the policy. Two comments recommended that the approach is also applied to the proximity and concentration of off-licenses to betting shops, due to the negative effects of the availability of cheap alcohol and easy gambling, with harmful impacts on shopping areas.</p> <p>One comment expressed support for the policy specifically in the central area of Bristol.</p> <p><i>Comments in objection (1):</i> One comment, while supportive of promoting healthier lifestyles and tackling obesity, objected to the policy on the basis that it is unsound. The respondent considered that the policy assumes all A5 uses to be harmful to health, which is unsubstantial by evidence, and fails to recognise the benefits of some of these businesses in terms of employment, community support or sustainable operations. It considered that other use classes such as A1 and A3 may also provide low nutrition, high calorie food. The respondent stated that the policy is not consistent with Government policy on supporting economic development and town centres and lacks justification. It was noted that similar policies have been found unsounds in other Local Plans or have failed to be effective when enacted.</p> <p><i>Comments neither support nor objection (2):</i> Two comments stated that fast food advertising contributes to unhealthy lifestyles and requested that a policy addressing outdoor advertising is included in the plan, to support policy HW3, for example banning such adverts within a certain distance of schools.</p>	100, 116, 216, 289, 646, 793, 794, 797, 807, 811
<p>Distance from youth facilities</p> <p><i>Comments in support (1):</i> One respondent supported the policy, however they queried if it is necessary to include the qualification “if they would be likely to have a harmful influence on health and the promotion of healthy lifestyles”.</p> <p><i>Comments in objection (2):</i> One comment stated that the policy does not define what constitutes 'young people' or 'youth facilities' and does not take into account that A1 and A3 uses can also sell unhealthy foods. It considered that the policy also fails to take into account that schools are closed for much of the year (weekends and school holidays), stating that the policy is not based on evidence or sound justification. The respondent considered it unclear how the policy could be implemented and that the practical impacts of the policy have not been understood, such as mapping its land use consequences.</p> <p>One comment considered that the policy is not clear on whether it would apply to leisure areas such as Avonmeads, and raised concern about the application of the policy on mixed A3/A5 uses. It was stated that the policy goes beyond the</p>	289, 504, 603, 797, 807

Key Themes	Respondent References
<p>intentions of the NPPF and should therefore be reconsidered.</p> <p><i>Comments neither support nor objection (2):</i> One comment stated that the distance from youth facilities should be 800m and recommended a Hot Food Takeaway SPD is produced. One comment stated that retained policies BCS7 and BCAP13 should be listed in paragraph 15.2.9.</p>	
<p>Concentration and clustering of takeaways:</p> <p><i>Comments in support (1):</i> One comment expressed general support for this aspect of the policy.</p>	807

76. Utilities and Minerals: Retained Policies

Only 1 respondent (Ref 641) made comments relating to this section, specifically with regard to minerals. It stated that reference should be made to the important secondary aggregate facility at Avonmouth, with the safeguarding of these facilities expressly stated in the policy text.

77. Consultation Process

A total of 18 respondents made comments regarding the Consultation Process. Key themes have been identified as follows.

Table 113 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p><i>Comments neither in support nor objection (11)</i></p> <ul style="list-style-type: none"> One comment referred to the Plan's consultation process, stating whether the current consultation constitutes Regulation 18 scoping which will be followed by Regulation 19. Consider that this needs to be reflected within the Local Plan. One comment considered that insufficient information has been published in relation to Local Green Space, and suggests that this will need to be consulted on thoroughly again. One comment requested that it is necessary to make clear which partners have been invited to participate in drafting the Plan and the One City plan. One comment considered that there should be greater emphasis on meaningful consultation. Several comments indicated that the plan has not been well-published, with several comments requesting to be informed of future stages of the Plan. <p><i>Comments in objection (7)</i></p> <ul style="list-style-type: none"> Several comments objected to the consultation process, as there were no neighbour notifications issue and the consultation process was poorly advertised. One comment was concerned about how options had been presented within engagement sessions (particularly in Bishopsworth). Several comments objected to the level of evidence made available at this stage of consultation. Several comments throughout the plan have reference that BCC are seeking to introduce standards with no evidence. Several comments objected to consultation on the Local Plan Review at the same time as the examination is taking place for the JSP and JLTP4. This appeared to prejudge the outcomes of the examination. Several comments considered that concerns raised in 2018 Consultation had not been addressed within this draft of the Plan. One comment considered that consultation during religious festival (i.e. Eid) does not allow for sufficient time for people to plan to respond 	<p>109, 117, 169, 402, 420, 449, 532, 629, 639, 644, 649, 744, 791, 794, 805, 823, 861, 875</p>

78. Plan Structure

A total of 10 respondents made comments regarding the Plan Structure. Key themes have been identified as follows.

Table 114 Summary of consultation responses to elements of the Policy

Key Themes	Respondent References
<p><i>Comment in support (1):</i> One comment in support considered that the Plan was overall well laid out.</p> <p><i>Comments neither in support nor objection (8):</i></p> <ul style="list-style-type: none"> • One comment considered that Green Space maps are quite blurred and therefore it is hard to identify areas. • One comment considered that there was insufficient consideration of the delivery of these policies. • One comment considered that it was unclear how the retained policies in Plan had been considered, and where to find these. Several comments considered that the structure of the document was difficult to interpret – i.e. site allocations, draft allocations, retained policies and the impact of the JSP. One comment considered it was unclear why the Growth and Regeneration Area and the Green Belt sites are not included within the Development Allocations document. One comment considered that policies to be removed should be listed with explanation. • One comment considered that the design of Plan covers should be different for each individual document to enable each to be identified quickly. • One comment support the consolidation of three documents that form the Local Plan, into one. • One comment queried why the Air Quality Action Plan and Local Transport Plan not listed as plan documents on BCC website 	<p>56, 152, 166, 603, 609, 645, 866, 871, 878, 952</p>

Appendix A – Bristol Local Plan Review Draft Site Allocations

Table 1 Summary of comments received on draft site allocations

Area	Draft Site Allocation	Comments	Respondent reference(s)
Ashley	BDA0101 Land opposite 200-208 Mina Road	<p>A total of 12 respondents made a number of comments regarding this site.</p> <p><u>Proposed allocation:</u> <i>Comments neither in support nor objection (6):</i> Half the comments suggested that potential development should be community-led or include custom housebuilding, given a noted demand within the area. Several respondents were concerned that the garages on the site are not mentioned in the allocation, stating that they provide important parking and a valuable community resource which would be lost through development. One comment considered that the impact on the loss of car-parking, traffic and impact on air quality should be assessed.</p> <p><i>Comments in objection (1):</i> One comment objected to having a residential allocation and instead recommended a community-led mixed-use designation, or better suited to extension of the allotments or City Farm.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (3):</i> Two comments raised concern about restricted access to the site due to road traffic caused by new development.</p> <p>Two comments also raised the issue of flood risk and subsidence on houses on opposite terraces as a notable constraint in the area. The Environment Agency (EA) noted that the site access is through Flood Zones 2 and 3. EA also noted that there are numerous culverts in proximity to the site including the Northern Stormwater Interceptor. The EA further stated that no development would be allowed within 8 metres of the edge of the Main River culvert, so this should be carefully considered. The EA also noted that Wessex Water and Network Rail should be consulted.</p> <p>There was also concern (2) for the rural character of the area, with comments requesting that development should consider the impact on local wildlife on the Narrowways Site of Nature Conservation, the City Farm and the Allotments. Ashley Vale as a whole should be protected</p> <p><u>Estimated capacity of 20 homes:</u> There was some concern (3) that 20 homes would be far too dense when compared to the wider area, with one respondent stating that the maximum site density should not exceed 8 homes.</p>	393, 467, 474, 747, 748, 751, 788, 789, 842, 869, 904, 964
	BDA0102 Land at 17-47 Lower Ashley Road	<p>One respondent made comments regarding this site.</p> <p><u>Draft development considerations:</u> <i>Comments neither in support nor objection (1):</i> The Environment Agency (EA) noted that part of the site falls within Flood Zone 2, stating that the sequential layout of the site needs to be carefully considered with 'More Vulnerable' uses in Flood Zone 1 or located on upper floors.</p>	964

Area	Draft Site Allocation	Comments	Respondent reference(s)
Avonmouth and Lawrence Weston	BDA0205 Land south of Gloucester Road	<p>A total of 4 respondents made a number of comments regarding this site.</p> <p><u>Proposed allocation:</u> <i>Comments neither in support nor objection (2):</i> One respondent noted that the site is liable to be cut off by railway line closures, stating that houses to the west of the railway would be cut off when works are being done on the line. National Grid, while not seeking to object to this allocation in principle, noted that at this stage, land within the allocation lies within the limits defined by the Development Consent Order for the construction, operation and maintenance of the Hinkley Point C Connection Project.</p> <p><i>Comments in objection (1):</i> The Environment Agency objected to 'More Vulnerable' development location. The EA stated that the proposed allocation for 140 homes is located within the breach hazard bandwidth identified in the Strategic Flood Risk Assessment (SFRA) Level 2 and as such should be considered as Tidal Flood Zone 3a. It was further noted that there would be risk to life due to the proximity to the defences.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor object (2):</i> One comment requested that developers demonstrate that the development is consistent with the requirements of Draft Policy HW1 and Retained Policy DM35, relating to pollution in particular with regard to its proximity to the Avonmouth Industrial Area.</p> <p><u>Estimated capacity of 140 homes</u> <i>Comments neither in support nor object (1):</i> One further comment stated that development would also need to respect the setting of heritage assets on Gloucester Road and Clayton Street, which will limit the overall scale of development</p>	280, 638, 641, 964
	BDA0206 Former Sea Mills Children Centre	<p>A total of 3 respondents made a number of comments regarding this site.</p> <p><u>Proposed allocation:</u> <i>Comments neither in support nor object (3):</i> Two comments suggested that the site be specifically allocated to custom housebuilding or community-led housing. Citing the Conservation Area Appraisal, one comment considered that the Children's Centre should not be demolished, as the building was designed with both community input and to fit within the 'garden suburb' nature of the Conservation Area character and appearance.</p> <p><u>Estimated capacity of 10 homes:</u> <i>Comments in objection (1):</i> One respondent objected to the development due to the low-density nature of the Sea Mills area. The respondent was concerned that 10 dwellings implies a considerable increase in density and argues that the development is more likely to harm than enhance the Conservation Area.</p>	576, 747, 748
	BDA0207 Land adjacent to Custom House	<p>A total of 4 respondents made a number of comments regarding this site.</p> <p><u>Proposed allocation:</u> <i>Comments neither in support nor object (2):</i> One respondent noted that the site is liable to be cut off by railway line closures stating that houses to the west of the railway would be cut off when works are being done on the line. National Grid, while not seeking to</p>	280, 638, 641, 964

Area	Draft Site Allocation	Comments	Respondent reference(s)
		<p>object to this allocation in principle, noted that at this stage, land within the allocation lies within the limits defined by the Development Consent Order for the construction, operation and maintenance of the Hinkley Point C Connection Project.</p> <p><i>Comments in objection (1):</i> The Environment Agency (EA) stated that it understands that Bristol City Council are re-running the recent Avonmouth Severnside Enterprise Area (ASEA) model to provide scenarios for 100 years. The EA stated that site BDA0207 could be screened against this model to determine its suitability and to update the Strategic Flood Risk Assessment.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor object (1):</i> One comment requested that developers demonstrate that the development is consistent with the requirements of Draft Policy HW1 and Retained Policy DM35, relating to pollution in particular with regard to its proximity to the Avonmouth Industrial Area.</p>	
Bedminster	BDA0302 Land to West of Ashton Gate Stadium, Marsh Road / Winterstoke Road	<p>A total of 3 respondents made a number of comments regarding this site.</p> <p><u>Proposed allocation:</u> <i>Comments in support (1):</i> One respondent expressed full support of the allocation. The comment requested that the boundary of the allocation is amended and the wording of the of the supporting text is amended, to provide flexibility on the mix of uses and to ensure that these are informed by market conditions. This will support the deliverability and viability of the site is ensured. It was requested that clear acknowledgment is made of the opportunities for well-designed tall buildings, taking in to account the residential towers at Duckmoor Road and the new Williams Stand.</p> <p><i>Comments neither in support nor object (2):</i> Sport England requested more clarity about the sport included in the mixed-use allocation, specifically asking whether it is to be for community or commercial sport.</p> <p>The Environment Agency (EA) commented on the opportunity to open up the river and deliver a net gain and environmental enhancements. The EA also commented on the opportunity to improve the flow underneath Winterstoke Road and prevent siltation of the Old Colliters Brook. The EA noted that access to the Main River for maintenance needs to be considered (8 meters).</p>	442, 829, 964
	BDA0303 Former Ashton Sidings	<p>A total of 3 respondents made a number of comments regarding this site.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor object (3):</i> One comment was concerned that the site is in the vicinity of the planned city centre to Bristol Airport mass transit route and requested that consideration is given to the possibility of underground rail tunnel works and a station.</p> <p>In partnership with Homes England, one comment stated how collaboration is ongoing with Bristol City Council to ensure that forthcoming development proposals will benefit from suitable access via the Ashton Gate Underpass. The respondent stated that consultation had taken place with BCC Highway officers to confirm that the proposed layout and access arrangement will not interrupt the effective operation of the current or future Metrobus services that run along the site boundary, and that the proposed access is a highway compliant arrangement. The comment suggested an amendment to reflect additional technical design and</p>	253, 524, 964

Area	Draft Site Allocation	Comments	Respondent reference(s)
		<p>studies.</p> <p>The Environment Agency (EA) stated that the Tidal and Fluvial flood zone is in very close proximity to the site, and therefore climate change needs to be included for the Sequential Test and flood risk management. They noted that access and egress need to be carefully considered. Longmoor Tunnel is in close proximity to the site and an 8-metre set back distance will be required from the edge of the culvert. Loading on the culvert would not be acceptable. A Flood Risk Activity Permit would be required over and above the need for planning permission.</p> <p><u>Estimated capacity of 150 homes:</u> <i>Comments neither in support nor objection (1):</i> One comment suggested the site allocation capacity is increased to 260 homes through an urban living approach, consistent with the minimum density threshold and the site's location.</p>	
	BDA0304 1-25 Bedminster Down Road	<p>A total of 3 respondents made a number of comments regarding this site.</p> <p><u>Proposed allocation:</u> <i>Comments neither in support nor objection (1):</i> Sport England were concerned over the presence of Ju-Jitsu Dojo gym, stating that it will need to be replaced in line with the NPPF and requested the confirmation of its replacement</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (2):</i> Two comments were concerned about the poor design of the road system noted that it is highly dangerous to both cyclists and pedestrians. The comments also noted poor air quality, which is considered to be an issue in the area. The comments suggested that a segregated two-way cycle path should be built between West Street and Bedminster Down Road/Bedminster Road Junction as part of the development.</p>	442, 856, 867
	BDA0305 233- 237 West Street	<p>One respondent made one comment regarding this site.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (1):</i> One comment raised concern that the site is in the vicinity of the planned city centre to Bristol Airport mass transit route and requested that consideration is given to the possibility of underground rail tunnel works and a station.</p>	253
	BDA0306 Land at Marsh Lane / Winterstoke Road	<p>One respondent made one comment regarding this site.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (1):</i> One comment stated that Marsh Lane provides a low-traffic route for cyclists, however it is currently not in a good state or integrated into the city's cycle network. The respondent suggested that any development on the site should provide good quality cycle infrastructure. The respondent also suggested that development should provide suitable access from Marsh Lane, with appropriate highway widening, footpath improvements and enhanced access for cyclists as part of a low traffic alternative route extending the segregated cycle path along Winterstoke Road.</p>	856

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

Area	Draft Site Allocation	Comments	Respondent reference(s)
Bishopston and Ashley Down	BDA0401 Land at Gloucester Road / Merton Road	One respondent made one comment regarding this site. <u>Draft development considerations</u> <i>Comments neither in support nor objection (1):</i> One comment raised concern that the site is in the vicinity of the planned City Centre to North Fringe mass transit route, and requested that consideration is given to the possibility of underground rail tunnel works and a station.	253
	BDA0401 Land adjacent 321 Gloucester Road	One respondent made one comment regarding this site. <u>Draft development considerations</u> <i>Comments neither in support nor objection (1):</i> One comment raised concern that the site is in the vicinity of the planned city centre to North Fringe mass transit route and requested that consideration is given to the possibility of underground rail tunnel works and a station.	253
Brislington East	BDA0601 Land at Latimer Close	One respondent made one comment regarding this site. <u>Proposed Allocation</u> <i>Comments neither in support nor objection (1):</i> One comment raised concern that the development site is a local-valued open space and that without compensatory open space or tree planting, the development is contrary to goals of the One City Plan and the commitments to increase canopy cover.	909
Brislington West	BDA0702 Land at Marmalade Lane (south)	A total of two respondents made a number of comments regarding this site. <u>Proposed Allocation</u> <i>Comments neither in support nor objection (2):</i> One comment raised concern that the development site is a local open space and that without compensatory open space or tree planting, the development is contrary to goals of the One City Plan and the commitments to increase canopy cover. The Environment Agency (EA) raised concern that a small part south of the site is within Flood Zone 2 and requested that this be removed from the allocation. The EA would be looking for a sequential layout of the site from the developer who would need to locate buildings in Flood Zone 1.	909, 964
	BDA0703 Land at Marmalade Lane (north)	A total of seven respondents made a number of comments regarding this site. <u>Proposed Allocation</u> <i>Comments neither in support nor objection (7):</i> All seven responses suggested that the site should be allocated for a community-led housing allocation and two comments also suggested custom housebuilding.	698, 729, 747, 748, 751, 789, 904
Clifton Down	BDA1001 Land west of Hampton Lane	A total of seven respondents made a number of comments regarding this site. <u>Proposed Allocation</u> <ul style="list-style-type: none"> <i>Comments in support (1):</i> One comment was in support of the proposed allocation, as it represented a way to consolidate existing haphazard development. 	37, 405, 409, 423, 428, 776, 907

