



Bristol Local Plan Review Further Consultation November 2022 Summary of consultation responses

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Introduction to this summary

Overview

Bristol City Council (BCC) held a period of Further Consultation on both its Draft Policies and Development Allocations document (2022) and Housing Needs Paper (2022) between 28 November 2022 and 20 January 2023. 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 both documents and what they ought to contain.

Representations received will be taken into account by Bristol City Council and will be used to inform publication of the Local Plan (Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012).

Consultation Responses

A total of 449 responses were received in response to the Further Consultation.

Of these responses, 412 were within the scope of the consultation and 37 were beyond the scope of the consultation. Responses containing comments beyond the scope of the consultation include those relating to policies in the Bristol Local Plan Review Draft Policies and Development Allocations Consultation (March 2019) and comments about sites that are not set out for allocation in the Draft Policies and Development Allocations document (2022).

The 412 responses resulted in 2,041 individual comments on the various elements of the Draft Policies and Development Allocations document (2022) and Housing Needs Paper (2022).

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

The tables below summarise the comments made by each respondent, against each draft policy included in the Draft Policies and Development Allocations document (2022) and the Housing Needs Paper (2022). The respondent reference number is detailed in the right-hand column of the table.

Where a policy is more detailed and covers a number of distinct topics or themes, comments have been summarised accordingly. It should be noted that a respondent may have made multiple comments on the draft policies.

All comments received in response to the Further Consultation have been categorised as being 'in support of', 'objecting to' or 'unclear'. The unclear category (i.e. neither in support nor objection) has been used for responses which are not clearly in support of or objecting to the draft policies and where minor clarifications or changes are sought.

Structure of this report

The report has been prepared to mirror the structure of the Draft Policies and Development Allocations document (2022).

The appendices included in the Draft Policies and Development Allocations document (2022) have been summarised in this report, alongside the policies to which they are most relevant. The same approach has been taken for the Housing Needs Paper (2022).

Therefore, the approach to summarise these elements is to group them as follows:

- Appendix 1: Bristol housing need and requirement and Housing Needs Paper (2022) – Draft Policy H1: Delivery of new homes – Bristol’s housing requirement.
- Appendix 2: Local centres and parades – Draft Policy SSE1: Supporting Bristol’s centres – network and hierarchy¹.
- Appendix 3: Local design guidance – Draft Policy DC A: Delivering well-designed, inclusive places.

It should be noted that no responses were received from the statutory bodies and partnerships in relation to policies NZC3, SSE2, SSE3 and SSE6 as well the plan’s proposed approach to amendments to the Green Belt boundaries in Bristol.

¹ Please note that no respondents submitted comments that specifically refer to Appendix 2. Where comments have been made in relation to the individual centres of Bristol, these have been summarised against draft policy SSE1 which sets out the network and hierarchy of the city’s centres.

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1. About the Local Plan Review

Overview: In total, 53 respondents made 58 comments on the 'About the Local Plan Review' section. This includes 31 general comments about the contents of the Draft Policies and Development Allocations document (2022) that were not made against any one specific draft policy or section of the document. Key themes are identified below.

Table 1 Summary of consultation responses

Key Themes	Respondent Reference
<p>General comments about the contents of the Draft Policies and Development Allocations document</p> <p><i>Comments in support (3):</i> One respondent supports the stronger focus on climate and sustainability, and notes the policy support for local economies and amenities. Another respondent supports the ambitious nature of the approach to climate change. One respondent suggested continued working with Bristol City Council to align the Draft Policies and Development Management Allocations document with the Fish Recovery Strategy/Action Plan and the Bristol Avon Catchment Plan.</p> <p><i>Comments objecting (7):</i> Seven respondents note general objection to the Draft Policies and Development Allocations document, for the following reasons:</p> <ul style="list-style-type: none"> • More information is needed to understand how the policy relates to central government plans and national policies. • The focus on housing within the Draft Policies and Development Allocations document means that the other objectives, such as the Net Zero Carbon Development policies, will be subservient. To address this, housing targets should be better integrated with the suite of policies in the plan. • Climate change policies need to be supported by viability evidence. To ensure proposals remain viable, these policies should be both more flexible and potentially site specific. • The Draft Policies and Development Allocations document is in conflict with the National Planning Policy Framework (NPPF) as it prioritises some elements of sustainable development, such as brownfield sites and nature conservation, over others. A further comment suggested that the document prioritises housing, transportation and economic growth over nature conservation. • The document does not contain a strategy for Bristol's neighbourhoods, nor is there updated strategic text for different areas of Bristol. • The Draft Policies and Development Allocations document no longer allocates some greenfield sites for housing, despite BCC previously having recognised this as necessary. • A sub-regional approach developed in combination with neighbouring Local Planning Authorities (LPAs), as set out in the Spatial Development Strategy, would be preferable to an individual Local Authority approach. • The document does not account for new and emerging policy or legislative change (such as that set out in The Levelling-up and Regeneration Bill: Reforms to National Planning Policy (December 2022) or the Environment Act 2021) which afford greater protection to green infrastructure, trees, and green and open spaces. 	<p>126, 223 269, (support)</p> <p>80, 110, 117, 130, 168, 207, 274 (object)</p> <p>1, 7, 77, 89, 108, 114, 139, 147, 152, 155, 177, 210, 234, 378, 421, 425, 432 (neither in support nor objection)</p>

<p><i>Comments neither in support nor objection (17):</i> Several respondents made comments that were neither in support nor objection, as follows:</p> <ul style="list-style-type: none"> • The Draft Policies and Development Allocations document should not be delayed as a result of changes proposed through the NPPF. • Another respondent queries how the plan relates to national policies including those set out in the NPPF. • One respondent notes that the plan period is not clear. • Two respondents suggest the inclusion of new policies; one relating to the safeguarding of existing and new renewable energy resources; and, one relating to older people's housing, which would include establishing the overall need for this type of housing and setting a benchmark target. • One respondent suggests adopting a regenerative settlement framework at a citywide scale and for greenfield / Green Belt sites. • Another respondent queries whether the existing policies in the adopted Core Strategy and Site Allocations and Development Management Policies document relating to shopping are to be retained (as was indicated in 2019 consultation) or replaced by the policies in the Draft Policies and Development Allocations document. • Another respondent states that the findings of the West of England Employment Land Spatial Needs Assessment should be reflected in future policy development. This respondent also states that there is a lack of clarity regarding whether BCAP11: <i>University and Hospital Development</i> of the Bristol Central Area Plan and Supplementary Planning Document (SPD) 11: <i>University of Bristol Strategic Masterplan</i> will be retained. • One respondent states that the Local Cycling and Walking Infrastructure Plan and any subsequent revisions needs to be formally incorporated into the Draft Policies and Development Allocations document in order to safeguard land for active travel provisions. • Another respondent notes that the document should enable a pragmatic and expedient approach to the delivery of education schemes. • Three respondents state that the policies included in the Draft Policies and Development Allocations document should be strengthened by replacing the word 'should' with 'must'. • Another respondent notes that flexibility needs to be built into policies, so that evolving issues relating to climate change can be addressed, and that vulnerable people should not have to pay a premium for climate change mitigation or adaptation measures. This respondent also notes that policies will need to be sufficiently enforced and planning officers given appropriate resource and training to make informed decisions. 	
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<p>Comments about process of the Local Plan Review and consultation</p> <p><i>Comments objecting (29):</i> The following reasons are given for objecting to the process of the Local Plan Review and consultation:</p> <ul style="list-style-type: none"> • The document is overly long and difficult to read and therefore is not accessible to all members of the community including: homeless people, those without access to the internet, and those for whom English is not their first language. • The Further Consultation does not present a consolidated version of the Draft Policies and Development Allocations document and the associated evidence base. This includes Sustainability Appraisal and Viability Assessment work. The full version of the Draft Policies and Development Allocations document and full range of evidence base documents will only be viewed by the public for the first time at the Regulation 19 stage, which the respondent considered will be too late for effective consultation. • It is challenging to understand how this document fits with the previous consultation in 2019, what changes have been made since then, and how the responses from the 2019 consultation have been reviewed and incorporated. • The development capacities of sites and areas of growth and regeneration included in the 2019 consultation should have been reviewed to ensure that approach previously set out is still appropriate. <p><i>Comments neither in support nor objection (2):</i> Two comments were received from statutory consultees, with further detail provided in the next table in this report.</p>	
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Overview: In total, six statutory bodies and partnerships made comments regarding the ‘About the Local Plan Review’ section. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 2 Comments from statutory bodies and partnerships

Consultee	Reference
General comments about the Local Plan Review	
Marine Management Organisation: Respondent states that as a document with potential to affect the UK marine area, the Local Plan should have regard to the UK Marine Policy Statement and South West Marine Plan.	Ref 7
Sport England: Respondent suggests that the plan should include a policy on active design. Respondent has included a model active design policy for guidance.	Ref 89
Network Rail: Respondent recommends the inclusion of a new freight policy for a non-specific freight requirement in Avonmouth.	Ref 114
Comments about process of the Local Plan Review and consultation	
Environment Agency: Respondent states that clarity is needed about the implications of the failure to progress the Spatial Development Strategy for the emerging Local Plan and Duty to Co-operate.	Ref 218
North Somerset Council: Respondent states that the plan should clarify that North Somerset is not part of the West of England Combined Authority and was not a party to the Spatial Development Strategy.	Ref 463
South Gloucestershire Council: Respondent notes the ambition of BCC to have the Regulation 19 stage of its Local Plan published by Summer 2023 before it is submitted to the Secretary of State by the target date of late 2023. Respondent	Ref 465

seeks assurance that sufficient technical evidence and cross boundary liaison will be undertaken ahead of the Regulation 19 Submission Plan being published.	
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2. Vision: building a better Bristol

Overview: In total, 57 respondents made 84 comments regarding the Vision. Key themes are identified below.

Table 3 Summary of consultation responses to elements of the Vision

Key Themes	Respondent Reference
<p>General comments about the Vision</p> <p><i>Comments in support (5):</i> Four comments note general support for the aspirational nature of the vision, including the promotion of Bristol as a place where inequality and deprivation are narrowed and there is an increasing focus on affordable homes. One of these respondents (Lawrence Weston Neighbourhood Planning Forum) notes that the vision aligns with that defined for their neighbourhood area. One of these respondents states that they agree with the approach of incorporating rapid transit systems in the plan area.</p> <p><i>Comments objecting (9):</i> Several comments refer to the need for the focus of the vision to be strengthened in relation other issues, such as: climate change, transport, health and well-being and communities and education. One of these comments objects to the period of time covered by the vision, stating that it does not need to extend beyond the plan period.</p> <p>Two respondents object to the number of homes set out in the vision. These respondents make reference to need for the housing figures included in the overarching vision to align with those included in the objectives of the Plan. These respondents also refer to the potential difficulties of addressing inequality and deprivation if housing need is underestimated.</p> <p>One comment states that the vision should not refer to the One City Plan, given that the document could be disregarded by an incoming administration for Bristol.</p> <p><i>Comments neither in support nor objection (32):</i> Twenty comments state that they do not support the development of new rapid transit systems in Bristol. Some of these comments state that the rapid transit systems need to be further defined in the vision and others state that the focus should be on improvements to, and extensions of, existing sustainable and active transport networks.</p> <p>Eight comments state that the vision could be expanded to include reference to additional issues including:</p> <ul style="list-style-type: none"> • delivering housing to support life-long living; • prioritising the use of derelict buildings, rather than building on greenfield land; • prioritising good design and protection of the city's heritage; • provision of open space and public realm; • promoting the delivery of high-quality infrastructure; • promoting employment and higher wages; and • promoting a healthy living environment. <p>One comment notes the reference in the vision to the delivery of 2,000 homes a year across the city, but acknowledges that housing delivery in Bristol has been</p>	<p>142, 146, 150, 223, 255 (support)</p> <p>80, 105, 117, 127, 147, 228, 234, 292, 392 (object)</p> <p>3, 29, 33, 35, 41, 42, 48, 49, 65, 67, 71, 79, 99, 122, 129, 134, 136, 154, 157, 176, 177, 183, 191, 195, 202, 215, 219, 265, 362, 368, 451, 465 (neither in support nor objection)</p>