Area	Draft Site Allocation	Comments	Respondent reference(s)
		<ul style="list-style-type: none"> <i>Comments in objection (1):</i> One comment objected to the proposed allocation due to concerns about noise generated by neighbouring uses and the loss of current employment spaces. <i>Comments neither in support nor objection (1):</i> One respondent requested that small scale start up enterprises are allocated with residential units above them <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (6):</i> 3 comments were concerned about the loss of green infrastructure from the site. Four respondents were concerned about access to the site; with specific concern for emergency, delivery and waste-collection vehicles. There was also concern for waste storage on Hampton Lane. Two respondents stated that they would not want student accommodation on this site or any temporary accommodation. Two respondents also requested that the amount of car parking be limited with one requesting the installation of cycle storage.</p> <p><u>Estimated capacity of 10 homes:</u> <i>Comments in support (1):</i> One comment supported up to 10 homes on the site.</p>	
	BDA1002 Land at Whiteladies Gate	<p>A total of seven respondents made a number of comments regarding this site.</p> <p><u>Proposed Allocation</u></p> <ul style="list-style-type: none"> <i>Comments in objection (2):</i> Two comments objected to the proposed allocation stating that this should be retained for commercial use, given the current adjacent noise generating uses. <i>Comments neither in support nor objection (3):</i> Two comments suggested the designation of this space as open space (one requested LGS designation while the other asked for ROS). Another respondent was against open space designation stating that it would cause antisocial behaviour. <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (3):</i> Two comments voiced concern for existing green infrastructure with one seeking the protection of the wildlife corridor and the other requesting hedge boundaries rather than walls. One comment was concerned about short-term rentals and requested they were not permitted,</p> <p><u>Estimated capacity of 10 homes:</u> <i>Comments in objection (2):</i> Two comments suggested a maximum capacity of 8 homes instead of 10.</p>	37, 405, 409, 423, 428, 776, 907
	BDA1003 Land Adjacent Alma Vale Road and Alma Court	<p>A total of six respondents made a number of comments regarding this site.</p> <p><u>Proposed Allocation</u> <i>Comments in objection (1):</i> One comment objected to the allocation for residential development and suggested the retention of car parking space. (the respondent also asked for the car park to be enlarged to four storeys).</p> <p><i>Comment in support (1):</i> One comment expressed support for the allocation provided that the Grade II listed building was not impacted.</p>	405, 409, 423, 428, 776, 907

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

Area	Draft Site Allocation	Comments	Respondent reference(s)
		<p><u>Draft development considerations</u> <i>Comments in support (2)</i>: Two comments were concerned about the loss of green infrastructure with one respondent requesting hedges instead of walls, or creation of a green park on the site.</p> <p><i>Comments neither in support nor objection (5)</i>: Two respondents were concerned about access to the site; with specific concern for emergency, delivery and waste-collection vehicles. One comment stated that they would not want student accommodation or short-term rentals (Airbnb) on this site. Two respondents also requested that the amount of car parking be limited with one requesting the installation of secure cycle storage and electric Car Club spaces. There was also one request that the development not exceed 4 storeys.</p> <p><u>Estimated capacity of 10 homes</u>: <i>Comments in objection (1)</i>: One comment requested that the maximum capacity should be fewer than 10 homes, low rise and does not permit temporary accommodation or short-term lets. .</p>	
	BDA1004 Barley House, Oakfield Grove	<p>A total of two respondents made a number of comments regarding this site.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (2)</i>: One comment requested the improvement of the site with gardens. Another respondent requested that no short-term rentals are allowed and that no parking permits are issued.</p> <p><u>Estimated capacity of 20 homes</u>: <i>Comments in objection (1)</i>: One comment stated that 20 homes are too many.</p>	428, 907
Cotham	BDA1101 Land at Gibson Road	<p>One respondent made one comment regarding this site.</p> <p><u>Proposed Allocation</u> <i>Comments neither in support nor objection (1)</i> One response stated that the land is ideal for low density homes.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (1)</i>: One response stated that house designers can take advantage of the sloped land and mentioned that relocating the access road to one side of the plot would allow more depth for buildings.</p>	776
	BDA1102 Land at Sydenham Lane	<p>One respondent made one comment regarding this site.</p> <p><u>Proposed Allocation</u> <i>Comments neither in support nor objection (1)</i>: One response stated that the land is ideal for low density homes.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (1)</i>: One response stated that house designers can take advantage of the sloped land and mentioned that relocating the access road to one side of the plot would allow more depth for buildings.</p>	776

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

Area	Draft Site Allocation	Comments	Respondent reference(s)
Easton	BDA1201 16-20 Fishponds Road	<p>A total of two respondents made a number of comments regarding this site.</p> <p><u>Proposed Allocation</u> <i>Comments in objection (1):</i> One comment stated that would disagree with a community-led housing designation for this site.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (1):</i> One comment raised concern that the site is in the vicinity of the planned city centre to East Fringe mass transit route and requested that consideration is given to the possibility of underground rail tunnel works and a station.</p>	253, 646
Eastville	BDA1301 Stapleton Cricket Club	<p>A total of 60 respondents made a number of comments regarding this site.</p> <p><u>Proposed Allocation</u> <i>Comments in objection (29):</i> There was strong opposition to the proposed site allocation including a petition signed by 1,047 people. There was concern over the loss of green space and amenity, with many considering the site to have long-standing recreational and cultural value particularly as a community asset. Many of the responses in objection believed that new development should not happen at the expense of green or open space, and instead this should be allocated to different sites. There was also some concern over the development's impact on air quality due to increased traffic, and challenging access.</p> <p><i>Comments in support (27):</i> There was strong support for the proposed allocation. This included several people who have claimed to be involved in the club for many years. There was support on the basis that an alternative cricket ground and facilities are present in the Stapleton area. Comments also stated that allocation of the plan will not only deliver housing for Bristol residents but also allow the development of a new ground and facilities for the club, and sustain cricket in Stapleton for years to come. Some comments also stated that the existing facilities are no longer fit for purpose and hence support the proposed allocation.</p> <p><i>Comments neither in support nor objection (4):</i> Three respondents stated that if the site is developed, then new replacement facilities should be provided. These respondents included Sport England.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (1):</i> One respondent was concerned about a notable oak tree on the boundary, which was registered on the Ancient Tree Inventory.</p>	2, 10, 15, 17, 28, 39, 55, 60, 74, 75, 77, 78, 84, 95, 107, 118, 119, 121, 127, 132, 137, 138, 141, 143, 153, 155, 162, 163, 174, 175, 183, 186, 187, 189, 190, 198, 200, 201, 225, 229, 232, 233, 235, 236, 245, 259, 294, 378, 425, 440, 442, 527, 625, 630, 651, 662, 797, 902, 914, 917
	BDA1302 Land south of Rose Green Close	<p>A total of three respondents made a number of comments regarding this site.</p> <p><u>Proposed Allocation</u> <i>Comments in objection (1):</i> One respondent objected to the allocation, stating that the area lacks the sufficient infrastructure to cope with 50 additional homes. The response also suggested that the development would encroach on the space next to the local cricket club and not enhance its use for the local community. Furthermore, a concern was raised that the site is an important local green space.</p>	253, 304, 442

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

Area	Draft Site Allocation	Comments	Respondent reference(s)
		<p><i>Comments neither in support nor objection (1):</i> Sport England recommended that the site is protected for sporting use as established within the adopted Playing Pitch Strategy. It was considered that this represented an important site for cricket and football, and has had a recent FA Pitch Improvement visit. If it is developed for housing, then the allocation needs to give clarity on a significant obligation towards pitch improvements and ancillary facilities. Sport England requested that Bristol City Council either confirm deletion of the allocation or give greater clarity on the developer obligations.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (1):</i> One comment raised concern that the site is in the vicinity of the planned city centre to East Fringe mass transit route and requested that consideration is given to the possibility of underground rail tunnel works and a station.</p>	
	BDA1303 Land at Hendys Yard, Lower Grove Road	<p>One respondent made one comment regarding this site.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (1):</i> One comment raised concern that the site is in the vicinity of the planned City Centre to East Fringe mass transit route and requested that consideration is given to the possibility of underground rail tunnel works and a station.</p>	253
	BDA1304 Land to the rear of Rose Green Road	<p>A total of seven respondents made a number of comments regarding this site.</p> <p><u>Proposed Allocation</u> <i>Comments in Support (7):</i> All comments were in support of the development and suggested that the site is specifically allocated for community-led housing. Two of the comments also suggested custom housebuilding.</p>	698, 729, 747, 748, 751, 789, 904
Filwood	BDA1401 Land at Hartcliffe Way	<p>A total of three respondents made a number of comments regarding this site.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (3):</i> The Environment Agency (EA) stated that the site in close proximity to the Main River Malago and 8 metre maintenance access will be required.</p> <p>In relation to transport, one comment raised concern that the site is in the vicinity of the planned city centre to Bristol Airport mass transit route and requested that consideration is given to the possibility of underground rail tunnel works and a station. One respondent was concerned that if these sites are to be developed public transport must be ensured; including the Metrobus M1 service to serve this part of the Hartcliffe Way to ease pressure on existing services. Furthermore, the comment requested mixed use, including shops/commercial outlets as part of BDA1401 due to low level of shops in the locality and opportunity to encourage cohesive future community. It was suggested that these uses should not encroach on any further green space or use additional sites.</p>	194, 253, 964
	BDA1402 Land at Nover's Hill	<p>A total of three respondents made a number of comments regarding this site.</p> <p><u>Proposed Allocation</u> <i>Comments in Support (1):</i> One comment was in support of the proposed allocation. While this land does not host existing employment operations, the land is narrow and has comparatively poor-quality access for HGVs which has raised significant</p>	194, 833, 964

Area	Draft Site Allocation	Comments	Respondent reference(s)
		<p>limitations regarding the value of this land for industrial/warehousing operations. The comment also suggested that the allocation of the site would have a series of benefits, including: reducing potential for conflict with commercial uses to the northern boundary; providing opportunity for an alternative access and more efficient development (given the site constraints necessitating an access road with no built form alongside); and providing an opportunity for site aggregation for any developer for a more logical/efficient development parcel overall.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (2):</i> The Environment Agency (EA) stated that the site is in close proximity to the Main River Malago and 8 metre maintenance access will be required.</p> <p>One respondent was concerned that if these sites are to be developed, public transport must be ensured; including the Metrobus M1 service to serve this part of the Hartcliffe Way to ease pressure on existing services. Furthermore, the comment requested mixed use, including shops/commercial outlets as part of BDA1401 due to low level of shops in the locality and opportunity to encourage cohesive future community. It was suggested that these uses should not encroach on any further green space or use additional sites.</p>	
	BDA1403 Land at Bedminster Road/Highbury Road	<p>One respondent made one comment regarding this site.</p> <p><u>Proposed Allocation</u> <i>Comments in objection (1)</i> The Environment Agency (EA) stated that a small part of the site is within Flood Zone 2 and requested this be removed from the allocation. The EA would be looking for Sequential layout of the site from the developer who would need to locate buildings in Flood Zone 1.</p>	964
Frome Vale	BDA1501 Land at College Road Fishponds	<p>A total of 114 respondents made a number of comments regarding this site.</p> <p><u>Proposed Allocation</u> <i>Comments in objection (109):</i> There was strong opposition to development on site including a petition with 446 signatures. Objection was strongly rooted in the loss of green space with many respondents mentioning that the area is valued by the local community for recreational and wildlife purposes. Many comments also mentioned the presence of a horse on site which is 'very important' for the community and provides both recreational benefits and sense of wellbeing to the community.</p> <p><i>Comments in support (4):</i> Four comments supported the allocation for community-led housing and stated that other than the horse on the site, there is no community or ecological amenity to the site. It was suggested that the allocation wording is amended to allow for custom house building, community led housing or self-build development.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (1):</i> One comment stated that the development of the site, a local open space, without compensatory open space or tree planting is contrary to goals of One City plan and commitments to increase canopy cover.</p>	13, 14, 21, 23, 31, 32, 34, 41, 51, 53, 65, 71, 73, 82, 86, 87, 93, 96, 99, 102, 105, 108, 109, 110, 115, 124, 125, 126, 132, 144, 145, 147, 148, 156, 157, 158, 160, 161, 173, 176, 178, 179, 185, 188, 191, 197, 199, 202, 203, 204, 205, 211, 221, 230, 241, 250,

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

Area	Draft Site Allocation	Comments	Respondent reference(s)
			256, 257, 263, 266, 271, 274, 276, 279, 281, 287, 304, 308, 355, 363, 365, 368, 369, 377, 382, 386, 395, 407, 411, 431, 445, 448, 449, 505, 529, 544, 550, 565, 570, 577, 592, 593, 605, 606, 613, 634, 673, 674, 679, 684, 699, 703, 713, 718, 720, 747, 748, 754, 764, 767, 779, 800, 909, 962
Hengrove and Whitchurch Park	BDA1801 Hengrove Leisure Park	<p>A total of four respondents made a number of comments regarding this site.</p> <p><u>Proposed Allocation</u> <i>Comments in objection (1):</i> One objection was raised to the development of the site for housing which suggested that this is site is an ideal location for a new town centre, of which residential could form a part.</p> <p><i>Comments in support (1):</i> One respondent was in support of the mixed-use designation for residential, flexible workspace and existing leisure uses.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (3):</i> One comment requested that policy should explicitly state that any development would be guided by the Neighbourhood Plan and that current leisure uses must be retained. One comment raised concern that the site is in the vicinity of the planned city centre to Bristol Airport mass transit route and requested that consideration is given to the possibility of underground rail tunnel works and a station. One comment stated that development details need to emphasise maintaining and strengthening links to Hengrove Park, the Children's Play area and The Mounds, and provide a direct link to the path by the Poplars and recreational routes proposed for the Park generally.</p>	253, 629, 655, 873

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

Area	Draft Site Allocation	Comments	Respondent reference(s)
	BDA1802 Land at Western Drive	<p>A total of two respondents made a number of comments regarding this site.</p> <p><u>Proposed Allocation</u> <i>Comments in objection (1):</i> One comment objected, stating that this allocation would result in a loss of part of the Hengrove Park Wildlife Network and argued that there is no opportunity to reasonably mitigate this impact. It was requested that this site be removed as an allocation.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (1):</i> One respondent stated that woodland on this site and the associated biodiversity should be partially retained, and opportunities should be explored for linking the site into the adjacent woodland area in Hengrove Park. The respondent was concerned that allocating site for industry was not consistent with other policies in the Local Plan requiring the improvement and retention of wildlife.</p>	629, 655
Hotwells and Harbourside	BDA2101 94-96 & 119 Cumberland Road	<p>One respondent made one comment regarding this site.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (1):</i> The Environment Agency (EA) stated that that this site relates to Future Flood Zone 3, and development would be acceptable with a suitable flood risk management strategy for its lifetime. Issues with Chocolate Path stability on the other side of the road must be addressed prior to development.</p>	964
Knowle	BDA2201 Broadwalk Shopping Centre	<p>One respondent made one comment regarding this site.</p> <p><u>Proposed Allocation and draft development considerations:</u> <i>Comments in support (1):</i> The owner of the site supports this allocation and fully supports the requirement for a masterplan-led approach to development capacity.</p>	819
Lockleaze	BDA2401 Bridge Farm, Land at South Hayes	<p>A total of seven respondents made a number of comments regarding this site.</p> <p><u>Proposed Allocation</u> <i>Comments in objection (1):</i> One objection to the development of the site requested that the site be reconsidered for open space. <i>Comments in support (5):</i> Comments supported this allocation and two suggested the development be implemented in a low-impact and environmentally sensitive manner. Three comments suggested this site be allocated specifically for community-led housing.</p> <p><u>Draft development considerations</u> <i>Comments neither in support nor objection (1):</i> One comment suggested that the site should provide 50 100% affordable homes.</p> <p><u>Estimated Capacity (35):</u> <i>Comments in support (1):</i> One comment was in support of the estimated allocated capacity</p>	112, 218, 304, 682, 842, 895, 904

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

Area	Draft Site Allocation	Comments	Respondent reference(s)
	BDA2402 Land to the east of Romney Avenue and Stanfield Close	A total of eight respondents made a number of comments regarding this site. <u>Proposed Allocation</u> <i>Comments neither in support nor objection (8):</i> All comments suggested that the site be allocated for community-led housing.	698, 729, 747, 748, 751, 789, 842, 904
	BDA2403 Former Gas Holder Site, Glenfrome Road	A total of five respondents made a number of comments regarding this site. <u>Proposed Allocation</u> <i>Comments neither in support nor objection (5):</i> All comments suggested that the site be allocated for community-led housing.	698, 729, 751, 789, 904
Redland	BDA2501 Land south of Zetland Road	One respondent made one comment regarding this site. <u>Proposed Allocation</u> <i>Comments neither in support nor objection (1):</i> One respondent considered the site to have invaluable commercial use which caters for local residents and requested that additional small workshop spaces or a convenient health care facility location is provided.	776
	BDA2502 Land at Cossins Road	A total of eight respondents made a number of comments regarding this site. <u>Proposed Allocation</u> <i>Comments neither in support nor objection (6):</i> All respondents requested that site be allocated for community-led housing. <i>Comments in support (1):</i> One comment in support suggested that the site is ideal for residential development and suggested that sloping land could be used to advantage to reduce apparent height while giving views across Redland Green.	698, 729, 747, 748, 751, 776, 789, 904
St George Central	BDA2601 Land at Two Mile Hill Road / Charlton Road	One respondent made one comment regarding this site. <u>Draft Development Considerations</u> <i>Comments neither in support nor objection (1):</i> One comment raised concern that the site is in the vicinity of the planned city centre to East Fringe mass transit route and requested that consideration is given to the possibility of underground rail tunnel works and a station.	253
	BDA2602 81-83 Two Mile Hill Road	One respondent made one comment regarding this site. <u>Draft Development Considerations</u> <i>Comments neither in support nor objection (1):</i> One comment raised concern that the site is in the vicinity of the planned city centre to East Fringe mass transit route and requested that consideration is given to the possibility of underground rail tunnel works and a station.	253

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

Area	Draft Site Allocation	Comments	Respondent reference(s)
	BDA2603 Land at Two Mile Hill Road / Waters Road	One respondent made one comment regarding this site. <u>Draft Development Considerations</u> <i>Comments neither in support nor objection (1):</i> One comment raised concern that the site is in the vicinity of the planned city centre to East Fringe mass transit route and requested that consideration is given to the possibility of underground rail tunnel works and a station.	253
St George Trooper's Hill	BDA2701 Land at Crew's Hole Road	A total of four respondents made a number of comments regarding this site. <u>Proposed Allocation</u> <i>Comments in objection (1):</i> The Environment Agency (EA) object to the development in this location. The site is located in present day Fluvial and Tidal Flood Zone 3 and with climate change, flood levels and depths would increase further. As it is located on the banks of the Main River Avon, an 8-metre set back distance would be required from the brink of the bank. <i>Comments in Support (2):</i> Two comments supported the allocation of this site with one suggesting that any development should retain the character of the Avon Valley Conservation Area. Two comments also stated that traffic calming measures should be introduced while also accommodating pedestrians and cyclists. There was also some concern regarding the lack of public transport provision. <i>Comments neither in support nor objection (1):</i> One respondent was concerned that site allocation will result in increased rents and force businesses out. also concerned about impacts on Beehive Trading Estate which are small specialist businesses part of local community. The respondent also suggested the prohibition of high walls on the riverside boundary to prevent graffiti.	8, 416, 814, 964
	BDA2702 Land at corner of Bryant's Hill and Furber Road	One respondent made one comment regarding this site. <u>Proposed Allocation</u> <i>Comments in support (1):</i> One comment supported this site allocation	416
	BDA2703 Land at Nags Head Hill	One respondent made one comment regarding this site. <u>Proposed Allocation</u> <i>Comments in support (1):</i> One comment supported this site allocation.	416
St George West	BDA2801 Land to the south of Blackswarth Road	A total of four respondents made a number of comments regarding this site. <u>Proposed Allocation</u> <i>Comments in Support (3):</i> Two comments supported the allocation of this site with one suggesting that any development should retain the character of the Avon Valley Conservation Area. Two comments also stated that traffic calming measures should be introduced while also accommodating pedestrians and cyclists. There was also some concern regarding the lack of public transport provision. One comment supported the designation, stating that the landowner is committed to delivery however the respondent questioned the viability of delivering mixed-use on this site.	8, 491, 814, 964

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

Area	Draft Site Allocation	Comments	Respondent reference(s)
		<p><i>Comments neither in support nor objection (1):</i> The Environment Agency (EA) stated that this site relates to Future Flood Zone 3 and is in proximity to the Main River Avon. An 8-meter set back distance would be required from the brink of the bank.</p> <p><u>Draft Development Considerations</u> <i>Comments neither in support nor objection (2):</i> One respondent suggested boundary treatment to prevent graffiti. Another comment stated that BCC needs to consider that any non-residential uses should be proportionate.</p>	
Southmead	BDA2901 Land at Lanercost Road	<p>A total of 11 respondents made a number of comments regarding this site.</p> <p><u>Proposed Allocation</u></p> <ul style="list-style-type: none"> <i>Comments neither in support nor objection (8):</i> Seven comments requested that the site is allocated for community-led housing. One comment raised concern that the development site is a local open space and that without compensatory open space or tree planting, the development is contrary to goals of the One City Plan and the commitments to increase canopy cover. <i>Comments in support (1):</i> One comment supported this allocation. <i>Comments in objection (1):</i> One respondent suggested that the site allocation be reconsidered for open space. <p><u>Draft Development Considerations</u> <i>Comments neither in support nor objection (1):</i> One comment raised concern that the site is in the vicinity of the planned City Centre to North Fringe mass transit route and requested that consideration is given to the possibility of underground rail tunnel works and a station.</p>	253, 304, 698, 724, 729, 747, 748, 751, 789, 904, 909
	BDA2902 Works at Felstead Road	<p>A total of two respondents made a number of comments regarding this site.</p> <p><u>Proposed Allocation</u> <i>Comments in support (1):</i> One comment supported this allocation.</p> <p><u>Draft Development Considerations</u> <i>Comments neither in support nor objection (1):</i> One comment raised concern that the site is in the vicinity of the planned City Centre to North Fringe mass transit route and requested that consideration is given to the possibility of underground rail tunnel works and a station.</p>	253, 724
Southville	BDA3001 Land at North Street / Durnford Street	<p>One respondent made one comment regarding this site.</p> <p><u>Draft Development Considerations</u> <i>Comments neither in support nor objection (1):</i> One comment raised concern that the site is in the vicinity of the planned city centre to Bristol Airport mass transit route and requested that consideration is given to the possibility of underground rail tunnel works and a station.</p>	253

Area	Draft Site Allocation	Comments	Respondent reference(s)
Stockwood	BDA3101 Greville building, Lacey Road	<p>A total of six respondents made a number of comments regarding this site.</p> <p><u>Proposed Allocation</u> Comments neither in support nor objection (1): One comment expressed concern over lack of suitable access in potential breach of highway codes. It also raised concern about the impact on neighbours including elderly persons.</p> <p><i>Comments in objection (4):</i> Three comments objected to the allocation for social housing. Four respondents were also concerned about parking provision, rubbish, access and noise.</p> <p><u>Estimated Capacity of 32 homes</u> <i>Comments in objection (2)</i> Two comments suggested that the estimated capacity of 32 was excessive and that the area would be unable to accommodate such a capacity.</p>	402, 426, 444, 476, 581, 689
Stoke Bishop	BDA3201 Land at Sanctuary Gardens, Sneyd Park	<p>A total of nine respondents made a number of comments regarding this site.</p> <p><u>Proposed Allocation</u> <i>Comments neither in support nor objection (7):</i> Comments suggested that the site is allocated for community-led housing <i>Comments in objection (1):</i> One comment objected to the allocation in the conservation area.</p> <p><u>Estimated Capacity of 20 homes</u> <i>Comments in objection (2)</i> Two comments objected to the estimated capacity of 20 with one respondent suggested 5-6 homes would be a more suitable number.</p>	317, 698, 729, 747, 748, 751, 789, 904, 967
Windmill Hill	BDA3401 112 Bath Road	<p>One respondent made one comment regarding this site.</p> <p><u>Proposed Allocation</u> <i>Comments in support (1):</i> One respondent supported the suggestion that this site is suitable for residential accommodation.</p> <p><u>Estimated Capacity of 20 homes</u> <i>Comments in support (1)</i> One comment supported the capacity of 20 homes.</p>	316

Table 2 Comments raised against all Site Allocations and the Site Allocation process

Area	Draft Site Allocation	Comments	Respondent reference(s)
All	All	<p>Coal Authority: The Coal Authority support that sites proposed for allocation appear to have been assessed against the downloadable data, in respect of Surface Coal and Development Risk, and that these issues have been identified within the draft development considerations for those sites included in the document.</p> <p>Environment Agency: The draft development allocations are up to 2036, however there is a recognition that some of these may have already been allocated under the existing Local Plan to 2026. It was not clear which were the new sites so we have commented on all</p>	642 964

Area	Draft Site Allocation	Comments	Respondent reference(s)
		those listed. In the final document, it is requested that a grid reference and/or postcode be provided so it is easier for consultees to locate the sites.	
All	All	One comment considered that it was not possible to provide comments against each site, however, it was considered that when selecting sites for allocation, BCC should select the widest possible range of sites both by size and market location. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs	672
All	N/A	One comment stated that all venues and sites, including festival sites, should be delineated within the Local Plan using the site allocation process	778, 783
All	N/A	Two comments considered that the documents published in support of the Local Plan Review do not provide evidence for how sites have been identified and assessed, and therefore it is difficult to comment on the thoroughness of the assessment and whether reasonable alternatives have been considered. Availability of some of the sites identified is queried, many allocations only likely to come forward if current commercial operators move on and this is inappropriate as provides no confidence that they will come forward. Greater emphasis should be on deliverable and developable sites.	849, 888
All	N/A	One comment questioned how policy mechanisms in the revised Plan will be applied to the retained allocations.	890

Several comments were raised in relation to existing allocations:

Table 3 Existing allocations

Site	Comments	Respondent reference(s)
Glenside Campus (Ref BSA0502)	One comment was concerned that this allocation had not been taken forward in the Draft Development Allocations document, however the respondent was generally in support of the proposed allocation for 'housing with mixed use'.	488

Sites that received no direct comments:

Table 4 Draft site allocations which received no comments

Ward	Draft Site Allocation
Ashley	BDA0103 Land at Cheltenham Road / Bath Buildings
	BDA0105 Land to the rear of 64-68 Stokes Croft
Bedminster	BDA0307 155-169 West Street
Eastville	BDA1305 525 Stapleton Road
Hartcliffe and Withywood	BDA1601 Land to the rear of 96 Church Road/Orchard Drive
Henbury and Brentfr	BDA1701 Brentry/Wellhay Elderly People's home Knole Lane
	BDA1702 14 Wyck Beck Road
Hillfields	BDA1901 Land at the corner of Lodge Causeway/Berkeley Road
Horfield	BDA2001 3 Kelston Road
	BDA2002 272-276 and 290-298 Southmead Road
Lawrence Hill	BDA2301 Land to the south of Warwick Road / Oxford Place
	BDA2302 Former Barton Hill Nursery School, Queen Ann Road
St George Central	BDA2604 Land to the south east of Cousins Lane

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

	BDA2605 Land at Broad Road / Lodge Road
St George West	BDA2802 Part of Soaphouse Industrial Estate
	BDA2803 222-232 Church Road
Southville	BDA3002 1-7 Smyth Road

Appendix B: Bristol Local Plan Review New Protection for Open Space

Methodology: Summary table

The following document summarises the number of comments received on the New Protection for Open Space methodology, comments received in relation to existing defined Local Green Space and Reserved Open Space, and proposals for new designations across the City.

Table 1 Summary of comments received on the New Protection for Open Space methodology

Aspect of Methodology	Comments	Respondent reference(s)
Selection of input sites	<p><i>Comments in objection (2):</i> Two comments stated that, according to the NPPF, the designation of Local Green Space (LGS) is a tool available to local communities to apply to areas they deem to be of particular importance. As such, councils must ensure local communities are fully involved in this process and LGS designations reflect the particular importance of open spaces to those communities. The comments considered that the New Protection of Open Spaces document fails to make this clear or to highlight relevance of importance of open spaces to communities.</p> <p><i>Comments neither supported nor objection (4):</i> One comment suggested it is important to ensure the assessment allows for exceptional cases. One comment considered that the statement that 'all spaces need to demonstrate only one value' is confusing, and suggested it would be better to suggest that these do not need to demonstrate them all.</p> <p>One comment raised concern over the methodology utilised and the lack of access to individual site assessments, with third parties unable to review and evaluate the assessment. It was stated that the conclusion simply determines what 'type' of open space the new designations are. The assessment detailed against the Stage 2 criteria as set out in the methodology is not provided, nor is a summary for Reserved Open Space (ROS) sites.</p> <p>One respondent provided an appendix of 328 open spaces which could potentially be designated – the respondent stated it would have been helpful if this review had identified these and any other sites the Council is aware of, giving reasons why no designation has been made.</p>	169, 291, 592, 791, 805, 833, 909
Structure of document	<i>Comments in objection (1):</i> The comment stated that LGS and ROS should be listed in alphabetical order and that it is unclear why the Green Belt is not mapped on the ROS / LGS maps or why the map for Hengrove and Whitchurch Park has not been included.	883
Reserved Open Space: Assessment against Planning Practice Guidance / Clarity of Assessment:	<p><i>Comments in objection (1):</i> One comment stated that the methodology is unclear and the application of the method appears inconsistent and unsubstantiated.</p> <p><i>Comments neither supported nor objection (1):</i> Concerned only one community garden included despite being in typology of open space types - consider all should be, as well as all city farms</p>	646, 849

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

Reserved Open Space: Level of protection	<p><i>Comments in supported (1):</i> One comment expressed general supported for this revised policy approach that reflects guidance within the NPPF and moves away from inflexible policy approach of the current adopted green spaces policy</p> <p><i>Comments in objection (1):</i> One comment objected to the proposal that ROS should be treated as an exception site for the purposes of site development. The comment stated that this would undermine any protection to this class of open space and argued it must be removed.</p> <p><i>Comments neither supported nor objection (2):</i> One comment stated that section 3.22 implies all sites appraised were given a designation, however the respondent noted that some sites proposed for assessment were not included.</p> <p>One comment queried why 31 railway land sites have been designated as ROS, specifically noting that ROS12010, ROS12011 & ROS12012 appear to have been lost to new rail infrastructure. It was also noted that the last paragraph of the ROS policy text refers incorrectly to 'Local Green Space' (p.9).</p>	193, 646, 833, 909
Assessment against grouped open space types	<p><i>Comments in objection (3):</i> Concern was raised over allotments being classified as ROS as they meet some criteria of Local Green Space.</p> <p><i>Comments neither supported nor objection (1):</i> One comment stated that use of groupings of open space is a crude method of assessing individual sites. In reference to Town and Village Greens (TVG), the policy document stated "<i>this status precludes any use of the land other than for recreational enjoyment</i>". The respondent stated that this is legally incorrect as in fact a TVG can be used for other uses provided it does not prevent the public from using the land in the same way which justified its registration as a TVG in the first place.</p>	36, 169, 358, 607, 635, 636
Summary of conclusions	<p><i>Comments neither supported nor objection (2):</i> One comment considered that is unclear why there is no reference to local green space within the Western Harbour area.</p> <p>One comment noted that the NPPF designation status of LGS and comparison to Green Belt, and considered that LGS should be viewed as the exception rather than the norm. While recognising that many proposed LGS will be important to local communities for informal recreational uses and may also contain varying levels of wildlife, beauty and tranquillity, the respondent considered that it is not evident that all proposed LGS are "special" and of "particular local significance" to distinguish them from other green open spaces to reach the high bar necessary for LGS designation.</p>	603, 672

Specific designations for LGS: Summary Table

Table 2 Summary of comments received for proposed Local Green Space designation

Site Reference	Site Name	Number of responses received	Summary of comments	Respondent reference(s)
LGS27003	New Cut Local Nature Reserve	1	Comment stated that protection only covers as far as Greenbank Road, East to West. The comment argued that the cut banks should be protected through to where they join the Avon proper, forcing any proposals at Payne's shipyard and/or Thomas Ware's tannery to respect this rather than incorporate it into waterfront development	446
LGS07003	Nightingale Valley	1	Wessex Water requested the removal of their assets from the site boundary.	709
LGS02004	Nibley Road Open Space and Lamplighter's Open Space	2	Comments supported LGS designation and ask for 'recreational' and 'tranquillity' values to be included in the matrix.	100, 116
LGS29004	Troopers Hill Nature Reserve	14	Comments demonstrated strong support for LGS designation, expressing the importance of the site for the community. Comments expressed that the area is highly valued for its green space, historical significance, and wildlife.	1, 8, 9, 114, 131, 139, 222, 359, 705, 710, 711, 736, 813, 835
LGS28003	Troopers Hill Field	16	Comments demonstrated strong support for LGS designation expressing the importance of the site for the community. Comments expressed that the area is highly valued for its open space, tranquillity, and use for recreation.	1, 8, 9, 114, 128, 131, 139, 222, 359, 705, 710, 711, 736, 813, 835, 909
LGS29001	Crews Hole Road Open Space	13	Comments demonstrated strong support for LGS designation stating that the site meets LGS values. Some comments asked to also acknowledge the space's recreational value due to its popular footpaths.	1, 8, 9, 114, 131, 222, 359, 705, 710, 711, 736, 813, 835
LGS05006	Manor Woods Valley	3	Comments welcomed LGS designation with one comment requesting to acknowledge the site's historical significance in the criteria.	3, 502, 770
LGS13003	Eastville Park	4	Comments requested the recognition of the park's richness of wildlife; stating the presence of a wide array of wildlife. Wessex Water requested the removal of their assets from the site boundary.	5, 154, 254, 709
LGS26001	Badocks Wood	12	Comments supported LGS designation for the site. Some comments requested the inclusion of Westbury Wildlife Park as part of the site designated.	62, 152, 326, 384, 385, 389, 404, 554, 568, 808, 897, 954
LGS26002	Doncaster Road Park	9	Comments supported LGS designation	62, 152, 326, 384, 385, 554, 568, 724, 897
LGS26003	Henleaze Lake	7	Comments supported LGS designation	62, 152, 384, 385, 554, 568, 897
LGS16008	Willmott Park (south Fulford Rd)	1	Comments supported LGS designation, however requested that these designations should fulfil all LGS criteria.	883

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

LGS16005	Valley Walk (south of Hareclive Rd)	1	Comments supported LGS designation, however requested that these designations should fulfil all LGS criteria.	883
LGS16004	Valley Walk (north of Fulford Rd)	1	Comments supported LGS designation, however requested that these designations should fulfil all LGS criteria.	883
LGS16003	Valley Walk (north of Hareclive Rd)	1	Comments supported LGS designation, however requested that these designations should fulfil all LGS criteria.	883
LGS01011	St Werburgh's City Farm	3	Comments support the LGS designation. Wessex Water stated that the space was actually two parts: the upper part is defined as 'The Church Field' (which is part of the Narrowways Millennium Green and Narrowways Local Nature Reserve'. The lower part is St Werburgh's City Farm Community Gardens which is leased from Narrowways Millennium Green but is also part of Narrowways Local Nature Reserve. One comment supported designation of both sections as Local Green Space.	18, 100, 116
LGS02003	Lamplighter's Marsh Local Nature Reserve	1	Comments in support of the LGS designation on the site. Wessex Water stated that the proposed Local Green Space (LGS) designation (LGS02003 Lamplighter's Marsh Local Nature Reserve) surrounds the existing Wessex Water Sewage Pumping Station (SPS) (Site ID 14018 Glen Avon Sludge Quay SPS 352360, 176540). Concern was raised that while the SPS footprint is excluded from the designation, no allowance is made for possible future expansion/works if required. It was requested that the proposed boundaries are amended to remove WW assets and to include the footprint of the asset and the immediate surrounding area to permit any future works and possible expansion.	100, 116, 709
LGS02009	The Daisy Field	2	Comments supported the LGS designation and stated that the site is part of the designated Lamplighter's Local Nature Reserve (LGS02003) and not a separate entity. Comments also requested to include historic significance and recreational value in the assessment matrix as the space includes the World War 1 Remount Centre. One comment also stated that the site is not considered to be suitable for development.	100, 116
LGS16001	Highridge Common	1	Comment requested the recognition of the wildlife value of the site.	206
LGS01010	St Andrew's Park	1	Comment in support of LGS designation, with comments suggesting plans to improve the richness of wildlife within the area.	249
LGS13010	Wickham Glen Open Space	2	One comment suggested the addition of historical significance to the site values. Another comment objected to the LGS designation and stated that the owner of the land would like to develop a community-led housing project which seeks to protect the ecological value. The comment argued that LGS designation may prevent positive development of the land.	254, 789

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

LGS34004	Sheep Wood	2	Comments requested that Sheep Wood (LGS33004), 'Former Wesley College' (ROS33011) and the meadow that these join on three sides is combined to be one single Local Green Space. Comments considered that the site held historic value due to historic importance of the Wesley College and John Wesley in Bristol during foundation of Methodist branch of Christianity. It is also a haven for natural wildlife giving great value	272, 758
LGS17004	Fields above Lawrence Weston Moor	2	Comment argued that the proposed designation is unsound and based on an inaccurate assessment of an extensive tract of land. It stated that overall it is inaccurate to describe proposed LGS 17004 as 'fields', as most of it is woodland set on sloping terrain. This comment considered that the wooded slopes of Hallen and Moorgrove Wood may meet the criteria of 'beauty and tranquility', and 'richness of wildlife', as required by NPPF, however the smaller section of proposed LGS 17004 (the land adjoining Wood Road and Kings Weston Road) does not due to busy Kings Weston Road and Woodgrove Road. Comment that this parcel of land is heavily grazed, is hedged only at its perimeter, and is noted for its lack of trees. Wessex Water requested the removal of their assets from the site boundary.	314, 709
LGS05001	Bedminster Down Common	3	One comment supported the LGS designation. One comment objected to the designation as it may stop future development. One comment requested that the community has input into defining the boundaries of the protected site and requested that the adjoining areas be earmarked for possible development.	383, 793, 844
LGS05002	Bedminster Down Common	4	One comment supported the LGS designation. One comment objected to the designation as it may stop future development. One comment requested that the community has input into defining the boundaries of the protected site and requested that the adjoining areas be earmarked for possible development. Wessex Water requested the removal of their assets from the site boundary	383, 709, 793, 844
n/a (multiple sites)	Westbury-on-Trym and Henleaze	1	Comment supported LGS designation	385
LGS32010	Trymside Open Space	5	Comments supported LGS designation and hopes it would protect wildlife. Wessex Water requested the removal of their assets from the site boundary	177, 389, 709, 808, 897
LGS32008	Sylvan Way Open Space	1	Comment supported LGS designation	389
LGS32002	Coombe Hill Golf Course	2	Comments supported of LGS designation with one comment highlighting the importance of wildlife	389, 808
LGS30001	St George Park	2	Comment in support of LGS designation.	518, 709