below targets in recent years. A further comment on the vision states that the term 'urban living' needs to be better defined.	
<p>Comments in relation to the Objectives included in the Vision</p> <p><i>Comments in support (2):</i> Two respondents support the importance given to climate change and net zero in the Objectives. One of these respondents notes the commitment to address both the climate emergency and ecological emergency, that have been declared in Bristol.</p> <p><i>Comments objecting (5):</i> One comment states that the plan puts the objective of meeting the development needs of the city above the need to address the climate and ecological emergencies and objects to this. Another comment states that the Objectives should include a greater emphasis on the growth of the education sector. Two respondents state that the Objectives should be clear on how the needs of all residents will be met and housing targets will be achieved. One of these respondents state that the focus on the development of brownfield sites will not provide the required level of new homes including affordable homes.</p> <p><i>Comments neither in support nor objection (5):</i> Three respondents note the potential for the Objectives to refer to additional themes, including parks and green space, the economy and jobs, and a healthy environment.</p>	<p>108, 113 (support)</p> <p>99, 117, 127, 157, 234 (object)</p> <p>136, 142, 191, 208, 265 (neither objecting nor in support)</p>
<p>Comments in relation to the Aims included in the Vision</p> <p><i>Comments in support (12):</i> Many of the comments express general support for the aims of the plan. Elements supported include:</p> <ul style="list-style-type: none"> • prioritising the development of brownfield land; • promoting the creation of well-designed places; • achieving carbon net zero; • promoting better air quality and increased tree canopy; • creating communities with access to affordable homes, open spaces, food growing and diverse and vibrant centres to help achieve the concept of a 15-minute city; and • managing the development of student accommodation. <p><i>Comments objecting (4):</i> The majority of respondents objecting to the aims make reference to the approach to housing. One respondent states that housing development is given too much weight in the Aims, and that health and wellbeing and the environment should instead be prioritised.</p> <p>One of the comments received states that a strategy focussed on brownfield development will mean that the housing requirements for Bristol are unlikely to be met. One comment objects to the aims, stating that they would not be met given that the required level of housing is unlikely to be delivered over the plan period.</p> <p><i>Comments neither in support nor objection (10):</i> Two respondents note the focus of development on brownfield sites in the aims. These respondents state that a strategy for housing development focussed on brownfield sites needs to be aware of potential for impacts on heritage assets, as well as the competing demands for employment uses and green space provisions. One of these</p>	<p>15, 66, 88, 113, 129, 150, 183, 207, 213, 215, 265, 362 (support)</p> <p>99, 117, 127, 157 (object)</p> <p>49, 78, 80, 89, 136, 154, 191, 208, 234, 425 (neither in support nor objecting)</p>

<p>comments also notes the need for an additional aim of promoting cross working between all BCC teams.</p> <p>Three comments refer to the term ‘urban living’ included in the aims. Two of these comments query whether the promotion of urban living will have adverse implications for suburban character and the retention of employment land in Bristol. One comment states that the term needs to be better defined.</p> <p>One respondent notes that the aims reference support for food growing in the city, and suggest an additional aim is included in relation to achieving the enhancement of open spaces.</p> <p>One respondent notes the inclusion of the aim relating to meeting the need for student accommodation but states that this must be framed in relation to the potential for harmful impacts.</p> <p>Another respondent notes the importance of the aims included in Plan but states that they will be difficult to achieve if the employment and economic needs of the city are not sufficiently addressed.</p>	
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Overview: In total, seven statutory bodies and partnerships made comments regarding the vision, including aims and objectives. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 4 Comments from statutory bodies and partnerships

Consultee	Reference
General comments about the Vision	
National Highways: Respondent supports the reference to sustainable transport within the overall vision.	Ref 142
Historic England: Respondent states that reference should be included to the importance and relationship of the historic environment in relation to the city’s net zero commitment, its prosperity, place shaping and civic pride and well-being.	Ref 157
Bath and North East Somerset Council: Respondent states that the vision should reflect the potential requirement for new homes to be met outside the city boundary..	Ref 228
South Gloucestershire Council: Respondent notes support for the focus on reducing inequality and deprivation through the delivery of homes and a rapid transit system, but states that evidence on how BCC considers that this will be achieved should be provided. Respondent also notes support for the approach of creating a quality healthy environment and attractive open spaces, but highlights that there is no specific mention in the vision to the importance of ecology or biodiversity.	Ref 465
Comments about the Objectives of the Vision	
National Highways: Respondent notes the challenge of meeting the housing objective of delivering 1,925 per annum up to 2040, and the objective of exceeding this target where infrastructure can unlock additional potential.	Ref 142
Historic England: Respondent states that an objective relating to the historic environment should be included.	Ref 157
Natural England: Respondent suggests that a target could be included for greenspace provision and improving access to greenspace.	Ref 208

Comments about the Aims of the Vision	
Sport England: Respondent refers to the aims of achieving the concept of a '15-minute city', achieving good design and protecting valued open space. Respondent notes the potential synergy between these aims and the provision of facilities and opportunities for sport. Respondent links this approach to the aim of achieving active design. It is also stated that there is cross over with the Town and Country Planning Association (TCPA) '20-minute neighbourhood' concept.	Ref 89
Historic England: Respondent states an aim relating to the historic environment should be included.	Ref 157
Natural England: Respondent notes support for prioritising the development of brownfield land but states that it is important to recognise that some brownfield sites can be important for biodiversity. The plan should protect brownfield sites with high value for biodiversity. An additional aim relating to all parts of BCC working together is needed, including parks and greenspaces, ecology, flood risk, public health, and transport.	Ref 208

3. Draft Policy H1: Delivery of new homes – Bristol’s housing requirement Housing need and requirement

Overview: In total, 105 respondents made 167 comments regarding policy H1. Key themes are identified below.

Table 5 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy H1: Delivery of new homes – Bristol’s housing requirement</p> <p><i>Comments in support (11):</i> Six respondents are generally supportive of the policy approach to the promotion of development to meet Bristol’s housing needs within the boundaries of the city or on brownfield land.</p> <p>Three respondents note support for the supporting text of the policy to exceed housing delivery targets by offering a large range of potential development sites, areas of growth and regeneration and a variety of policy interventions. Two comments (including the comment from the Home Builders Federation) support the approach to deliver more than the annual average number of homes in the early part of the plan period, rather than backloading delivery.</p> <p><i>Comments objecting (24):</i> Four comments object stating that the policy should consider the delivery of housing adjacent to the current urban area, regardless of whether it falls within surrounding local authorities. These respondents state that the policy does not provide enough detail about how BCC has engaged with its neighbours on this issue. One of these comments and two additional comments state that the detail of any engagement with Bristol’s neighbouring authorities should be provided in the context of the local housing need figure, the assessment of housing capacity for the city and any resultant shortfall that would be met by neighbouring Local Planning Authorities (LPAs). Another of these comments states there should be a yearly review of housing need for the city.</p> <p>Another comment also notes the absence of the local housing need figure and states that the policy should cover the plan period of 2022-2040. The policy only details the annual average minimum delivery from 2023 to 2040. This respondent states that the phasing approach set out will lead to a decline in housing delivery after 2027, which is not in line with BCC’s goal of exceeding the minimum target for housing delivery.</p> <p>Twelve comments object to BCC proposing that neighbouring LPAs should be used to make up for Bristol's shortfalls in meeting its own housing requirements.</p> <p>One comment suggests that the policy is drafted in a way that will support profits for developers and not meet the needs of local people. This comment also states that delivering higher housing numbers will encourage inward migration. Two comments state that the suggestion in the supporting text that housing supply in Bristol can affect price should be removed.</p>	<p>66, 146, 180, 181, 196, 197, 198, 202, 254, 256, 261 (support)</p> <p>29, 35, 41, 42, 48, 49, 67, 79, 80, 92, 99, 110, 119, 120, 122, 127, 132, 133, 134, 143, 146, 149, 151, 368 (object)</p> <p>46, 71, 91, 113, 121, 129, 136, 139, 150, 154, 155, 156, 157, 164, 171, 182, 184, 206, 215, 218, 234, 260, 265, 284, 292, 345, 352, 353, 354, 355, 371, 406, 414 (neither in support nor objecting)</p>

Two respondents state that the policy suggests that higher densities of development will be acceptable in the city which could have implications for the established character of some of the long established residential neighbourhoods.

Comments neither in support nor objection (33): Nine comments state that the use of boats as homes could help to increase the supply of affordable homes in central locations.

Four comments note the potential for impacts on services, facilities and open spaces of Bristol as a result of the level of housing proposed over the plan period, with potential implications identified for health and wellbeing, air quality, character and mitigation of and adaptation to climate change. One of these comments and five further comments question whether the policy adequately considers the accommodation needs of students and older people. One respondent notes concern about the level of student housing already in the city. This comment and an additional comment suggest that the policy should do more to encourage the development of housing on brownfield sites.

Two respondents note the approach of the policy to deliver housing above the stated target, where it is supported by service and infrastructure capacity, and suggests this could relate to many locations in the city. These respondents suggest that additional clarity is required in relation to this approach. One comment states that housing delivered outside of the city's immediate catchment area will need to be supported by transport links and health and social care services.

Two respondents state that the housing needs of the city should be considered in the context of the number of currently vacant homes. Two comments (including from the South West Housing Planning Consortium) state that updates to the policy could include support for the delivery of housing to meet the needs of specific groups. It is stated that this could include affordable homes for which a specific target should be included up to 2040.

One comment notes the focus of the housing strategy on the delivery of new and affordable housing. This comment states that excessively onerous development management requirements may adversely affect the delivery of new housing in the city, including affordable homes. One comment suggests that the policy should include a caveat relating to the Plan's proposed aspiration for optimising capacity at central areas, clarifying that this could include the accommodation of tall buildings.

One respondent suggests that the approach to the delivery of housing needs to be explicitly framed in the context of sustainability.

Another respondent states that there is a current imbalance between the supply and demand of housing in Bristol which has resulted in high rental pricing.