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

			Wessex Water requested the removal of their assets from the site boundary	
LGS10001	Arlington Villas Park	2	Two comments were in support of LGS designation	428, 907
LGS10002	Easter Gardens	1	One comment in support of LGS designation	907
LGS12001	Netham Park	1	The comment implied support of LGS designation, as the respondent commented that the open space meets recreational, wildlife and tranquillity LGS criteria.	530
LGS15008	Stoke Park Estate and Duchess Way Open Space	1	One comment in support of LGS designation	895
LGS24006	Stoke Park Estate	1	One comment in support of the LGS designation, however unclear why specific parts of the site have been designated as LGS whereas others are designated as ROS.	880
LGS24004	Lockleaze open Space	1	One comment in support of LGS designation	895
LGS03001	Ashton Fields	1	Comment in support of LGS designation of Ashton Fields, stating that this open space also demonstrates "Historical Significance", "Tranquillity" and "Richness of Wildlife". It was stated that the site has recorded significance in its conservation status as an SNCI (Site of Nature Conservation Interest) and is a recognised Wildlife Network Site. Comment that the site contains several BAP priority habitats and species of significance.	585
LGS27002	Greville Smyth Park	1	Comment stated that designation appears to remove status from northern parts of Greville Smyth Park and Dame Sylvia Crowe landscaped area	446
LGS32009	The Downs	1	Wessex Water requested the removal of their assets from the site boundary	709
LGS34004	Victoria Park	1	Wessex Water comment that there is an existing CSO within the proposed green space (Hill Avenue/St Lukes Road CSO).	709
LGS22003	The Bommie - Wedmore Vale	1	Comment expressed support for the designation of the site as an LGS but asked for the values table to be updated to demonstrate that it is both a recreational and historical site.	623
LGS14001	Glyn Vale	1	Comment in support of the designation of the site as an LGS but asked for the values table to be updated to demonstrate that it is a historical site.	623
LGS14002	Kingswear and Torpoint Open Space	1	Comment in support of the designation of the site as an LGS but asked for the values table to be updated to demonstrate that it is a historic site.	623
LGS29003	Northern part of Conham Vale and Dundridge Farm Woodland SNCI	1	Comment stated that Dundridge Park is much loved for sport, recreation, children's play, dog walking and picnics and general beauty.	745
LGS32006	Sea Mills Harbour	1	Comment in support of LGS as part of Trym river corridor and wildlife corridor, which requires strong protection.	808
LGS32002	Clack Mills Open Space	1	Comment in support of LGS as part of Trym river corridor and wildlife corridor, which requires strong protection.	808
LGS17001	Blaise Estate	1	Comment in support of LGS as part of Trym river corridor and wildlife corridor, which requires strong protection.	808

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

LGS17003	Crow Lane Open Space	1	Comment in support of LGS as part of Trym river corridor and wildlife corridor, which requires strong protection.	808
----------	----------------------	---	---	-----

Specific designations for ROS: Summary Table

Table 3 Summary of comments received for each proposed Reserved Open Space designation

Site Reference	Site Name	Number of responses received	Summary of comments	Respondent reference(s)
ROS32010	Stoke Lodge	203	<p>Most comments requested that the site be designated as LGS with many stating that it is the only open space to many in the community and that it satisfies many, if not all, LGS criteria. Many respondents gave personal accounts of their enjoyment of Stoke Lodge and its value to the community, with reference to the LGS criteria. Reference was made to both Town and Village Green applications that have been made for the site, as well as the levels of community participation in campaigning for the protection of the site.</p> <p>Some comments expressed concern that an ROS designation would not provide sufficient protection from development, while some comments expressed concern over the reduced access due to the erection of a fence by Cotham School. A petition was received for the designation of Stoke Lodge as an area of Local Green Space, which was signed by 1,574 people.</p> <p>Some comments called for the rejection of the petition to change the designation to LGS as that would restrict the ability of Cotham School to provide appropriate sports provision for children and would be inconsistent with other ROS designations for school playing fields. It was stated that the site is not a Town and Village Green and therefore should not be an LGS. It was also stated that an LGS designation may breach the terms of the lease of the fields to Cotham School by Bristol City Council.</p>	<p>22, 24, 25, 26, 27, 29, 30, 33, 35, 42, 43, 44, 54, 57, 58, 59, 61, 63, 68, 69, 70, 80, 81, 88, 90, 91, 94, 97, 98, 113, 130, 136, 140, 146, 149, 150, 151, 159, 167, 168, 169, 170, 171, 172, 180, 182, 184, 195, 207, 208, 209, 210, 212, 213, 214, 219, 220, 224, 227, 231, 234, 238, 239, 240, 247, 248, 251, 258, 261, 262, 267, 269, 270, 277, 278, 282, 285, 290, 291, 301, 302, 317, 326, 327, 328, 339, 342, 343, 348, 351, 362, 370, 376, 381, 385, 399, 419, 430, 436, 450, 458, 477, 480, 482, 483, 485, 489, 493, 494, 495, 496, 497, 500, 501, 503, 508, 510, 516, 517, 519, 520, 522, 523, 525, 526, 528, 536, 538, 539, 540, 542, 543, 545, 547, 548, 549, 552, 553, 555, 556, 559, 560, 562, 566, 567,</p>

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

				574, 575, 578, 579, 589, 595, 597, 599, 602, 604, 612, 659, 665, 668, 669, 677, 678, 680, 681, 685, 690, 692, 693, 695, 701, 726, 732, 734, 735, 737, 738, 740, 741, 742, 750, 755, 757, 762, 763, 765, 768, 780, 781, 785, 809, 810, 850, 860, 897, 919, 920, 921, 924, 925, 954, 955, 967
ROS09011	Land at Windsor Place and The Paragon	1	Comment stated that site should be an LGS.	704
ROS01011	St Werburgh's Park Open Space	2	Comments suggested that site should be an LGS as they consider that the site satisfies some of the LGS criteria (notably amenity, tranquillity and wildlife values).	36, 72
ROS20005	Land at Maskelyne Avenue	1	Comment stated that site should be an LGS.	152
ROS09013	Land to the south of Cornwallis Crescent	1	Comment stated that site should be an LGS.	704
ROS26011	Trym Valley Open Space, Southmead	10	Comments mostly requested the site (and adjacent sites) be designated as an LGS due to its important role in the River Trym wildlife corridor. One comment stated that the open space does provide important wildlife corridor from Badock's Wood. One comment requested that some of area be earmarked for future small community-led housing There was one comment which objected to ROS designation stating that the site is underused and has no passive surveillance from adjacent housing; which has led to vandalism and fly-tipping.	62, 152, 326, 383, 385, 388, 554, 568, 724, 808
ROS05010	May and Hasell playing fields	2	Tw comments were concerned regarding the designation of ROS on the site, suggesting that this should be LGS on the basis that the site is vulnerable for surrounding Green Belt development.	383, 590
ROS24021	Railway line north of Lockleaze Road	1	Comment stated that Lockleaze Community Orchard is located at the Lockleaze Road end of this site. It should be recognised and protected by the plan as it is an important community asset	52
ROS05004	Crox Bottom Green Space	7	Comments requested that the site should be designated as an LGS and that the space possesses recreational value, richness of wildlife and as a place of beauty and tranquillity. Several comments directed plan-makers to the Management Plans for the site, stating that it is a Local Nature Reserve.	3, 502, 532, 623, 770, 793, 883

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

ROS13008	Colston School	1	The comment requested that the space known as 'Colston's Fields' should be detached from the school and granted LGS status. A significant part of this field was granted Town and Village Green status in 2017.	66
ROS01003	Land to the rear of The Garden, Mina Road	1	The comment supported the designation of space as ROS due to its use for Forest School education.	18
ROS14001	Brixham Road Open Space	2	Comments stated that this space should be designated as LGS, as it demonstrated the values of LGS.	92, 623
ROS20002	Dorian Road Playing Fields	1	Comment stated that site should be an LGS.	152
ROS20003	Grittleton Road Allotments	1	Comment stated that site should be an LGS.	152
ROS24007	Fairfield School Playing Field, Muller Road	1	Comment stated that this site, amongst the other which form part of the 'Green Finger' between Montpelier and Purdown, should be designated as an LGS.	193
ROS24024	Sir Johns Lane Allotments	2	Comment stated that this site, amongst the other which form part of the 'Green Finger' between Montpelier and Purdown, should be designated as an LGS. One comment considered that inappropriate development here could impact on Stoke Park.	193, 895
ROS24012	Land at Boiling Wells	3	Comments stated that this site, amongst the other which form part of the 'Green Finger' between Montpelier and Purdown, should be designated as an LGS. One comment objected stating that the site is already protected in current Local Plan under BCS9 and DM17, therefore no justification for additional layer of protection through LGS. It stated that the site has no significant beauty and no evidence to justify designation on this criterion	193, 439, 492
ROS24011	Land at Boiling Wells	3	Comments stated that this site, amongst the other which form part of the 'Green Finger' between Montpelier and Purdown, should be designated as an LGS. One comment objected stating that the site is already protected in current Local Plan under BCS9 and DM17, therefore no justification for additional layer of protection through RGS. It stated that the site has no significant beauty and no evidence to justify designation on this criterion.	193, 439, 492
ROS24019	Railway from Easton Road to Muller Road and Ashley Hill	2	Comments stated that this site, amongst the other which form part of the 'Green Finger' between Montpelier and Purdown, should be designated as an LGS. Wessex Water requested the removal of their assets from the site boundary	193, 709
ROS01001	Ashley Vale Allotments	1	Comment stated that this site, amongst the other which form part of the 'Green Finger' between Montpelier and Purdown, should be designated as an LGS.	193
ROS14005	Hilltop Farm Novers Hill	3	One comment requested that the site be an LGS. Two comments supported the designation, but stated that the extent should be larger to include the meadow beyond the woods and east up to Novers Lane (known as the Western Slopes). This complements the woodland and scores highly on all 5 values - respondent provides a justification for each criterion.	194, 265, 623

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

ROS03017	White City Allotments	2	Both comments supported the designation, with one stating that they hoped that development at Western Harbour wouldn't affect White City Allotments as they are used to grow food locally, get fresh air, exercise.	217, 390
ROS12001	Albion Road Amenity Area	3	Comments stated that site should be an LGS.	242, 268, 807
ROS12003	Belle Vue Road Open Space	4	Comments stated that site should be an LGS.	242, 268, 807, 811
ROS13010	Grove Road Open Space	1	Comment supported inclusion of area locally known as 'Meadowsweet open space' which respondent believes is within ROS13010 Grove Road Open Space. They stated it is used regularly for recreation and provides beauty and views over city and has recently had 600 young trees planted. Home to lots of wildlife. If not included in this allocation, then the respondent stated it should be.	254
ROS34011	Playground at School Road, Totterdown	17	Strong support expressed for site protection, with most comments stating that that site should be an LGS due to its value to the community. One comment strongly supported ROS designation, citing important views with relaxing spaces.	316, 325, 330, 331, 333, 334, 336, 346, 364, 366, 375, 400, 408, 438, 580, 686, 751
ROS33011	Former Wesley College	6	Most comments stated that the area is of historical significance and should be jointly designated an LGS with Sheep Wood (LGS33004) and a meadow that is bordered on three sides by the two sites. The comments stated that this is a single area and makes important contribution to Westbury on Trym through heritage and wildlife value.	272, 326, 394, 612, 758, 864
ROS01004	Lynmouth Road Allotments	4	Comments stated that site should be an LGS.	18, 358, 359, 473
ROS10001	Open Space at Eaton Crescent	3	One comment supported ROS designation while the other two requested that it is changed to LGS	409, 428, 907
ROS12004	Bristol and Bath Railway Path	7	Comments requested that the site be designated an LGS based on the basis that it satisfies LGS criteria.	371, 397, 398, 506, 557, 612, 807
ROS12005	Bristol and Bath Railway Path adjacent to Owen Square Park	6	Comments requested that the site be designated an LGS based on the basis that it satisfies LGS criteria.	371, 397, 398, 506, 557, 807
ROS03001	Alderman Moores Allotments	1	Supported with no further comment	390
ROS32002	Highway Land Portway	1	Comment provided that this space should be considered as wildlife corridors and given Local Green Space designation.	389
ROS32003	Portway - land between Railway and River	1	Comment provided that this space should be considered as wildlife corridors and given Local Green Space designation.	389

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

ROS26003	Filton Golf club	1	<p>Comment objected to inclusion of the land within Plot E within Reserved Open Space, for the following reasons:</p> <ul style="list-style-type: none"> - It was not included as open space on the Parks and Green Space Strategy typology mapping; - It is unclear why Plot E has been combined with the Filton Golf Club to the south as the character of the site differs substantially. - It has limited public value, nor as local townscape or was it utilised as a landscape feature. - Plot E does not fit into the categories listed in Table 2 - in respect of Open Space or Local Green Space. - There are other, better located ROS sites nearby. 	628
ROS13014	Land to the east of Barkleys Hill	1	<p>Comment objected and considered that this land has some potential for development to meet objectives of Local Plan and subject to provisions of para 97 of NPPF. The respondent considered that no evidence is provided to justify the land as ROS and that it is inconsistent that Stapleton Cricket Club 300m north of site is not a ROS despite being a sports field and is also an allocated site for development.</p>	849
ROS13016	Land to the west of Barkleys Hill	1	<p>Comment objected and considered that this land has some potential for development to meet objectives of Local Plan and subject to provisions of para 97 of NPPF. The respondent considered that no evidence is provided to justify the land as ROS and that it is inconsistent that Stapleton Cricket Club 300m north of site is not a ROS despite being a sports field and is also an allocated site for development.</p>	849
ROS10002	South Parade Gardens	2	<p>One comment supported protection while the other requested that the site be reclassified as LGS due to lack of open space in Clifton Down</p>	428, 907
ROS09019	Vyvyan Terrace	1	<p>The respondent queried why this is a Reserved Open Space, as it is a private garden, stating that this seems anomalous, when Royal York Gardens is not considered to be a ROS.</p>	704
ROS09015	Park Place	1	<p>Comment stated that site should be an LGS.</p>	704
ROS09005	Dowry Square	1	<p>Comment stated that site should be an LGS.</p>	704
ROS23027	The Urban Park	1	<p>Comment stated that site should be an LGS.</p>	807
ROS29007	Woodland at Crew's Hole Road	1	<p>Comment objected as site is not publicly assessable so should not be designated as open space. It stated that if the criteria for its designation is landscape and ecology, offering environmental and visual amenity value, this is unnecessary as there is already a policy base to protect trees, valued landscape and ecological resources. It is a privately owned, fenced off site with no access to anyone but the owners and therefore the respondent considered that the ROS designation is tantamount to Green Belt within the city. The respondent stated that any designation should be based on evidence to demonstrate particular local significance including to community.</p> <p>The respondent stated that while the steep gradient of site would prevent development of the upper slopes, limited development of lower slopes could offer valuable contribution to the housing</p>	825

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

			supply, employment stock and street scene.	
ROS24010	Land Adjoining Tackley Road Garage	1	Comment stated that site should be considered as part of the overall footprint of Stoke Park/Purdown LGS.	895
ROS04001	Ashley Down Allotments	1	Wessex Water requested the removal of their assets from the site boundary	709
ROS06009	Land at Wootton Road	1	Wessex Water requested the removal of their assets from the site boundary	709
ROS28001	Air Balloon Primary School	1	Wessex Water requested the removal of their assets from the site boundary	709
ROS31003	Hazelbury Road Open Space	1	Wessex Water requested the removal of their assets from the site boundary	709
ROS30001	Avon View Cemetery	1	Comment stated that site should be an LGS.	722
ROS26002	Elderberry Walk Open Space	1	Comment stated that site should be an LGS.	724
ROS14003	Filwood Playing Fields	1	Comment stated that site should be an LGS as it demonstrates the 5 values of LGS.	616
ROS17007	Henbury Court Primary School	1	Comment supported ROS designation.	808
ROS33009	Falcondale Road Allotments	1	Comment supported ROS designation.	808
ROS33018	WoT CoFE Primary School	1	Comment supported ROS designation.	808
ROS16012	The Coppice Open Space	1	Comment considered that this should be an LGS, rather than an ROS as this should include designation for recreational value, richness of wildlife and as a place of beauty and tranquillity.	883
ROS16013	Withywood Park	1	Comment considered that this should be an LGS, rather than an ROS as this should include designation for recreational value, richness of wildlife and as a place of beauty and tranquillity.	883

Sites suggested for LGS: Summary Table

Table 4 Sites suggested by respondents for Local Green Space designation

Site Name	Number of responses	Summary of comments	Respondent reference(s)
Colston's Field	1	It was suggested that part of that ROS designation should be made separate (Colston's Field) and made an LGS as it is a TVG.	66
Land to the east of Wesley College	5	It was suggested that a new single LGS could merge Sheep Wood (LGS33004) and Former Wesley College (ROS33011) and the meadow. A comment was made regarding the number of times development proposals for the site have been refused, with reference made to the Planning Inspector's decision in one instance that indicated that the grounds to the former Wesley College should be viewed as a single entity. Reference was also made to the view of the site expressed at the Site Allocations and Development Management Policies examination in public, where BCC agreed that the site met Important Open Space status and noted the historic significance of the college as a building of merit, where the adjacent site is important for understanding both the college and its setting.	117, 118, 272, 326, 374
Open Space at Alma Road	4	The comments stated that the area should be protected due to its trees, open space and public amenity.	405, 428, 776, 907
Land at Whiteladies Gate, Cotham (BDA1002)	1	Supported the designation of the part of the BDA1002 allocation as LGS.	405
Cote House	1	Suggested that grounds around the house should be protected through LGS status.	326
Land at College Rd, Fishponds	2	It was suggested that that area should be an LGS to protect the open space.	544, 740
Bonnington Walk former allotments site	1	It was suggested that that area should be an LGS to protect open space and wildlife.	676
Land north of Glencoyne Square	1	It was suggested that that area should be an LGS	724
Filwood Park (land within former BSA1110)	1	It was suggested that that area should be an LGS as the green space should be protected, and this is important due to the population growth in the area.	616
Stapleton Cricket Club (BDA1301)	1	It was suggested that that area should be an LGS due to recreational value and historical significance.	624
Ashton Meadows	2	It was suggested that that area should be an LGS as it meets all the criteria for allocation	803, 804
Land north east of Blaise Castle SNCI	1	It was suggested that that area should be an LGS	808
green spaces adjacent to River Trym (multiple)	4	It was suggested that that area should be an LGS to protect green space and wildlife corridor.	808, 822, 897, 954
Blackswarth Road Wood	1	It was suggested that that area should be an LGS as it meets criteria of historic significance, richness of wildlife, beauty and tranquillity	814
Bristol-Bath Cycle / Railway Path	1	It was suggested that that area should be an LGS as it meets 5 criteria of LGS and should also include green space south of Hassell Drive and north of St Philips Road, where the cycleway begins.	894