<p>Comments in relation to the housing delivery figures included in Draft Policy H1</p> <p><i>Comments objecting (38):</i> Nine respondents object to the housing requirement included in the policy, stating that it is too high. Specific reasons for objection include:</p> <ul style="list-style-type: none"> • The amount of development would result in a high level of both carbon emissions and embodied carbon and the preferred approach should be to reuse/repurpose existing assets. • The proposed level of housing growth is too large in relation to existing size of Bristol and the minimum target for delivery should be subject to review every 1-2 years. • There is no evidence to suggest that requiring local housing targets can address housing affordability. • The housing requirement would result in densities that are out of character with the city. • No housing requirement should be included as this will encourage unsuitable and environmentally damaging developments. • Reference should be made to the Secretary of State’s December 2022 letter to Council Leaders in England which states that “housing targets should not be used as a justification to grant permission”. <p>Twenty-seven respondents object to the housing requirement included in the revised draft policy stating that it is too low. The reasons for objection include:</p> <ul style="list-style-type: none"> • The approach is based on a calculation of capacity for housing in Bristol and is a departure both from the Government’s standard method and the requirement to include a 35% uplift in urban centres. It fails to adequately address the local housing need. • Including a capacity-based target for housing delivery may mean development is not controlled by specific allocation policies, and could contribute to a trend towards taller buildings which are less able to meet the needs of local people. A more ad hoc approach to development could also reduce the local supply of employment land, contribute to loss of open space and result in a lower level of new open space provision. • The housing delivery figure included in the draft policy is below both the standard method calculation and the capacity assessment undertaken on behalf of BCC. • The proposed housing delivery figure should be higher to support the delivery of more affordable homes and improve housing affordability. • The proposed housing delivery figure will contribute to development that is less well related to Bristol and to longer commuter journeys, thereby undermining BCC’s carbon neutral agenda. • There is no evidence in the Plan that 10% of the housing requirement is being delivered on sites of less than 1 hectare, as per Paragraph 69 of the NPPF. • The housing delivery figure should be considered alongside the needs of the employment and education sectors. <p>As part of the responses which state that the housing delivery figure in Draft Policy H1 is too low, respondents made the following related points:</p>	<p>49, 78, 80, 92, 93, 99, 117, 118, 119, 127, 130, 131, 132, 139, 147, 150, 151, 152, 153, 162, 165, 166, 167, 168, 171, 184, 185, 191, 193, 194, 197, 200, 201, 226, 234, 320, 362, 463 (object)</p> <p>41, 75, 110, 228, 465 (neither in support nor objection)</p>
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<ul style="list-style-type: none"> • The Draft Policies and Development Allocations document (2022) proposes fewer site allocations than those included in the Bristol Local Plan Review Draft Policies and Development Allocations Consultation (2019). • Engagement is needed between BCC and its neighbouring LPAs to decide on the level of housing to be accommodated in neighbouring areas to help meet Bristol's unmet need. This is particularly the case in light of the withdrawal of the West of England Joint Spatial Plan and abandonment of the West of England Spatial Development Strategy. • Further evidence should be supplied to support the housing delivery figure included in the policy, including an Urban Capacity Assessment, Green Belt review, Sustainability Appraisal, site assessment evidence base, and housing trajectory (this includes the comment from the South West Housing Association Planning Consortium). • A focus on brownfield land to meet housing need is unlikely to be viable given recent lower delivery rates where there has been an emphasis on brownfield sites in the city (this includes the comment from the Home Builders Federation). <p><i>Comments neither in support nor objecting (5):</i> Two respondents question whether there is adequate land available to accommodate the delivery of the 1,925 homes set out in the plan for each year. One of these respondents states that this figure is overly optimistic given that the churn of redevelopment sites available will inevitably reduce over time.</p> <p>One respondent suggests that the figure for the number of homes that can be delivered in Bristol each year, should include repurposed, previously derelict buildings.</p>	
<p>Comments in relation to Appendix 1: Bristol housing need and requirement</p> <p><i>Comments in support (1):</i> One comment supports the approach set out in Appendix 1 which seeks to establish whether the city's housing development needs that cannot be met wholly within Bristol could be met elsewhere.</p> <p><i>Comments objecting (3):</i> One comment states that there is some uncertainty in the supply of housing set out in the Appendix. This notes that much of the land is brownfield and contains non-residential uses, which would reduce housing capacity. This comment also highlights the reference in the Appendix to the release of Green Belt, noting that approach is not yet supported by the exceptional circumstances needed to alter the Green Belt boundary.</p> <p>Another comment objects because the Appendix suggests that 4,500 homes would come forward on small sites as windfall development. The NPPF requires 10% of the overall housing requirement to be provided on small sites, and as such, a breakdown of the land supply for Bristol should be included to demonstrate that this is going to be achieved in the plan area.</p> <p><i>Comments neither in support nor objecting (2):</i> One comment notes the dwelling completion figures presented and states that the figures indicate that the Core Strategy's housing policies have limited the housing industry's appetite for further growth in Bristol.</p>	<p>150 (support)</p> <p>119, 147, 194 (object)</p> <p>120, 228 (comments neither in support nor objection)</p>

<p>Comments in relation to the Housing Needs Paper</p> <p><i>Comments in support (25):</i> The majority of comments (22) note support for the approach of deviating from the Government's standard method for calculating local housing need and instead relying on a locally specific evidence base. These comments also support the approach of disregarding the 35% uplift in housing numbers attributed to urban centres. The reasons for supporting the approach include:</p> <ul style="list-style-type: none"> • reducing the potential for urban sprawl; • reducing the potential for adverse effects of higher levels of new housing on the environment, including loss of green space; and • making use of empty buildings before allowing for a higher level of new development. <p>One further comment supports the assertion in the Housing Needs Paper that trends in the growth of the student population are likely to continue and will result in demand for purpose-built student accommodation and in turn impact the mix of housing needed in Bristol.</p> <p><i>Comments objecting (24):</i> The majority of the respondents objecting (17), including the comment from the Home Builders Federation, state that the Housing Needs Paper does not sufficiently set out the exceptional circumstances necessary for BCC to depart from the Government's standard method when calculating its housing need. Three of these respondents state that the calculation of need for student housing is based on assumptions regarding the student population rather than evidence from the city's further education providers. Three more of these respondents state that the paper does not consider the relationship between the city and surrounding administrative areas. One respondent states that the paper does not adequately deal with the issue of affordability.</p> <p>One comment states that the method for calculating housing need in the paper is unclear and depends on evidence that is still being prepared. Another comment states that there is an error in the paper on page 2 where it reports that the 10-year period which the standard method calculation covers runs between 2022 and 2023.</p> <p>Four respondents state that the housing needs of older people and students have not been adequately considered in the paper.</p> <p><i>Comments neither in support nor objection (1):</i> One comment is from a statutory consultee, with further detail provided in the next table in this report.</p>	<p>15, 29, 33, 34, 41, 42, 48, 49, 67, 71, 79, 80, 122, 134, 146, 155, 172, 191, 207, 217, 228, 288, 292, 368, 465 (support)</p> <p>4, 88, 91, 92, 99, 104, 109, 117, 119, 120, 121, 132, 139, 147, 151, 152, 153, 166, 167, 171, 184, 194, 200, 234 (object)</p> <p>463 (comments neither in support nor objection)</p>
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Overview: In total, six statutory bodies and partnerships made comments regarding Draft Policy H1. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 6 Comments from statutory bodies and partnerships

Consultee	Reference
General comments about Draft Policy H1: Housing need and requirement	

Historic England: Respondent states that the aim of making best use of existing development allocations for more homes is likely to result in higher densities and increase the potential for taller buildings. This approach should be caveated to prevent inappropriate forms of development.	Ref 157
Environment Agency: Respondent states that reference should be included to flood risk as a constraint in relation to the need for new housing.	Ref 218
Comments about the housing numbers included in Draft Policy H1	
Homes England: Respondent states that the targets included in Draft Policy H1 are 600-700 homes per annum below BCC's own housing need as estimated in the Housing Need Paper. They are also below the standard method requirement. Respondent also notes that the withdrawal of the West of England Joint Spatial Plan and abandonment of the Spatial Development Strategy means that there is a need to demonstrate how cooperation with neighbouring authorities will address the deficit in housing numbers. Respondent further highlights the under delivery of market and affordable housing in Bristol for several years and the effect this has in relation to affordability in the city.	Ref 194
Bath and North East Somerset Council: Respondent notes that the housing numbers included in Draft Policy H1 are less than the local housing need, established both through the standard method (including the required 35% uplift) and in BCC's Housing Needs Paper. In relation to this shortfall, Bath and North East Somerset will consider their scope for any contribution to meeting the residual unmet need. Bath and North East Somerset suggests that at Regulation 19 stage for the plan, BCC will need to be able to demonstrate that it is maximising its urban capacity towards meeting its housing need and that the assumed capacity for the city will be required to be demonstrably deliverable and viable.	Ref 228
North Somerset Council: Respondent notes that Draft Policy H1 identifies that 1,925 homes per year by 2040 can be met within the administrative boundary of Bristol. This appears to leave an unmet need, which the policy states will be met through work with neighbouring authorities. Respondent states that it is important that BCC explores opportunities to meet its need within its own administrative boundary, and then the wider WECA area. This should include maximising vacant and underused land, optimising densities and utilising all suitable greenfield sites. These options should be explored before considering the ability of North Somerset to accommodate any residual need given its own challenging housing target.	Ref 463
Comments about Appendix 1	
Homes England: Respondent objects to the sources of deliverable capacity detailed in Appendix 1, stating that there is no certainty in relation to the proposed delivery strategy for housing and the supply of appropriate sites identified in the appendix. Respondent also states that there is no evidence provided on the suitability, deliverability and developability of sites that make up the housing supply.	Ref 194
Bath and North East Somerset Council: Respondent notes that the proposed minimum housing target included in Draft Policy H1 is based on an assessment of capacity within Bristol as explained in Appendix 1. As set out in Appendix 1, a significant proportion of the assumed capacity is to be delivered in 10 areas of growth and regeneration. Respondent states that more detailed evidence in the form of an updated housing delivery	Ref 228

trajectory needs to be presented at the Regulation 19 stage to support the urban capacity figure proposed. Respondent also notes the likely displacement of industrial and other employment uses from these areas of growth and regeneration and questions whether adequate provision has been made within Bristol for displaced uses, as well as to meet newly arising employment demand over the plan period. Given the importance of Bristol's economy to the Bath and North East Somerset area and the other surrounding authorities, it is requested that ongoing dialogue is undertaken on the approach to the economy.	
Comments about the Housing Needs Paper	
Homes England: Respondent objects because an alternative approach to the standard method has been used to calculate the housing needs of the city. It is considered that this approach is contrary to national policy and guidance, and no exceptional circumstances have been identified that justify this approach.	Ref 194
Bath and North East Somerset Council: Respondent states that the figure included in the Housing Needs Paper is more robust and evidence-based than that provided through the standard method. Respondent states that the 35% uplift applied through the standard method is unevidenced and that, in line with national policy, the Housing Need Paper has applied adjustments for market signals (i.e. affordability) and a deficit in supply from the Core Strategy period.	Ref 228
North Somerset Council: Respondent notes that the preparation of the Housing Needs Paper as evidence of local housing need of 52,000 dwellings, is opposed to the 67,520 dwellings required for the city using the standard method calculation.	Ref 463
South Gloucestershire Council: Respondent states that the figure included in the Housing Needs Paper is more robust and evidence based than that provided through the standard method. Respondent states that the 35% uplift applied through the standard method is unevidenced and that in line with national policy the Housing Need Paper has applied adjustments for market signals (i.e. affordability) and a deficit in supply from the Core Strategy period.	Ref 465

4. Draft Policy AH1: Affordable housing provision requirement

Overview: In total, 72 respondents made 110 comments regarding Draft Policy AH1. Key themes are identified below.