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

Yew Tree Farm	1	It was suggested that that area should be an LGS on the basis of its environmental protection, habitats and encouragement of pollinating insects.	897

Sites suggested for ROS: Summary Table

Table 5 Sites suggested by respondents for designation as Reserved Open Space

Site Name	Number of responses	Summary of comments	Respondent reference(s)
Penfield Road Open Space St Werburgh's	2	It was suggested that that area should be an ROS at least as it is used extensively by pub customers and children in summer and attracts a large colony of sparrows and other birds, which cannot be overstated in importance given sparrow populations in serious decline.	36, 72
Open Space at Alma Road	7	It was suggested that that area should be an ROS due to trees and open space. Comments requested that the site should be improved as it has potential.	16, 46, 49, 164, 409, 428, 907
Land to the east of Wesley College	2	Suggests allocation as ROS. Comment is made on the Appeal decisions in relation to two planning applications on the site and that applications for development on this site have been either recommended for refusal by BCC, refused by DCC or dismissed by the Planning Inspectorate seven times since 2012. Reference is made to the Planning Inspectors decision that indicated that the grounds to the former Wesley College should be viewed as a single entity. Reference is also made to view of the site expressed at SADMP examination in public, where BCC agreed that the site reached IOS status and noted the historic significance of the college as a building of merit, where the adjacent site is important for understanding both the college and its setting.	117, 118
Land at Whiteladies Gate, Cotham (BDA1002)	1	S It was suggested that that area should be an ROS	405
Elmfield School for the Deaf	1	It was commented that this site gets no mention in the Local Plan Review either as a potential site for development, or any designation as LGS or ROS. As this site is currently owned by BCC (Education), it is queried as to why does it not gain ROS status, or get earmarked for potential future development	326
War Memorial (corner of Apsley Road and Whiteladies Road)	2	Support was expressed for the designation of the site as Important Open Space / Public Amenity. It was suggested that that area should be an ROS.	409, 907
Sea Mills Community Garden	1	It was suggested that that area should be an ROS because the garden is a valued community asset, which is available for community use: volunteering sessions, and activity groups for children. The site is home to various wildlife and offers a food growing space.	414
Kennel Lodge 1	2	It was requested that the site is given ROS status and given maximum recognition within the local plan.	390, 909
Kennel Lodge 2	2	It was requested that the site is given ROS status and given maximum recognition within the local plan.	390, 909
Bower Ashton	2	It was requested that the site is given ROS status and given maximum recognition within the local plan.	390, 909
Gladstone Street Park in St. George	2	It was suggested that that area should be an ROS because it provides small but important green space in the area	454, 743
Land at College Rd, Fishponds	2	It was suggested that that area should be an ROS	544, 740
Elm Lane Amenity Area	1	It was suggested that that area should be an ROS	907

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

Thomas Memorial (top of Whiteladies Road)	1	It was suggested that that area should be an ROS	907
Victoria Rooms (fountain surround)	1	It was suggested that that area should be an ROS	907
West end of Belgrave Hill	1	It was suggested that that area should be an ROS now that planning for site development has been refused.	907
Civil Service sports fields / Muller Road Recreation Ground	1	It was suggested that that area should be an ROS because it is identified as essential playing fields space under the city's protected sports pitch strategy.	895
Lockleaze Housing Greens	1	It was suggested that that area should be an ROS (except where residents agree they want to convert some space for extra parking) providing essential green space in residential areas where children can play outdoors.	895
Lockleaze Communitiy Orchard	2	It was suggested that that area should be an ROS as it has been cultivated for local food growing, vital to our sustainable and affordable food community priority.	704, 895
Hengrove Park (30ha)	1	It was suggested that that area should be an ROS	629
Land at Cherry Orchard Camphill Community	1	It was suggested that that area should be an ROS it is an Site of Nature Conservation Interest (SNCI)	808
Hotwells and District Allotment Association plots	1	It was noted with concern that only 2 of the 5 allotment areas of the Hotwells and District Allotments Association plots are indicated on the maps within the Open Space Document. It was considered that they should all be included and hold the same status.	731
Bonnington Walk former allotments site	1	It was requested that the site is reclassified as ROS or LGS as it is considered to meet LGS criteria. It was argued that while Lockleaze has a high amount of open space in comparison to other areas, this site is unusual in that it is not grassland or a grassed recreation area but has been left to nature and it therefore important for wildlife.	676

Appendix C – Retained Local Plan Policies

1. Economy

Table 1 Comments received relating to retained policies

Retained Policy	Number of responses	Summary of comments	Respondent reference(s)
BCAP6: Delivery of employment space in Bristol City Centre	0		
BCAP8: Maritime industries	1	The comment requested for the inclusion of the provision of tall ships, which is a valuable part of Bristol's identity and vibrancy of the Harbour area.	120
BCAP10 Hotel Development	0		
BCAP11 University and hospital development	2	<p>It was commented that the Bower Ashton Campus is not specifically allocated for an educational use and it is questioned whether it could be explicitly referred to in a policy akin to the Retained Policy BCAP11, which specifically refers to the University of Bristol precinct and supports its continued development.</p> <p>One respondent supported the principle of the retention of policy BCAP 11 and concurred with the reasoning behind its retention, acknowledging the importance of the educational sector within the diverse nature of the city. However, it was considered that there is an opportunity for BCAP11 to be expanded to offer greater flexibility in enabling the development of educational and ancillary uses associated with the University.</p>	488, 887
BCAP12: Vacant sites and temporary uses	1	One comment stated that the policy should be extended beyond the city centre into the Outer Urban Area.	884

2. Shopping, Services and the Evening Economy

Table 2 Comments received relating to retained policies

Retained Policy	Number of responses	Summary of comments	Respondent reference(s)
BCS7: Centres and Retailing	5	<p>Three responses requested a change to retail policies including consideration of the role of Eastgate.</p> <p>Two responses supported the retention of the policy.</p>	737, 774, 818, 845, 891

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

DM7: Town Centre Uses	3	<p>One respondent commented the demand for retail space is falling and is concerned that the requirement for high quality retail space to be provided in new developments would have an adverse impact on secondary shopping centres. It was requested that policies are amended to reflect economic reality, and to be supportive of potential conversions away from retail on the fringes of secondary retail areas.</p> <p>One respondent considered it inappropriate to provide blanket retail policy to site allocations, stating that it should be made clear in policy that the usual tests which should be applied to proposals for town centre uses in out of centre locations are not required of site allocations, with consideration of sequential and impact tests having been determined and satisfied by the Council at the allocation stage.</p> <p>One respondent supported the retention of this policy and suggested the 2013 retail evidence be updated.</p>	737, 829, 891
DM8: Shopping Areas and Frontages	4	<p>One comment requested a policy which provides a presumption against planning applications for new advertising billboards.</p> <p>One respondent commented that the demand for retail space is falling and is concerned that the requirement for high quality retail space to be provided in new developments would have an adverse impact on secondary shopping centres. It was requested that policies are amended to reflect economic reality, and to be supportive of potential conversions away from retail on the fringes of secondary retail areas.</p> <p>One comment supported the strengthening of policy which protects shop fronts.</p> <p>One comment was generally supportive however was concerned that criteria for change of use from A1 are unduly onerous and inconsistent with aim of emerging policy to support viability and vitality of Broadmead and states that it should follow principles of draft policy DS1 allowing for a suitable mix of uses.</p>	534, 737, 798, 818
DM9: Local Centres	2	One comment and a petition of 1850 signatures was concerned about the impact of advertising on local economic development and requested that a policy on outdoor advertising is included in the plan.	794, 811
DM10: Food and Drink Uses and the Evening Economy	2	One comment supported the retention of the policy. One respondent suggested that the importance of Stokes Croft to the night time economy should be recognised and supported in the local plan,	818, 957
DM11: Markets	0		
BCAP13: Strategy for retail development in Bristol City Centre	1	The comment supported the policy and suggested that the 2013 retail evidence underpinning policy should be updated as part of LPR.	891
BCAP14: Location of larger retail development in Bristol City Centre	1	The comment supported the policy and suggested that the 2013 retail evidence underpinning policy should be updated as part of LPR.	891
BCAP15: Small-scale retail developments and other related uses in Bristol city centre	0		

BCAP16: Primary shopping frontages in Bristol City Centre	0		
BCAP17: Secondary shopping frontages in Bristol City Centre	0		
BCAP18: New market provision in Bristol City Centre	0		
BCAP19: Leisure use frontages in Bristol City Centre	1	The comment requested the improvement of the quality of walkways, highstreets and tourism & leisure areas through investment from tourism tax revenue.	323

3. Green Infrastructure

Table 3 Comments received relating to retained policies

Retained Policy	Number of responses	Summary of comments	Respondent reference(s)
BCS9: Green Infrastructure	5	<p>One comment supported the retention of this policy.</p> <p>Natural England suggested revised policy text for this policy.</p> <p>It was commented that draft Local Plan is lacking in developing a deliverable and significant GI vision in the plan, linking policies around climate change, around climate change, transport, health, pollution, townscape character, place-making, biodiversity and flood prevention. It was considered that the plan would benefit from an interactive and more detailed form of GI map of Bristol, and that there is a lack of policy related directly to biodiversity and ecology.</p> <p>One comment stated that there needs to be more emphasis on increasing canopy cover, which is a goal in the policy. This needs to be applied more in planning decisions. BCS9 was intended to mitigate heatwaves, floods and other effects.</p>	607, 636, 820, 861, 907

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

DM15: Green Infrastructure Provision	9	<p>There was general support for the retention of the policy but there was some concern that it was not being applied consistently enough as it has resulted in a net loss of green infrastructure.</p> <p>One comment suggested that the wording be amended to require developers to include tree planting proposals in their landscape plans.</p> <p>One comment stated that the draft Local Plan is lacking in developing a deliverable and significant GI vision in the plan, linking policies around climate change, around climate change, transport, health, pollution, townscape character, place-making, biodiversity and flood prevention. It was considered that this would benefit from an interactive and more detailed form of GI map of Bristol and that there is a lack of policy related directly to biodiversity and ecology.</p> <p>One comment, while supporting retention of this policy, considered that the maps of the wildlife corridors and networks in the policy document lack sufficient detail. Most notably, river corridors are absent - Westbury arm of the River Trym is shown but not numbered or named in the map key. The GIS map on Pinpoint is disjointed and does not include whole of River Trym.</p>	118, 607, 627, 635, 802, 808, 861, 907, 909
DM16: Open Space for Recreation	3	<p>One comment supported the retention of the policy.</p> <p>One comment requested that the policy be amended to recognise changes to CIL regulations which require that obligations should only be requested where they specifically address an impact of the proposed development.</p> <p>One comment stated that more A and B trees should be saved and if there does need to be replacement, then it should be correctly sized trees which will give same canopy cover after about 20 years as the one felled and eventually more. Hedges should not be provided as replacement for trees as this does not help with increasing canopy cover. It was suggested that a practice note is produced to codify case law relating to trees - Bristol Tree Forum have submitted 8 specific points to be included.</p>	607, 888, 907
DM17: Development involving existing green infrastructure	4	<p>Two comments supported the retention of this policy and the protection it provides for wildlife.</p> <p>One respondent requested an amendment requiring the replacement of trees in such a way as to contribute to an overall doubling on site of tree canopy cover by 2046.</p> <p>One respondent supported the retention of the policy and made various suggested amendments to both the policy wording and the Bristol Tree Replacement Standard (BTRS).</p>	118, 607, 802, 909
DM19: Development and Nature Conservation	4	<p>One comment supported the retention of the policy.</p> <p>Three comments requested that the policy moves away from conservation and towards a biodiversity net gain when approving development. Two of these comments have recommended ways to reword the policy.</p>	486, 635, 802, 909
DM20: Regional Important Geological Sites	0		

DM21: Development of Private Gardens	4	<p>One comment supported the retention of the policy.</p> <p>One comment stated that development of gardens for modular construction should only be allowed where it would provide a social benefit.</p> <p>One comment considered that the policy should be stronger regarding protecting garden spaces, given emphasis in new policies on local food growing space and need for more trees and green infrastructure, as well as mitigating air quality.</p> <p>One comment objected to the development of private gardens and the policy text which states that this would be prevented where this 'would harm the character and appearance of the area'. The comment requested a ban on the conversion of gardens to hardstanding, a ban on parking of cars in gardens where this means bins need to be on the pavement, a ban on the introduction of synthetic grass, and a ban on the loss of garden space to EV charging.</p>	37, 810, 884, 909
DM22: Development Adjacent to Waterways	0		
BCAP22: Habitat preservation, enhancement and creation on waterways	0		
BCAP23: Totterdown Basin enhancement	1	The comment suggested the inclusion of a size restriction on development to reduce potential for waterway contamination.	751
BCAP24: The St. Paul's Green Link	1	One comment supported the development of the green route.	798
BCAP25: Green infrastructure in city centre developments	1	Natural England noted that this policy requires development in the city centre to include an element of green infrastructure where possible as integral part of design. Natural England suggested where not possible, a contribution to GI elsewhere would be justified.	820

4. Transport

Table 4 Comments received relating to retained policies

Retained Policy	Number of responses	Summary of comments	Respondent reference(s)
DM23: Transport Development Management	3	<p>One comment was in support of the policy.</p> <p>One comment was concerned that this policy would not allow for light rail rapid transit along the corridors including Brislington.</p> <p>One comment considered that the policy needs to be supplemented by a reference to the Transport Development Management guide for developers.</p>	612, 631, 905

DM25: Greenways	1	One comment stated that Greenway protection policy conflicts with the Mayor's light rail project; commenting that MetroBus routes could also be converted to light rail including the South Bristol Link road.	905
BCAP26: Old City - Reducing traffic in the heart of Bristol City Centre	0		
BCAP29: Car and cycle parking	1	The comment supported the retention of this policy.	631

5. Community Facilities

Table 5 Comments received relating to retained policies

Retained Policy	Number of responses	Summary of comments	Respondent reference(s)
BCS12: Community Facilities	2	One comment supported the policy but suggested it should be made clear within the supporting text that these policies include cultural facilities to ensure conformity with the NPPF. One comment requested more clarity over the disposal of public assets in the area of Knowle West and the way in which these are being disposed of.	379, 616
DM5: Protection of Community Facilities	3	One comment argued that facilities should not be impeded by high hire costs. One comment supported the policy but suggested it should be made clear within the supporting text that these policies include cultural facilities to ensure conformity with the NPPF, suggesting revised amended text. One comment also suggested an amendment to make clear that a facility must be willing and able to make use of buildings.	216, 379, 825
DM6: Public Houses	1	One respondent commented that this policy is not being used by planning officers who readily accept arguments by developers that pubs are often not viable and that there is alternative provision nearby.	905

6. Flood Risk and Water Management

Table 6 Comments received relating to retained policies

Retained Policy	Number of responses	Summary of comments	Respondent reference(s)
BCS16: Flood Risk and Water Management	1	Wessex Water noted that retained Policy BCS16 text must be applied to all proposed development in the Annex "Draft Development Allocations".	709
BCAP5: Development and flood risk	0		

7. Design and Conservation

Table 7 Comments received relating to retained policies

Retained Policy	Number of responses	Summary of comments	Respondent reference(s)
BCS21: Quality Urban Design	3	Two comments stated that the reference to Building for Life Very Good standard is out of date. One comment noted that Policy BCS21 appears weak due to the lack of a congestion charge zone which should be introduced once a comprehensive MetroWest/light rail network has been completed.	816, 818, 905
DM27: Layout and Form	2	Two comments stated that the text relating to height, scale, and massing requires development to 'be appropriate to the immediate context.' may be read as directly contradictory to DC2 and DC3	816, 818
DM28: Public Realm	0		
DM29: Design of New Buildings	3	Three comments were concerned that there is insufficient regard given to policies on advertising.	644, 794, 811
DM30: Alterations to existing buildings	2	Two comments were supportive of the approach of this policy, which recognises it should be applied on a site by site basis with flexibility.	816, 818
DM32: Recycling and refuse provision in new development	1	One comment stated that they would like to see communal bins in all new developments as roads which have communal bins are much more pleasant, with fewer bins on pavements, and can be landscaped or fenced to mitigate negative visual impacts	428
BCS22: Conservation and the Historic Environment	0		
DM31: Heritage assets	0		
BCAP30: Pedestrian routes	4	The comments requested that the map accompanying this policy should be updated with routes completed since 2015 and with newly proposed routes from both the City Centre Framework and from LCWIP as well as proposals for routes connecting to the new strategic development areas within walking distance of the centre. One comment requested the improvement of the quality of walkways, highstreets and tourism & leisure areas through investment from tourism tax revenue.	323, 660, 791, 805
BCAP31: Active ground floor uses and active frontages in Bristol City Centre	1	The Environment Agency stated that flood risk needs to be considered, in respect of the vulnerability of suitable uses on ground floor and advises that flood resistance and resilience measures must be incorporated.	964
BCAP32: Quayside walkways	3	One comment supported the policy. The Environment Agency stated that quayside walkways need to ensure harbour walls can be inspected in the interest of flood risk management. One comment requested the improvement of the quality of walkways, highstreets and tourism & leisure areas through investment from tourism tax revenue.	323, 963, 964
BCAP34: Coordinating major development in Bristol City Centre	0		

8. Health and Wellbeing

Table 8 Comments received relating to retained policies

Retained Policy	Number of responses	Summary of comments	Respondent reference(s)
DM34: Contaminated Land	0		
DM35: Noise Mitigation	0		
DM14: The Health Impacts of Development	3	<p>Two respondents objected to the retention of this policy without alteration and recommended that health considerations are incorporated into Design and Access Statements (or Environmental Statements) for larger developments rather than a Health Impact Assessment.</p> <p>One respondent stated that it should be made explicit that the policy covers both physical and mental health and recommended that if evidenced that development will cause higher and sustained stress levels which could cause long term mental health problems and anxiety then it should be refused.</p>	420, 893, 907

9. Utilities and Minerals

Table 9 Comments received relating to retained policies

Retained Policy	Number of responses	Summary of comments	Respondent reference(s)
DM36: Telecommunications	5	Five comments were concerned about the health impact of 5G data infrastructure to people and wildlife. There was particular concern for children and pregnant women.	433, 447, 582, 598, 908
DM37: Unstable Land	1	One comment supported the retention of this policy.	642
DM38: Minerals Safeguarding Areas	2	<p>One comment supported the retention of this policy.</p> <p>One comment stated that the policy conflicts with DS12 as it affects the Bath Road allocation. The comment also stated that insofar as it affects the allocated site, it should be deleted on the proposals map, as the extraction of coal reserves in this location is unlikely to be viable or desirable in planning and environmental terms.</p>	642, 845