Table 7 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy AH1: Affordable housing provision requirement</p> <p><i>Comments in support (24):</i> The majority of respondents note general support for the principle of affordable housing. Many of these comments note that the benefits of affordable housing include helping to meet the needs of local residents and younger people, as well as addressing the high unaffordability of housing and general inequality. Several respondents supporting the policy stated that developers should not be able to avoid the requirement for the delivery of affordable homes, when considering other policy requirements relating to density as well as viability concerns. One respondent questioned whether alternative routes, such as the conversion of existing building stock, might be used to support affordable housing delivery.</p> <p><i>Comments objecting (1):</i> One comment states that they do not agree with the inclusion of an affordable housing target. They state these targets are not effective and instead encourage greater levels of development with only a small amount of affordable housing.</p> <p><i>Comments neither in support nor objection (27):</i> Eight respondents (including the Home Builders Federation) refer to competing requirements in the plan to meet net zero targets and the focus on the development of brownfield land, which may affect the viability of affordable housing delivery. Several of these respondents note the requirement for the affordable housing delivery to be appropriately evidenced, including through viability testing of the policy. One of these respondents and an additional respondent note the potential for increased viability issues for affordable housing provision where homes for older people are delivered. An additional respondent states that greater clarity is needed in relation to any requirement for affordable housing provision within student housing proposals.</p> <p>Four comments state that the draft policy should be supported by clear definitions for social housing, social rent and affordable rent. One of these comments notes that the supporting text highlights that 1,000 affordable homes will be delivered each year by 2024, but that there is no figure included for the period beyond.</p> <p>Three comments highlight that the draft policy does not include any expectations about the split of affordable housing in terms of the size of units. Seven respondents (including the South West Housing Association Planning Consortium) note that the draft policy appears to provide the flexibility to allow affordable homes for sale to be delivered as solely shared ownership units with no requirement for First Homes. A number of these respondents also state that the draft policy wording may need to be reconsidered to ensure that it is compliant with government guidance.</p>	<p>29, 33, 34, 35, 42, 67, 71, 79, 146, 170, 172, 173, 176, 195, 196, 215, 217, 245, 254, 261, 274, 292, 368, 465 (support)</p> <p>362 (object)</p> <p>15, 75, 93, 99, 117, 121, 128, 147, 150, 154, 161, 162, 165, 171, 178, 182, 184, 185, 197, 201, 219, 234, 237, 406, 425, 438, 444 (neither in support nor objection)</p>

<p>One respondent states that the draft policy should include reference to BCC's support for community-led housing schemes.</p> <p>Another respondent notes the current energy crisis and states that, in light of this, it is important for affordable housing to meet its energy needs on-site.</p> <p>One comment states that the delivery of affordable housing should not be achieved at the expense of green space. Another comment states that affordable housing needs to be distributed more evenly throughout Bristol, including within the more affluent areas.</p>	
<p>Comments about the approach to proportion of affordable housing to be sought included in Draft Policy AH1</p> <p><i>Comments in support (8):</i> Five responses note general support for requiring a percentage of affordable homes.</p> <p>Three supporting comments make reference to viability challenges relating to the delivery of affordable housing. Two of these respondents (including the South West Housing Association) support the approach of allowing for the viability of a scheme to be considered as part of determining the percentage of affordable housing to be sought. One respondent supports the principle of including the percentage of affordable homes to be required for housing schemes in the policy and the policy's ambition. However, this respondent is concerned that the requirement for affordable housing may result in impacts on the viability of housing developments.</p> <p><i>Comments neither in support nor objection (14):</i> Four comments state that the draft policy should include a requirement for a relatively high percentage of affordable homes. The Home Builders Federation states that a minimum percentage threshold for Bristol could be set at a level that would likely be achievable for most schemes. The threshold could be varied by area, and a higher target could be set for publicly owned land.</p> <p>Several comments note the absence of a percentage of affordable housing to be required and request that further consultation is undertaken in relation to the final policy. One of these comments questions whether the Viability Assessment undertaken to support the policy will also be consulted upon. Another of these comments states that in addition to wishing to comment further on the policy once further detail is provided, that they would be supportive of the delivery of affordable homes on-site.</p> <p>A further comment highlights the need for additional affordable housing in the Hotwells and Harbourside area and the Cumberland Basin. Two comments make reference to BCC's Affordable Housing Practice Note (2022) and query whether Draft Policy AH1 will replace this Note.</p> <p>Recent permissions for taller buildings are also highlighted and one respondent notes that this could contribute to higher land values and viability of affordable homes in certain parts of the city.</p>	<p>113, 122, 128, 129, 150, 165, 202, 252 (support)</p> <p>41, 49, 65, 93, 127, 147, 154, 167, 171, 177, 196, 219, 275, 386 (neither in support nor objecting)</p>