10. City Centre Places

Table 10 Comments received relating to retained policies

Retained Policy	Number of responses	Summary of comments	Respondent reference(s)
BCAP36 Bristol Shopping Quarter	3	One comment suggested the addition of an approach for the Bearpit to be retained as open space for common use. One comment supported the policy but suggested 2013 retail evidence underpinning the policy should be updated. One comment requested the improvement of the quality of walkways, highstreets and tourism & leisure areas through investment from tourism tax revenue.	323, 891, 894
BCAP37 High Street, Wine Street and Castle Park	2	One comment expressed support for the continued allocation of the Site (KS04) for office-led mixed-use development. One comment requested the improvement of the quality of walkways, highstreets and tourism & leisure areas through investment from tourism tax revenue.	323, 843
BCAP40 Redcliffe Way	3	It was commented that local community consultation indicates that there is a suitable site for community-led development for up to 130 homes as part of the scheme. It was recommended that this should be specifically designated for community-led housing as part of the new development allocations and that the place principles should follow those as set out in the draft Redcliffe Neighbourhood Plan. One comment requested the improvement of the quality of walkways, highstreets and tourism & leisure areas through investment from tourism tax revenue.	323, 842, 904

Appendix D Respondent List

Respondent List Alphabetical

Table 1 Respondent List Alphabetical

Response Reference	Respondent
291	15 Residents of Stoke Paddock Rd & Cheyne Rd
882	A2Dominon
326	Aburrow, Alan
102	Ackerman, Natalie
608	Action for Balanced Communities Bristol
722	Acton-Campbell, Rob
814	Acton-Campbell, Susan
357	Adams, Claire, Adrian & Jessica
204	Adams, Ginny
613	Adams, Ginny
313	Adams, Kathy
794	Adblock Bristol
200	AEK-BOCO Football Club
435	Ah-tow, Ricky & Lesley
445	Akers, Mike
840	Akzo Nobel CIF Nominees Ltd
162	Allen, D K
283	Allt, John & Janet
130	Always, Sue
351	Anderson, Chris
386	Anderson, S
584	Andrews, Gary
542	Andrews, Michael and Janet
644	Angel, David
015	Anstey, Emma
020	AP Redfearn Consultancy Ltd
650	Applin, Mr & Mrs J
821	Apsley House Capital
517	Archard, A
904	Ashley Vale Action Group
073	Aslam, Saffiya
421	Aspect360 Ltd
599	Aspin, Valerie
523	Atkin, James
660	Audrey, Suzanne
659	Austin, Rachel
159	Avery, Peter

631	Avon Capital Estates 1 LLP
280	Avonmouth Planning Group
056	Backwell, James
364	Baddeley, Adam
628	BAE Systems
123	Baker Ruff Hannon LLP
549	Baker, David and Jenny
773	Baker, Des
340	Baker, Toby
665	Balderson, Luba
668	Balderson, Nicholas
424	Balfry, Graham
081	Barnes, Andrew
468	Barnes, Luci Gorell
562	Barraclough, Lorna
851	Barratt Homes Bristol
002	Barrie, Ashford
444	Barry, Paul
551	Bartlett, Catherine
093	Bartley, Lisa
903	Bath & North East Somerset Council
967	Batley, Wendy
346	Battiwalla, Isobel
298	Bayly, Graham and Rachel
836	BBC Pension Trust Limited
662	Beake, Delia and Alan
344	Beard, Jasmine
433	Beare, Sally
509	Beauhill, Rosalind
383	Bedminster Down and Uplands Society
856	Bedminster Energy Group
700	Bedminster Green Campaign
764	Beedell, Jo
486	Beesley, Rosa
146	Beeston, Penny
353	Bell, Debbie
845	Bellway Homes Ltd
757	Bennett, Martin
585	Bennett, Sharon and Young, Trisha
320	Bentley, James
371	Beth, Liz
339	Bewley, Jeremy

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

664	Binding, Christopher
004	Bioregional
290	Birchall, Tricia & Rob
189	Birkinshaw, John
078	Birkinshaw, Mike
014	Bishop, Emma
367	Bishopston Society
543	Bjoroy, Robin
295	Blaikley, Alex
775	Bloomfield, Elizabeth
368	Bloxham, Andrew
554	Boere, Jennifer
323	Bohin, Sharon
156	Bond, Stephanie
158	Bond, Tom
155	Bonner, Lorna
914	Bonner, Roger
455	Bostock, David
680	Boucher, Cheri
108	Boumehdi, Rebecca
559	Bowtell, Paul
362	Brant, Judith
397	Breakspear, Richard
416	Breckels, Fabian - Councillor
286	Bridgeford, Fraser
792	Bright Green Futures
652	Brimble, Peter G
232	Brislington Cricket Club
795	Bristol @ Night Subgroup
862	Bristol Airport
891	Bristol Alliance Limited Partnership
783	Bristol Association of Restaurants, Bars and Independent Establishments
639	Bristol Campaign Against High Rises, The
612	Bristol Civic Society
963	Bristol Disability Equality Forum
867	Bristol Energy Network
321	Bristol Food Network CIC
196	Bristol Food Policy Council
802	Bristol Friends of the Earth
637	Bristol Green Party Climate Emergency Group

011	Bristol Housing Festival
198	Bristol Malayalee Cricket Club
607	Bristol Parks Forum
854	Bristol Port Company
252	Bristol Tree Forum
909	Bristol Tree Forum
805	Bristol Walking Alliance
790	Bristol Water
309	Bristol Women's Voice & VoiceBristol
504	British Airways Pension Fund and Stargas
248	Broomfield, Elaine
758	Brown, Krystyna
224	Brown, Shirley
724	BS10 Parks & Planning
446	BS3 Planning Group
580	Buck, Brian
051	Buckingham, Angela
142	Buckland, John
894	Buckler, Luke
738	Budd, Leoni
858	Building Design Partnership Limited
310	Burman, Matthew
896	BuroHappold Engineering
426	Burt, Stephen
823	Business West
519	Butts, Alison
128	Callas, Rebecca
922	Callow, Gillian
695	Cannell, Mark
016	Cannings, Paula
966	Cantle, Tom
184	Caple, Anna
848	Caridon Development and Bellatame Ltd
115	Carroll, Martha & Elias
588	Catsis, Salvador
348	Causton, Geoff
614	Centre for Sustainable Energy
497	Chadwick, Stephanie
095	Chandler, Rob
429	Chandos Neighbourhood Association

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

436	Chapman, Philip
035	Charleston, Darla
702	Chavannes, David
723	Cheesman, Holly
013	Cheney, Ben
698	Cheung, Anita
077	Chidgey, Andrew
084	Chidgey, Dave
902	Chidgey, Matthew
229	Chilcompton Sports Cricket Club
175	Chipping Sodbury Cricket Club
719	Claresmith, Mrs
400	Clark, Kay
548	Clark, Rowland
341	Clarke, Robert
959	Claverton Healthcare Ltd
287	Clemence, Catherine
239	Cleverdon, Gill
457	Clewlow, Charlotte
603	Clifton and Hotwells Improvement Society
405	Clifton Downs Community Association
178	Clifton, Nick
469	Clover, Julian
642	Coal Authority, The
568	Coleman, Georgina
062	Coleman, Martin
740	Coleman, Susan
324	Colledge, Lisa
756	Collier, Derrick
498	Collier, Rosalind
582	Collings, Clara
066	Colston Estate Community Association
707	Comerford, Jeremy
842	Community Led Housing West
292	Complete Project Development
696	Connolly & Callaghan Group
377	Connor, Philips
815	Consortium
080	Contractor, Carla
492	Conway, Mary
625	Cook, Clare & Darren
630	Cook, Darren and Clare

432	Cook, Philip
114	Coombs, Sue
522	Corner, Ruth
555	Cossons, Alison
490	Cote Charity
489	Cotham School
712	Couling, Andy
350	Cowley, Nick
354	Cowley, Sue
633	Cox, Philip
646	CPRE Avonside
179	Craddy, Lizzy
141	Crawford, Ian
619	Crest Nicholson South West
886	Crest Strategic Projects
209	Crook, Lorna
782	Crossette, Alexander
244	Crossette, Sophie
825	CSJ Planning
647	Cubex Land Ltd
731	Cumberland Basin Stakeholder Group
812	Curo Group
648	Dandara Ltd
921	Davey, Anni
925	Davey, Reginald
389	Davies, Ella
434	Davies, Emma
061	Davies, Malcolm
087	Davis, Kevin
641	Day Group Limited
185	de Deus Silva, Michele
222	Deane, Christopher
690	Dearden, Zoe
923	Deeley Freed Estates and Sydney Freed (Holdings)
566	Defries, Scott
329	Delphin, Natalie
666	Dempsey, Gerard
330	Denman, Alexandra
478	Desai, Reethah
710	Dickie, George
392	Dimambro, Anthony
786	Dimond, Jennifer
676	Dixon, Rob

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

476	Dolphin, Nick
732	Donald, Graham & Gillian
246	Dormand, Claire
735	Dove, Michael
282	Dove, Penny
265	Drozd, James
883	Dundry and Hartcliffe Wildlife Conservation Group
315	Dunn, Emma
164	Dunn, Nathan
728	E & S Bristol
597	Eades, Jo
191	East Bristol Advice & Information Centres
601	Eastman, D & C.A
190	Easton Cowboys Cricket Club
807	Easton Ward local councillors and residents
055	Eastwood, Kathy
766	Eaves, Susan
045	Eckert, Harold
834	EconetiQ
147	Edwards-Mlangwa, Ruth & Columbus
924	Elderton, Pamela
920	Elderton, Richard
365	Ellison-Burns, Jane
708	Elstob, Sue
499	Elwes, Gemma
448	Emerson, Joyce
949	EnergieSprong UK
964	Environment Agency
132	Ettle, Keith
208	Evans, Fiona
251	Evans, Mark and Joanne & family
188	Evans, Sian
919	Evely, Susan
779	Evers, Lauren
767	Evers, Nigel
086	Exley, Zoey
372	Extinction Rebellion
739	Fairhurst, Linda
730	Fairhurst, Nathan
450	Farrell, Martin and Mariette
706	Farwell, Sue

043	Faulkner, David
705	Fenton, Ryan
266	Ffrench, Louise
656	Firmstone Consortia One Ltd
889	First West of England
595	Fletcher, Matthew
746	Foley, Mike
751	Ford, Jennifer
369	Ford, Joanna
624	Ford, Roger
270	Foster, Alison
148	Fowler, Janet
449	Freeman, Caius
241	Freeman, John
453	Freeman, Rebecca
343	French, Stephanie
294	Frenchay Cricket Club
819	FREP (Knowle) Ltd
166	Friedland, Lionel
808	Friends of Badock's Wood
242	Friends of Bellevue and Albion Road Park
116	Friends of Lamplighter's Marsh
249	Friends of St Andrews Park
518	Friends of St George Park
813	Friends of Troopers Hill
510	Frith, Leanne
839	Frontdoor Properties Ltd
875	Fusion Students LLP
110	Gaby, R. P.
524	Galliford Try Partnerships
800	Gamble, Charles and Awane, Atipoka
742	Gamlin, Roger
384	Gamsa, Helen
300	Garland, Alex
068	Garton, Tessa
537	Gaze, Lucy
841	GE CIF Trustees Limited
897	Geary, Sue
470	Geerah, Dan
547	Gellett, Vivien
962	German, P
787	Gibbs, Abi
747	Gilbert, Antony

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

754	Gill, Emily
253	Gill, Jack
322	Gladman Developments Limited
527	Gleeson, Tessa
852	Globe House Limited
163	Golding, Elizabeth
737	Gollop, Geoffrey - Councillor
023	Gonzalez, Andres
021	Gonzalez, E
634	Gonzalez, E
096	Gonzalez, Miguel
752	Gorman, Carol
267	Goug, Wilma
317	Goulondris, John & Abraham, Peter - Councillor
227	Goulding, Chris
245	Gransden, Katie
305	Grant, Stuart
255	Granville, Clare
071	Graves, Trevor
349	Gray, James
621	Green Councillor Group
832	Green Path Investments Ltd
361	Green, Jon
039	Gregory, Susan
167	Grenfell-Shaw, J.M
197	Griffiths, Malcolm & Julie
139	Gueneau, Simon
054	Gui-Batta, Clive
513	Guy, Walter
495	Gwinnell, Keren and Tim
729	Hackett, Suzan
207	Haley, Katy
464	Hall, Edwin
413	Hall, Louise
133	Hall, Martyn
228	Halpenny, J
237	Halpenny, Julia
651	Hamm, Christine
423	Hampton Park and Cotham Hill Community Group
663	Hancock, R.J.T
231	Hannan, Blaire
593	Hargreaves, Brian
550	Hargreaves, Cathy

692	Harries, Christopher
399	Harris, Robert
001	Harris, Valerie
388	Harrison, K
788	Harvey, B
205	Harvey, Rachael
687	Harvey-Scholes, Calum
496	Hatton, Susan
571	Hawkes, Rycharde
512	Hawkey, Kate
602	Hawkins, Cheryl
809	Hawkins, Derek
277	Hayes, W W
583	Hayes-Allen, Nicola
337	Haynes, Richard
673	Heard, Conrad
152	Helton
655	Hengrove and Whitchurch Park Neighbourhood Forum
302	Henn, John and Christine
335	Hester, Aimee
529	Hewson, Sarah
748	Heyer, Jenny
515	Hicklin, Clive
514	Hicks, Kim
273	Highbury Residents' Association
801	Highridge Forum Community Association
632	Highways England
539	Hiles, Andrew
538	Hiles, Margaret
382	Hirst, Pete
202	Hirst, Tania
956	Historic England
857	Hoare Lea
082	Hobbs, Ashley
150	Hobbs, Ghyslaine
069	Hobbs, Peter
373	Hodgson, Dick
036	Holden, Christine
358	Holden, Hugh
070	Hollyman, John
151	Hollyman, Susan
768	Holmes, Sheila
672	Home Builders Federation

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

417	Hood, Robert
105	Hooper, Brian William
525	Hooper, Della
192	Hoos Construction Ltd
570	Hope, Gary
772	Hore-Ruthven, Sandy
636	Hotwells and Cliftonwood Communit Association
390	Hotwells and District Allotment Association
098	Howell, Hilda
763	Hoyland, Laura
275	Hucker, Jonathan
025	Huggins, Mike and Gay
578	Hughes, Ian and Maura
120	Hughes, Matt
303	Humphreys, Chris
180	Hunt, Ivete
182	Hunt, Reg
561	Husbands, Maurice
830	IM Land
874	Industrial Properties (Barton Hill) Ltd
331	Ingram, Grace
968	IQ Student Accommodation
174	Jackson, Christine and Stephen
869	James, David
913	Jardine, Philip
049	Jeanes, Jonathan
342	Jefferson, Camilla
022	Jenkins, Carolyn
101	Jennings, Alec
243	Jenord, Susan
144	Jensen, Rosemary & Brian
458	Johnson, Jonathan
915	Jones, Anita
040	Jones, Cyril Lloyd
223	Jones, Garry & Margaret
177	Jones, Nikki
916	Jones, Peter Clive
431	Jones, Sue
194	Julia
089	Kasfikis, Cindy
213	Kealy, Hannah
260	Kearney, Chris

160	Kelly, Jacob
465	Kelly, Joanne
669	Kelly, Susan
780	Kennedy, Jon
629	Kent, Tim - Councillor
484	Key, Daniel
111	Kier Regional Building
010	Kigwana Kathleen
703	Kindling Bristol
670	King, Andrew
824	Kingsdown Conservation Group
749	Kirk, Alistair & Rachel
674	Kitchen, Caroline
447	Klein, Leonie
877	Knight Frank Investment Management
684	Knight, Jennifer
100	Knight, John
199	Knowle Cricket Club
616	Knowle West Future
884	Knowle West Media Centre & We Can Make
107	Lamb, Jimmy
406	Lamb, K.M & M.J.E
217	Lamb, Kean
855	Lambert Smith Hampton's clients
143	Lanceley, N.F & S.E
861	Landscape institute Sout West
493	Langford, Anna
818	LaSalle Investment Management
881	LaSalle Investment Management
480	Law, Christopher
482	Law, Emma
699	Lawrence, Catherine
777	Leach, Lynn & Alan
375	Lecomber, Angela
657	Legal & General Property Ltd
193	Leigh, Jessica
075	Leightley, Joseph
149	Lemon, Pauline
546	Lewis, Alexandra
031	Lewis, Bethan
505	Lewis, Martine
363	Lewis, Oli
711	Light, Alice

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

667	Light, Dave
755	Lincoln, Susie
713	Lindsay, Callum
528	Littlewood, Joan
626	LiveWest
034	Livingstone, Zoe & Peter
908	Llewellyn, Tom
169	Lloyd J Richard
844	Locality (Collated Locality's Bristol Members)
868	Locate Developments Limited
759	Lockett, Hannah
880	Lockleaze Residents Planning Group
050	Logan, Rob
438	Loney, Helen
635	Longhurst, Maddy
736	Lowe, Charlotte
003	Loy-Hancocks, Peter
439	LPC (Trull) Ltd
443	Lumkin, Simon
762	Lynch, James
109	Macey, Jane
717	Macintosh, Andy
734	Macleod, Ewen
658	Macpherson, Rory
677	Maestri, Emily & Family
430	Main, David
092	Malago Greenway Project
770	Malago Valley Conservation Group
220	Malbon, Kate
402	Mann, Michael
076	Manor community
502	Manor Woods Valley Group
467	Mansfield-Williams, Ruth
007	Marine Management Organisation
898	Marsh, Mary & Marie
332	Marshall, Peter
297	Martin, R
008	Martin, Siobhan
689	Martin, Mr & Mrs
487	Max Fordham LLP
091	May, Jennifer

090	May, Roy E
301	Mayer, Susan
536	McCann, Gemma
965	McCann, Linda
797	McCarthy, Kerry - MP
099	McCloskey, Fiona
064	McDonagh- Greaves, Liam
289	McDonald's Restaurants Ltd
682	McKibbin, Brian
753	McLoughlin, Aileen
319	McMahon, Enda
018	McPhillimy, Harry
017	Meadows, Lucie
393	Mellor, Felicity
410	Milton, Julie
072	Mina Road Park Group
060	Mitchell, Chris
563	Mizen, Paul
784	Mockridge, Mr & Mrs
494	Mohan, Helen
679	Moore, Antje
121	Moore, Dave
225	Moore, Gill
395	Moore, John
272	Moroz, John
581	Morris, Graham, Councillor
437	Morris, Sam
544	Munoz, Claire
306	Nairn, Andy
958	Nash Partnership
136	Nason, Guy
113	Nason, P A
129	National Custom and Self-Build Association
047	National Grid
638	National Grid Electricity Construction (National Grid)
820	Natural England
409	Newberry, Paul
428	Newberry, Salpal
268	Newrick, Debra
828	NHS Property Services Ltd
761	Nicholls, Susan
778	Night Watch Board
403	North Somerset Council

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

623	Northern Slopes Initiative
024	Nottage, Julie
661	O&H Properties Ltd
088	Ogilvy-Scott, Jill & Scott, Simon
374	O'Kane, Mick
378	Old Bristolians Westbury Cricket Club
053	Oldfield, Alison
704	O'Rourke, Paula - Councillor
181	Pales, James
408	Parish of Holy Nativity
325	Parish, John
535	Parker, Julie
097	Parsons, Jennifer
059	Parsons, Sharon
122	Passivhaus Trust Team
276	Passmore, Amy
833	Patch, Jon
187	Patchway Cricket Club
952	Paul Amos
727	Payne, Alan
714	Payne, Bryony
721	Payne, Jill
452	Pearce, Thomas
531	Pearson, Karen Elaine
466	Pearson, Simon
785	Peddie, Emma
776	Penrose, Gillian
085	Penrose, Jack
888	Persimmon Homes Severn Valley
849	Persimmon Homes Wessex
715	Phelan, Paul
063	Phillips, Neil
422	Phillips, Tim
917	Pick, Michele
774	Pickersgill, Ruth - Councillor
238	Pickles, Colin
685	Pickles, Ellie & Family
347	Picton, Jason
441	Pill, Stephen
044	Pine, Felicity
811	Plan-EL Neighbourhood Planning Group
643	PMG Services
474	Pocock, Helen

067	Podmore, Martin
765	Pople, Jo
473	Poppy, Jenny
622	Portland Brown
605	Positive Impact through Community Housing
694	Potenza, Curzio
173	Potter, Christina
065	Powell, Gail
850	Powell, Helen
259	Powell, Rich
221	Powis, Harriet
206	Powis, Rebecca
586	Pratley, C.J
145	Preddy, Richard
278	Preece, Alan
503	Preece, Sheila
598	Prescott, Fiona and Little, Satch and Matilda
793	Pride of Place – Hartcliffe, Withywood and Bishopsworth
352	Prideaux-Ghee, Steve
485	Prior, Chris
376	Prior, Patricia
345	Pugh, Sarah
532	Quartley, Kevin and Eddy, Richard - Councillor
579	Quilter, Bruce
955	Quilter, Jo
744	Race Equality CORE
284	Radford, John
688	Radford, Liz - Councillor
401	Railfuture
791	Ramblers' Avon Area
419	Raymond - Barker, John
009	Read, Liz
885	Redcliff Quarter MCC LLP
029	Redman, Neil
866	Redrow Homes and Newcombe Estates
745	Reeson, Geoff
463	Revell, Valerie
564	Revelle, Tony
878	RIBA SW
718	Ridgeon, Sarah

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

219	Ring, Peter and Helen
760	Rivers, Mary
336	Roberts, Cilla
576	Roberts, John
591	Roberts, Joshua
553	Roberts, Julie, Mike & Elijah
274	Roberts, Rachel
028	Robertson, Rowan
606	Roblin, Lauren & Lee
271	Robson, Bob
590	Rocke, Andrew
540	Roddy, Dan
508	Roe, Alan
520	Roe, Patricia
475	Rogers, Louise
226	Rollings, Phil
334	Rosato, Beth
138	Rose, Martin
511	Rose, Martin & Elizabeth
257	Rose, Viviane
157	Rosewell, Peter
103	Ross, Jon
521	Ross, Sheila
472	Round, Mark
471	Round, Nicola
168	Rowe, Helen
195	Rowe, Linda
701	Rowe, Robyn
104	Royal Mail Group Ltd
556	Ruggles, Rowan
211	Rumsey, Sue
135	Rundle, Carol
134	Rundle, Martyn
230	Russouw, Lauren
356	Rydon, Hilary
165	Sadler, Piers
250	Sapoff, Gregory
678	Saunders, Sally
847	Savory, M
218	Schoenmann, Julietta
725	Scott, Mark
953	Sell Ann
387	Sell, M.P
285	Serle, Christopher

451	Seymour, Adrian
131	Seymour, Joe
380	Sharp, Anne
127	Sharp, Oliver
577	Shaun
038	Shea, Christopher
269	Sheather, Judith
741	Sheather, Keith
600	Shergold, Ian
479	Shergold, Karen
552	Shinner, Michael
048	Sibille, Raphael
534	Siebert, Ed
864	Sille, Eric
831	SJ Honeyfield Properties Ltd
404	Slatton-Buell, Johanna
483	Sloggett, Katie, Tim and Oscar
557	Smart, Robert
954	Smith Jean
154	Smith, Angela
006	Smith, Barney
507	Smith, Claire
041	Smith, Dannielle
032	Smith, Deborah
385	Smith, Deborah
263	Smith, Paul
293	Smith, Philip
170	Smithen, Sharon
843	SMLP Bristol Partnership
394	Smyth, Jenifer
697	Sneyd Park Residents Association
125	Sohi, Ahmad & Umar
126	Sohi, Khadija
871	South Bristol Business
106	South Bristol Wrong Road Group
610	South Gloucestershire Council
870	South West HA Planning Consortium
905	South West Transport Network
541	Southgate, Penny
611	Southmead Development Trust
893	Sovereign Housing Association
247	Spellward, Paul
442	Sport England

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

892	Square Bay (Property) Ltd
798	St Pauls Planning Group
865	St. Modwen Developments Ltd
057	Stagg, Nelia
398	Stammers, Sophie
176	Staniszewska, Gabriela
281	Staniszewska, Teresa
161	Stanleigh, Kate
074	Stapleton Cricket Club
019	Stephenson, Alex
005	Stephenson, Leise
907	Stevens, Clive - Councillor
216	Stirling, Charles
212	Stocks, Victoria
604	Stoke Bishop Residents' Planning Group
957	Stokes Croft Planning Group
407	Stone, Deborah
781	Strand, Linnea
254	Strickland, Susan
314	Stride Brothers Ltd
414	Stuart, Maria
827	Summix FRB Developments Ltd
837	Sustainable Britain Ltd
822	Sustainable Westbury-on-Trym
333	Sutcliffe, Zoe
412	Swallow, John & Sheila
961	Swan, Andrew
569	Sweet, Evan
462	Sweet, Ian
683	Sweet, Jeremy & Natalie
572	Sweet, Paul
649	Sweet, Robert & Stephanie
653	Swift, Alan
366	Swinburn, Chris & Ghislaine
261	Swithinbank, David
140	Swithinbank, Lucy
456	Symonds, Doreen
124	Talbot, Frances
573	Talbot, Neill
872	Taupo Group Ltd
186	Taveners Cricket Club
420	Taylor Wimpey
307	Taylor, Alan

418	Taylor, Hilary
210	Taylor, Martha
681	Taylor, Rona
299	Taylor-Abreu, Olivia
890	Telereal Trillium
396	Templar, Linda
256	Templeton-Dudley, Natalie
379	Theatres Trust, The
594	Thomas, Alison and Steve
918	Thomas, Andrea
026	Thomas, Chris
046	Thomas, Ian
030	Thomas, Jane
234	Thomas, Rita
500	Thompson, Alan
720	Thompson, Lucie
481	Thorne, Sharon
338	Thouless, Rod & Ruth
425	Threlfall, Mhairi - Councillor
873	Thriving South Bristol Group
201	Timsbury Cricket Club
895	Tincknell, Estella and Kirk, Gill - Councillors
617	Tinsley, Kevin
789	Tiny House Community Bristol
803	Tippett, Wendy
506	Todd, Mary
501	Tomas, F
411	Toogood, Jeremy
686	Totterdown Childrens Community Workshop
316	Totterdown Residents Environmental & Social Action
530	Townsend, John
838	Transport for Greater Bristol Alliance
171	Trimble, Beki
620	Tugman, S
863	UK Green Building Council
817	Unit DX
876	Unite Students
615	United Communities
887	University of Bristol
415	University of Bristol Sustainability team

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

488	University of the West of England
671	Urban Tranquility Development Ltd
279	Vandries, Nicola
691	Vattenfall Heat UK
829	Vence LLP and Ashton Gate Ltd
816	VHML
311	Walker, Joanna
675	Walker, Mary & Nicholas
355	Walker, Sophie
137	Wall, Jerry
587	Wall, Katharine
567	Wallis - Langley, Benita
459	Wallwork, Lucy
052	Walsh, Amy
033	Walters, Robert
370	Ward, Claire
799	Watkin Jones Group
359	Watson, Margaret
112	Watson, Peter
027	Watt, Iain & Behennah, Daphne
308	Watten, Nikki
860	We Love Stoke Lodge
391	Weale, Thomas
304	Webb, Sarah
460	Weber, Maggie
240	Weeks, Jenny
545	Weeks, Peter
012	Welbourn, Mary
491	Welding Industries Ltd
726	Welham, Kathy
769	Welham, Kathy
117	Wesley Action Group
709	Wessex Water
810	Westbury on Trym Society
235	Westin-super-mare Cricket Club
560	Weston, Mark - Councillor
318	Wherlock, Alan
296	Wherlock, Ann
360	Wherlock, Paul
589	White, Jenny
083	Whitfield, Mike
094	Whitworth, Mike
262	Wickens, Russell

804	Wickham, Stephen
592	Wilkie, Jane
153	Wilkins, Andy
236	Williams, Andy
716	Williams, Bliss
693	Williams, Gareth
565	Williams, Gwen
233	Williams, Jacqueline
558	Williams, Jason
258	Williams, Joanna
454	Williams, Maxine
743	Williams, Nigel
079	Williams, Sandra
461	Wilson, Amy
796	Wilson-Tucker, Roger
526	Wilton, Larissa
477	Wilton, Robert
627	Windmill Hill and Malago Community planning Group
119	Winter, Mark
183	Winterbourne Cricket Club
203	Wintle, Avis
645	Withers, Catherine
037	Wolfe, Emily & Margetts, S
750	Wolfenden, Sheila
058	Wollaston, Judith
618	Wood, Andrew
771	Wood, Christopher & Helen
950	Wood, Matt
118	Woodland Trust
516	Woodward, Ian
214	Woodward, Janet
381	Wright, Graham
328	Wright, Julie
172	Wright, Peter and Rosemarie
575	Wyatt, Diana
574	Wyatt, Jonathan
609	Wyatt, Len
846	Yarlington Homes
640	Yate, S
835	Young, Christian
042	Young, Judith
327	Young, Ken and Anita
879	YTL

264	Yuill, Sally
440	Yulia
596	Zekaria, Yael

Respondent list by Reference

Table 2 Respondent list by Reference

Response Reference	Respondent
001	Harris, Valerie
002	Barrie, Ashford
003	Loy-Hancocks, Peter
004	Bioregional
005	Stephenson, Leise
006	Smith, Barney
007	Marine Management Organisation
008	Martin, Siobhan
009	Read, Liz
010	Kigwana Kathleen
011	Bristol Housing Festival
012	Welbourn, Mary
013	Cheney, Ben
014	Bishop, Emma
015	Anstey, Emma
016	Cannings, Paula
017	Meadows, Lucie
018	McPhillimy, Harry
019	Stephenson, Alex
020	AP Redfearn Consultancy Ltd
021	Gonzalez, E
022	Jenkins, Carolyn
023	Gonzalez, Andres
024	Nottage, Julie
025	Huggins, Mike and Gay
026	Thomas, Chris
027	Watt, Iain & Behennah, Daphne
028	Robertson, Rowan
029	Redman, Neil
030	Thomas, Jane
031	Lewis, Bethan
032	Smith, Deborah
033	Walters, Robert
034	Livingstone, Zoe & Peter

035	Charleston, Darla
036	Holden, Christine
037	Wolfe, Emily & Margetts, S
038	Shea, Christopher
039	Gregory, Susan
040	Jones, Cyril Lloyd
041	Smith, Dannielle
042	Young, Judith
043	Faulkner, David
044	Pine, Felicity
045	Eckert, Harold
046	Thomas, Ian
047	National Grid
048	Sibille, Raphael
049	Jeanes, Jonathan
050	Logan, Rob
051	Buckingham, Angela
052	Walsh, Amy
053	Oldfield, Alison
054	Gui-Batta, Clive
055	Eastwoodk Kathy
056	Backwell, James
057	Stagg, Nelia
058	Wollaston, Judith
059	Parsons, Sharon
060	Mitchell, Chris
061	Davies, Malcolm
062	Coleman, Martin
063	Phillips, Neil
064	McDonagh- Greaves, Liam
065	Powell, Gail
066	Colston Estate Community Association
067	Podmore, Martin
068	Garton, Tessa
069	Hobbs, Peter
070	Hollyman, John
071	Graves, Trevor
072	Mina Road Park Group
073	Aslam, Saffiya
074	Stapleton Cricket Club
075	Leightley, Joseph
076	Manor community
077	Chidgey, Andrew

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

078	Birkinshaw, Mike
079	Williams, Sandra
080	Contractor, Carla
081	Barnes, Andrew
082	Hobbs, Ashley
083	Whitfield, Mike
084	Chidgey, Dave
085	Penrose, Jack
086	Exley, Zoey
087	Davis, Kevin
088	Ogilvy-Scott, Jill & Scott, Simon
089	Kasfikis, Cindy
090	May, Roy E
091	May, Jennifer
092	Malago Greenway Project
093	Bartley, Lisa
094	Whitworth, Mike
095	Chandler, Rob
096	Gonzalez, Miguel
097	Parsons, Jennifer
098	Howell, Hilda
099	McCloskey, Fiona
100	Knight, John
101	Jennings, Alec
102	Ackerman, Natalie
103	Ross, Jon
104	Royal Mail Group Ltd
105	Hooper, Brian William
106	South Bristol Wrong Road Group
107	Lamb, Jimmy
108	Boumeahdi, Rebecca
109	Macey, Jane
110	Gaby, R. P.
111	Kier Regional Building
112	Watson, Peter
113	Nason, P A
114	Coombs, Sue
115	Carroll, Martha & Elias
116	Friends of Lamplighter's Marsh
117	Wesley Action Group
118	Woodland Trust
119	Winter, Mark
120	Hughes, Matt
121	Moore, Dave

122	Passivhaus Trust Team
123	Baker Ruff Hannon LLP
124	Talbot, Frances
125	Sohi, Ahmad & Umar
126	Sohi, Khadija
127	Sharp, Oliver
128	Callas, Rebecca
129	National Custom and Self-Build Association
130	Always, Sue
131	Seymour, Joe
132	Ettle, Keith
133	Hall, Martyn
134	Rundle, Martyn
135	Rundle, Carol
136	Nason, Guy
137	Wall, Jerry
138	Rose, Martin
139	Gueneau, Simon
140	Swithbank, Lucy
141	Crawford, Ian
142	Buckland, John
143	Lanceley, N.F & S.E
144	Jensen, Rosemary & Brian
145	Preddy, Richard
146	Beeston, Penny
147	Edwards-Mlangwa, Ruth & Columbus
148	Fowler, Janet
149	Lemon, Pauline
150	Hobbs, Ghyslaine
151	Hollyman, Susan
152	Helton
153	Wilkins, Andy
154	Smith, Angela
155	Bonner, Lorna
156	Bond, Stephanie
157	Rosewell, Peter
158	Bond, Tom
159	Avery, Peter
160	Kelly, Jacob
161	Stanleigh, Kate
162	Allen, D K
163	Golding, Elizabeth
164	Dunn, Nathan

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

165	Sadler, Piers
166	Friedland, Lionel
167	Grenfell-Shaw, J.M
168	Rowe, Helen
169	Lloyd J Richard
170	Smithen, Sharon
171	Trimble, Beki
172	Wright, Peter and Rosemarie
173	Potter, Christina
174	Jackson, Christine and Stephen
175	Chipping Sodbury Cricket Club
176	Staniszewska, Gabriela
177	Jones, Nikki
178	Clifton, Nick
179	Craddy, Lizzy
180	Hunt, Ivete
181	Pales, James
182	Hunt, Reg
183	Winterbourne Cricket Club
184	Caple, Anna
185	de Deus Silva, Michele
186	Taverners Cricket Club
187	Patchway Cricket Club
188	Evans, Sian
189	Birkinshaw, John
190	Easton Cowboys Cricket Club
191	East Bristol Advice & Information Centres
192	Hoos Construction Ltd
193	Leigh, Jessica
194	Julia
195	Rowe, Linda
196	Bristol Food Policy Council
197	Griffiths, Malcolm & Julie
198	Bristol Malayalee Cricket Club
199	Knowle Cricket Club
200	AEK-BOCO Football Club
201	Timsbury Cricket Club
202	Hirst, Tania
203	Wintle, Avis
204	Adams, Ginny
205	Harvey, Rachael
206	Powis, Rebecca
207	Haley, Katy

208	Evans, Fiona
209	Crook, Lorna
210	Taylor, Martha
211	Rumsey, Sue
212	Stocks, Victoria
213	Kealy, Hannah
214	Woodward, Janet
216	Stirling, Charles
217	Lamb, Kean
218	Schoenmann, Julietta
219	Ring, Peter and Helen
220	Malbon, Kate
221	Powis, Harriet
222	Deane, Christopher
223	Jones, Garry & Margaret
224	Brown, Shirley
225	Moore, Gill
226	Rollings, Phil
227	Goulding, Chris
228	Halpenny, J
229	Chilcompton Sports Cricket Club
230	Russouw, Lauren
231	Hannan, Blaire
232	Brislington Cricket Club
233	Williams, Jacqueline
234	Thomas, Rita
235	Westin-super-mare Cricket Club
236	Williams, Andy
237	Halpenny, Julia
238	Pickles, Colin
239	Cleverdon, Gill
240	Weeks, Jenny
241	Freeman, John
242	Friends of Bellevue and Albion Road Park
243	Jenord, Susan
244	Crossette, Sophie
245	Gransden, Katie
246	Dormand, Claire
247	Spellward, Paul
248	Broomfield, Elaine
249	Friends of St Andrews Park
250	Sapoff, Gregory
251	Evans, Mark and Joanne & family

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

252	Bristol Tree Forum
253	Gill, Jack
254	Strickland, Susan
255	Granville, Clare
256	Templeton-Dudley, Natalie
257	Rose, Viviane
258	Williams, Joanna
259	Powell, Rich
260	Kearney, Chris
261	Swithinbank, David
262	Wickens, Russell
263	Smith, Paul
264	Yuill, Sally
265	Drozd, James
266	Ffrench, Louise
267	Goug, Wilma
268	Newrick, Debra
269	Sheather, Judith
270	Foster, Alison
271	Robson, Bob
272	Moroz, John
273	Highbury Residents' Association
274	Roberts, Rachel
275	Hucker, Jonathan
276	Passmore, Amy
277	Hayes, W W
278	Preece, Alan
279	Vandries, Nicola
280	Avonmouth Planning Group
281	Staniszewska, Teresa
282	Dove, Penny
283	Allt, John & Janet
284	Radford, John
285	Serle, Christopher
286	Bridgeford, Fraser
287	Clemence, Catherine
289	McDonald's Restaurants Ltd
290	Birchall, Tricia & Rob
291	15 Residents of Stoke Paddock Rd & Cheyne Rd
292	Complete Project Development
293	Smith, Philip
294	Frenchay Cricket Club
295	Blaikley, Alex

296	Wherlock, Ann
297	Martin, R
298	Bayly, Graham and Rachel
299	Taylor-Abreu, Olivia
300	Garland, Alex
301	Mayer, Susan
302	Henn, John and Christine
303	Humphreys, Chris
304	Webb, Sarah
305	Grant, Stuart
306	Nairn, Andy
307	Taylor, Alan
308	Watten, Nikki
309	Bristol Women's Voice & VoiceBristol
310	Burman, Matthew
311	Walker, Joanna
313	Adams, Kathy
314	Stride Brothers Ltd
315	Dunn, Emma
316	Totterdown Residents Environmental & Social Action
317	Goulandris, John & Abraham, Peter - Councillor
318	Wherlock, Alan
319	McMahon, Enda
320	Bentley, James
321	Bristol Food Network CIC
322	Gladman Developments Limited
323	Bohin, Sharon
324	Colledge, Lisa
325	Parish, John
326	Aburrow, Alan
327	Young, Ken and Anita
328	Wright, Julie
329	Delphin, Natalie
330	Denman, Alexandra
331	Ingram, Grace
332	Marshall, Peter
333	Sutcliffe, Zoe
334	Rosato, Beth
335	Hester, Aimee
336	Roberts, Cilla
337	Haynes, Richard
338	Thouless, Rod & Ruth

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

339	Bewley, Jeremy
340	Baker, Toby
341	Clarke, Robert
342	Jefferson, Camilla
343	French, Stephanie
344	Beard, Jasmine
345	Pugh, Sarah
346	Battiwalla, Isobel
347	Picton, Jason
348	Causton, Geoff
349	Gray, James
350	Cowley, Nick
351	Anderson, Chris
352	Prideaux-Ghee, Steve
353	Bell, Debbie
354	Cowley, Sue
355	Walker, Sophie
356	Rydon, Hilary
357	Adams, Claire, Adrian & Jessica
358	Holden, Hugh
359	Watson, Margaret
360	Wherlock, Paul
361	Green, Jon
362	Brant, Judith
363	Lewis, Oli
364	Baddeley, Adam
365	Ellison-Burns, Jane
366	Swinburn, Chris & Ghislaine
367	Bishopston Society
368	Bloxham, Andrew
369	Ford, Joanna
370	Ward, Claire
371	Beth, Liz
372	Extinction Rebellion
373	Hodgson, Dick
374	O'Kane, Mick
375	Lecomber, Angela
376	Prior, Patricia
377	Connor, Philips
378	Old Bristolians Westbury Cricket Club
379	Theatres Trust, The
380	Sharp, Anne
381	Wright, Graham

382	Hirst, Pete
383	Bedminster Down and Uplands Society
384	Gamsa, Helen
385	Smith, Deborah
386	Anderson, S
387	Sell, M.P
388	Harrison, K
389	Davies, Ella
390	Hotwells and District Allotment Association
391	Weale, Thomas
392	Dimambro, Anthony
393	Mellor, Felicity
394	Smyth, Jenifer
395	Moore, John
396	Templar, Linda
397	Breakspear, Richard
398	Stammers, Sophie
399	Harris, Robert
400	Clark, Kay
401	Railfuture
402	Mann, Michael
403	North Somerset Council
404	Slatton-Buell, Johanna
405	Clifton Downs Community Association
406	Lamb, K.M & M.J.E
407	Stone, Deborah
408	Parish of Holy Nativity
409	Newberry, Paul
410	Milton, Julie
411	Toogood, Jeremy
412	Swallow, John & Sheila
413	Hall, Louise
414	Stuart, Maria
415	University of Bristol Sustainability team
416	Breckels, Fabian - Councillor
417	Hood, Robert
418	Taylor, Hilary
419	Raymond - Barker, John
420	Taylor Wimpey
421	Aspect360 Ltd
422	Phillips, Tim

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

423	Hampton Park and Cotham Hill Community Group
424	Balfry, Graham
425	Threlfall, Mhairi - Councillor
426	Burt, Stephen
428	Newberry, Salpal
429	Chandos Neighbourhood Association
430	Main, David
431	Jones, Sue
432	Cook, Philip
433	Beare, Sally
434	Davies, Emma
435	Ah-tow, Ricky & Lesley
436	Chapman, Philip
437	Morris, Sam
438	Loney, Helen
439	LPC (Trull) Ltd
440	Yulia
441	Pill, Stephen
442	Sport England
443	Lumkin, Simon
444	Barry, Paul
445	Akers, Mike
446	BS3 Planning Group
447	Klein, Leonie
448	Emerson, Joyce
449	Freeman, Caius
450	Farrell, Martin and Mariette
451	Seymour, Adrian
452	Pearce, Thomas
453	Freeman, Rebecca
454	Williams, Maxine
455	Bostock, David
456	Symonds, Doreen
457	Clewlow, Charlotte
458	Johnson, Jonathan
459	Wallwork, Lucy
460	Weber, Maggie
461	Wilson, Amy
462	Sweet, Ian
463	Revell, Valerie
464	Hall, Edwin
465	Kelly, Joanne
466	Pearson, Simon

467	Mansfield-Williams, Ruth
468	Barnes, Luci Gorell
469	Clover, Julian
470	Geerah, Dan
471	Round, Nicola
472	Round, Mark
473	Poppy, Jenny
474	Pocock, Helen
475	Rogers, Louise
476	Dolphin, Nick
477	Wilton, Robert
478	Desai, Reethah
479	Shergold, Karen
480	Law, Christopher
481	Thorne, Sharon
482	Law, Emma
483	Sloggett, Katie, Tim and Oscar
484	Key, Daniel
485	Prior, Chris
486	Beesley, Rosa
487	Max Fordham LLP
488	University of the West of England
489	Cotham School
490	Cote Charity
491	Welding Industries Ltd
492	Conway, Mary
493	Langford, Anna
494	Mohan, Helen
495	Gwinnell, Keren and Tim
496	Hatton, Susan
497	Chadwick, Stephanie
498	Collier, Rosalind
499	Elwes, Gemma
500	Thompson, Alan
501	Tomas, F
502	Manor Woods Valley Group
503	Preece, Sheila
504	British Airways Pension Fund and Stargas
505	Lewis, Martine
506	Todd, Mary
507	Smith, Claire
508	Roe, Alan
509	Beauhill, Rosalind

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

510	Frith, Leanne
511	Rose, Martin & Elizabeth
512	Hawkey, Kate
513	Guy, Walter
514	Hicks, Kim
515	Hicklin, Clive
516	Woodward, Ian
517	Archard, A
518	Friends of St George Park
519	Butts, Alison
520	Roe, Patricia
521	Ross, Sheila
522	Corner, Ruth
523	Atkin, James
524	Galliford Try Partnerships
525	Hooper, Della
526	Wilton, Larissa
527	Gleeson, Tessa
528	Littlewood, Joan
529	Hewson, Sarah
530	Townsend, John
531	Pearson, Karen Elaine
532	Quartley, Kevin and Eddy, Richard - Councillor
534	Siebert, Ed
535	Parker, Julie
536	McCann, Gemma
537	Gaze, Lucy
538	Hiles, Margaret
539	Hiles, Andrew
540	Roddy, Dan
541	Southgate, Penny
542	Andrews, Michael and Janet
543	Bjoroy, Robin
544	Munoz, Claire
545	Weeks, Peter
546	Lewis, Alexandra
547	Gellett, Vivien
548	Clark, Rowland
549	Baker, David and Jenny
550	Hargreaves, Cathy
551	Bartlett, Catherine
552	Shinner, Michael
553	Roberts, Julie, Mike & Elijah

554	Boere, Jennifer
555	Cossons, Alison
556	Ruggles, Rowan
557	Smart, Robert
558	Williams, Jason
559	Bowtell, Paul
560	Weston, Mark - Councillor
561	Husbands, Maurice
562	Barraclough, Lorna
563	Mizen, Paul
564	Revelle, Tony
565	Williams, Gwen
566	Defries, Scott
567	Wallis - Langley, Benita
568	Coleman, Georgina
569	Sweet, Evan
570	Hope, Gary
571	Hawkes, Rycharde
572	Sweet, Paul
573	Talbot, Neill
574	Wyatt, Jonathan
575	Wyatt, Diana
576	Roberts, John
577	Shaun
578	Hughes, Ian and Maura
579	Quilter, Bruce
580	Buck, Brian
581	Morris, Graham, Councillor
582	Collings, Clara
583	Hayes-Allen, Nicola
584	Andrews, Gary
585	Bennett, Sharon and Young, Trisha
586	Pratley, C.J
587	Wall, Katharine
588	Catsis, Salvador
589	White, Jenny
590	Rocke, Andrew
591	Roberts, Joshua
592	Wilkie, Jane
593	Hargreaves, Brian
594	Thomas, Alison and Steve
595	Fletcher, Matthew
596	Zekaria, Yael

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

597	Eades, Jo
598	Prescott, Fiona and Little, Satch and Matilda
599	Aspin, Valerie
600	Shergold, Ian
601	Eastman, D & C.A
602	Hawkins, Cheryl
603	Clifton and Hotwells Improvement Society
604	Stoke Bishop Residents' Planning Group
605	Positive Impact through Community Housing
606	Roblin, Lauren & Lee
607	Bristol Parks Forum
608	Action for Balanced Communities Bristol
609	Wyatt, Len
610	South Gloucestershire Council
611	Southmead Development Trust
612	Bristol Civic Society
613	Adams, Ginny
614	Centre for Sustainable Energy
615	United Communities
616	Knowle West Future
617	Tinsley, Kevin
618	Wood, Andrew
619	Crest Nicholson South West
620	Tugman, S
621	Green Councillor Group
622	Portland Brown
623	Northern Slopes Initiative
624	Ford, Roger
625	Cook, Clare & Darren
626	LiveWest
627	Windmill Hill and Malago Community planning Group
628	BAE Systems
629	Kent, Tim - Councillor
630	Cook, Darren and Clare
631	Avon Capital Estates 1 LLP
632	Highways England
633	Cox, Philip
634	Gonzalez, E
635	Longhurst, Maddy
636	Hotwells and Cliftonwood

	Communit Association
637	Bristol Green Party Climate Emergency Group
638	National Grid Electricity Construction (National Grid)
639	Bristol Campaign Against High Rises, The
640	Yate, S
641	Day Group Limited
642	Coal Authority, The
643	PMG Services
644	Angel, David
645	Withers, Catherine
646	CPRE Avonside
647	Cubex Land Ltd
648	Dandara Ltd
649	Sweet, Robert & Stephanie
650	Applin, Mr & Mrs J
651	Hamm, Christine
652	Brimble, Peter G
653	Swift, Alan
655	Hengrove and Whitchurch Park Neighbourhood Forum
656	Firmstone Consortia One Ltd
657	Legal & General Property Ltd
658	Macpherson, Rory
659	Austin, Rachel
660	Audrey, Suzanne
661	O&H Properties Ltd
662	Beake, Delia and Alan
663	Hancock, R.J.T
664	Binding, Christopher
665	Balderson, Luba
666	Dempsey, Gerard
667	Light, Dave
668	Balderson, Nicholas
669	Kelly, Susan
670	King, Andrew
671	Urban Tranquility Development Ltd
672	Home Builders Federation
673	Heard, Conrad
674	Kitchen, Caroline
675	Walker, Mary & Nicholas
676	Dixon, Rob

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

677	Maestri, Emily & Family
678	Saunders, Sally
679	Moore, Antje
680	Boucher, Cheri
681	Taylor, Rona
682	McKibbin, Brian
683	Sweet, Jeremy & Natalie
684	Knight, Jennifer
685	Pickles, Ellie & Family
686	Totterdown Childrens Community Workshop
687	Harvey-Scholes, Calum
688	Radford, Liz - Councillor
689	Martin, Mr & Mrs
690	Dearden, Zoe
691	Vattenfall Heat UK
692	Harries, Christopher
693	Williams, Gareth
694	Potenza, Curzio
695	Cannell, Mark
696	Connolly & Callaghan Group
697	Sneyd Park Residents Association
698	Cheung, Anita
699	Lawrence, Catherine
700	Bedminster Green Campaign
701	Rowe, Robyn
702	Chavannes, David
703	Kindling Bristol
704	O'Rourke, Paula - Councillor
705	Fenton, Ryan
706	Farwell, Sue
707	Comerford, Jeremy
708	Elstob, Sue
709	Wessex Water
710	Dickie, George
711	Light, Alice
712	Couling, Andy
713	Lindsay, Callum
714	Payne, Bryony
715	Phelan, Paul
716	Williams, Bliss
717	Macintosh, Andy
718	Ridgeon, Sarah
719	Claresmith, Mrs

720	Thompson, Lucie
721	Payne, Jill
722	Acton-Campbell, Rob
723	Cheesman, Holly
724	BS10 Parks & Planning
725	Scott, Mark
726	Welham, Kathy
727	Payne, Alan
728	E & S Bristol
729	Hackett, Suzan
730	Fairhurst, Nathan
731	Cumberland Basin Stakeholder Group
732	Donald, Graham & Gillian
734	Macleod, Ewen
735	Dove, Michael
736	Lowe, Charlotte
737	Gollop, Geoffrey - Councillor
738	Budd, Leoni
739	Fairhurst, Linda
740	Coleman, Susan
741	Sheather, Keith
742	Gamlin, Roger
743	Williams, Nigel
744	Race Equality CORE
745	Reeson, Geoff
746	Foley, Mike
747	Gilbert, Antony
748	Heyer, Jenny
749	Kirk, Alistair & Rachel
750	Wolfenden, Sheila
751	Ford, Jennifer
752	Gorman, Carol
753	McLoughlin, Aileen
754	Gill, Emily
755	Lincoln, Susie
756	Collier, Derrick
757	Bennett, Martin
758	Brown, Krystyna
759	Lockett, Hannah
760	Rivers, Mary
761	Nicholls, Susan
762	Lynch, James
763	Hoyland, Laura

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

764	Beedell, Jo
765	Pople, Jo
766	Eaves, Susan
767	Evers, Nigel
768	Holmes, Sheila
769	Welham, Kathy
770	Malago Valley Conservation Group
771	Wood, Christopher & Helen
772	Hore-Ruthven, Sandy
773	Baker, Des
774	Pickersgill, Ruth - Councillor
775	Bloomfield, Elizabeth
776	Penrose, Gillian
777	Leach, Lynn & Alan
778	Night Watch Board
779	Evers, Lauren
780	Kennedy, Jon
781	Strand, Linnea
782	Crossette, Alexander
783	Bristol Association of Restaurants, Bars and Independent Establishments
784	Mockridge, Mr & Mrs
785	Peddie, Emma
786	Dimond, Jennifer
787	Gibbs, Abi
788	Harvey, B
789	Tiny House Community Bristol
790	Bristol Water
791	Ramblers' Avon Area
792	Bright Green Futures
793	Pride of Place – Hartcliffe, Withywood and Bishopsworth
794	Adblock Bristol
795	Bristol @ Night Subgroup
796	Wilson-Tucker, Roger
797	McCarthy, Kerry - MP
798	St Pauls Planning Group
799	Watkin Jones Group
800	Gamble, Charles and Awane, Atipoka
801	Highridge Forum Community Association
802	Bristol Friends of the Earth
803	Tippett, Wendy

804	Wickham, Stephen
805	Bristol Walking Alliance
807	Easton Ward local councillors and residents
808	Friends of Badock's Wood
809	Hawkins, Derek
810	Westbury on Trym Society
811	Plan-EL Neighbourhood Planning Group
812	Curo Group
813	Friends of Troopers Hill
814	Acton-Campbell, Susan
815	Consortium
816	VHML
817	Unit DX
818	LaSalle Investment Management
819	FREP (Knowle) Ltd
820	Natural England
821	Apsley House Capital
822	Sustainable Westbury-on-Trym
823	Business West
824	Kingsdown Conservation Group
825	CSJ Planning
827	Summix FRB Developments Ltd
828	NHS Property Services Ltd
829	Vence LLP and Ashton Gate Ltd
830	IM Land
831	SJ Honeyfield Properties Ltd
832	Green Path Investments Ltd
833	Patch, Jon
834	EconetiQ
835	Young, Christian
836	BBC Pension Trust Limited
837	Sustainable Britain Ltd
838	Transport for Greater Bristol Alliance
839	Frontdoor Properties Ltd
840	Akzo Nobel CIF Nominees Ltd
841	GE CIF Trustees Limited
842	Community Led Housing West
843	SMLP Bristol Partnership
844	Locality (Collated Locality's Bristol Members)
845	Bellway Homes Ltd
846	Yarlington Homes

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

847	Savory, M
848	Caridon Development and Bellatame Ltd
849	Persimmon Homes Wessex
850	Powell, Helen
851	Barratt Homes Bristol
852	Globe House Limited
854	Bristol Port Company
855	Lambert Smith Hampton's clients
856	Bedminster Energy Group
857	Hoare Lea
858	Building Design Partnership Limited
860	We Love Stoke Lodge
861	Landscape institute Sout West
862	Bristol Airport
863	UK Green Building Council
864	Sille, Eric
865	St. Modwen Developments Ltd
866	Redrow Homes and Newcombe Estates
867	Bristol Energy Network
868	Locate Developments Limited
869	James, David
870	South West HA Planning Consortium
871	South Bristol Business
872	Taupo Group Ltd
873	Thriving South Bristol Group
874	Industrial Properties (Barton Hill) Ltd
875	Fusion Students LLP
876	Unite Students
877	Knight Frank Investment Management
878	RIBA SW
879	YTL
880	Lockleaze Residents Planning Group
881	LaSalle Investment Management
882	A2Dominon
883	Dundry and Hartcliffe Wildlife Conservation Group
884	Knowle West Media Centre & We Can Make
885	Redcliff Quarter MCC LLP

886	Crest Strategic Projects
887	University of Bristol
888	Persimmon Homes Severn Valley
889	First West of England
890	Telereal Trillium
891	Bristol Alliance Limited Partnership
892	Square Bay (Property) Ltd
893	Sovereign Housing Association
894	Buckler, Luke
895	Tincknell, Estella and Kirk, Gill - Councillors
896	BuroHappold Engineering
897	Geary, Sue
898	Marsh, Mary & Marie
902	Chidgey, Matthew
903	Bath &North East Somerset Council
904	Ashley Vale Action Group
905	South West Transport Network
907	Stevens, Clive - Councillor
908	Llewellyn, Tom
909	Bristol Tree Forum
913	Jardine, Philip
914	Bonner, Roger
915	Jones, Anita
916	Jones, Peter Clive
917	Pick, Michele
918	Thomas, Andrea
919	Evely, Susan
920	Elderton, Richard
921	Davey, Anni
922	Callow, Gillian
923	Deeley Freed Estates and Sydney Freed (Holdings)
924	Elderton, Pamela
925	Davey, Reginald
949	EnergieSprong UK
950	Wood, Matt
952	Paul Amos
953	Sell Ann
954	Smith Jean
955	Quilter, Jo
956	Historic England
957	Stokes Croft Planning Group

Bristol Local Plan Review consultation March 2019
Summary of consultation responses

958	Nash Partnership
959	Claverton Healthcare Ltd
961	Swan, Andrew
962	German, P
963	Bristol Disability Equality Forum
964	Environment Agency
965	McCann, Linda
966	Cantle, Tom
967	Batley, Wendy
968	IQ Student Accommodation