<p>One comment received states that the draft policy should make it more difficult for developers to avoid the requirement for providing affordable homes on viability grounds and that clarity is needed in relation to how contributions will be used. Another comment states that Viability Assessments should only be submitted when key aspects of the site have been finalised. Furthermore, the move towards increased transparency in Viability Assessments should not include the sharing of commercially sensitive information.</p> <p>One respondent makes reference to shortfalls in affordable housing provision that was not secured through the adopted Local Plan on viability grounds. This respondent queries whether this under-delivery will inform the drafting of the new affordable housing policy.</p>	
<p>Comments about the approach to affordable housing tenure proportion included in Draft Policy AH1 <i>Comments objecting (23):</i> Twelve respondents object to the proportion of affordable units that should be delivered as social rent and affordable home ownership units under draft policy AH1. These respondents object to the reduction in the proposed percentage of social rent units required from 77% in the adopted Local Plan to 75% in draft policy AH1 in the Draft Policies and Development Allocations document (2022).</p> <p>Ten comments state that flexibility should be included in the policy to allow for the split of social rent and affordable home ownership units to be negotiated. This includes the response from the South West Housing Association Planning Consortium, who also objects to the failure to include affordable homes for rent in the tenure split.</p> <p>One respondent objects to requirement of the draft policy for build to rent developments to secure affordable units as affordable private rent except where a stand-alone affordable housing block is delivered which should be provided as 75% social rent and 25% shared ownership. The respondent states that this draft policy approach would be in direct conflict with the NPPF and PPG.</p> <p><i>Comments neither in support nor objection (3):</i> One comment states that the present wording relating to the affordable housing tenure split included in the draft policy is aspirational but should be strengthened. Another respondent states that the draft policy should provide further clarity in relation to build-to-rent schemes and whether onsite affordable private rent will be BCC's preferred solution for these types of developments.</p>	<p>33, 34, 42, 48, 66, 67, 71, 79, 93, 121, 122, 150, 162, 165, 171, 184, 185, 193, 200, 201, 202, 217, 368 (object)</p> <p>12, 88, 465 (neither in support nor objection)</p>
<p>Comments about the general provisions included in draft policy AH1 <i>Comments objecting (3):</i> Two respondents (including the Home Builders Federation) object to the requirement in the draft policy for affordable homes to be disposed of, only to BCC's registered providers. One comment states that the locally affordable price referred to in the policy is not clear, there is no information on how this would be implemented and that reference to it should be removed.</p> <p><i>Comments neither in support nor objection (7):</i> Three comments request clarification is provided regarding the requirements and standards that</p>	<p>88, 121, 147 (object)</p> <p>65, 150, 162, 165, 184, 201, 438 (neither in support nor objection)</p>

<p>developers will be required to engage with registered affordable housing providers on.</p> <p>Three respondents query whether the policy could support opportunities for schemes to be delivered as 100% affordable housing. Two of these respondents (including from the South West Housing Association Planning Consortium) suggest that the policy could include flexibility for the utilisation of public subsidy where schemes are delivered as 100% affordable housing. The comment received from the South West Housing Association Planning Consortium also includes support for seeking appropriate financial contribution towards affordable housing where it is not possible to secure delivery on-site and suggests that engagement between developers and affordable housing providers should include the topics of sustainability and energy requirements.</p> <p>Another respondent suggests that the draft policy requirements are updated to include an additional criterion for freehold community-led housing to be required to remain in the ownership and management of a community-led housing organisation.</p>	
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Overview: In total, one statutory body made comments regarding draft policy AH1: Affordable housing provision. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 8 Summary of consultation responses to elements of the draft policy

Consultee	Reference
<p>General comments about Draft Policy AH1: Affordable housing provision</p> <p>South Gloucestershire Council: Respondent notes that the NPPF does not support an affordable housing requirement on sites smaller than 10 units in urban areas and that the approach of draft policy AH1 adheres to this. Respondent also notes that if the Infrastructure Levy provisions within the Levelling-up and Regeneration Bill 2022 are enacted, levy charges could be collected from below threshold developments to fund Affordable Housing provision and suggests that BCC keeps this under consideration. The respondent also states that it is sensible not to prioritise First Homes over shared ownership, given that this is the preferred tenure in terms of affordability.</p>	Ref 465
<p>Comments about the approach to affordable housing tenure proportion included in Draft Policy AH1</p> <p>South Gloucestershire Council: Respondent notes that more work is to be done on the draft policy following a Viability Assessment and the 2023 Local Housing Needs Assessment refresh. Respondent highlights that the tenure split is complicated by the requirement of NPPF paragraph 65 to provide 10% of all dwellings as affordable home ownership, subject to certain caveats. Whether the 10% is in addition to the proposed 25% of the draft policy or not could depend on the percentage of affordable housing contribution. BCC may want to consider whether it is necessary to specify an exact tenure split within the policy.</p>	Ref 465

5. Draft Policy NZC1: Climate change, sustainable design and construction

Overview: In total, 61 respondents made 78 comments regarding Draft Policy NZC1. Key themes are identified below.

Table 9 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy NZC1: Climate change, sustainable design and construction</p> <p><i>Comments in support (6):</i> The majority of responses note general support for the approach set out. Some of these comments also support the city's net zero ambitions.</p> <p><i>Comments objecting (9):</i> Four comments refer to the support in the draft policy for the achievement of net zero. One of these comment states that the policy should go beyond net zero carbon to be carbon negative to align with UN Sustainable Development Goals. These comments also state that the draft policy should not make the aim of achieving nature positive development subservient to the aim of achieving carbon neutrality. Another comment states that the draft policy should require buildings to be easily adapted to future technologies and to prioritise active travel and achieving PassivHaus principles. The other comment states that an audit of the predicted carbon emissions over the lifetime of the plan is needed to demonstrate that carbon emissions reductions required by the Climate Change Act 2008 will be achieved.</p> <p>Three respondents state that the draft policy is overly onerous and should be considered in the context of potential impacts on the delivery of affordable housing and achieving high quality design. One comment states that the draft policy approach proposed is too drastic a change from the current planning requirements and is likely to prevent development coming forward. An additional respondent states that the draft policy needs to be supported by an accompanying evidence base including viability testing.</p> <p><i>Comments neither in support nor objection (16):</i> Four comments suggest that the draft policy needs to be strengthened by requiring that developments 'must' contribute to mitigating and adapting to climate change.</p> <p>One comment states that the draft policy should also refer to the need to be climate resilient, in addition to adapting to and mitigating climate change. An additional comment states that the policy should refer to global heating instead of climate change given the more serious implications of this terminology. This comment also refers to the requirement in the draft policy for developments to be adapted to changes in the local climate over its lifetime, and requests that the term lifetime is defined.</p> <p>Four comments include reference to additional issues that the draft policy could address to limit carbon emissions and promote adaptation to climate change. These include:</p> <ul style="list-style-type: none"> the location of developments to limit car journeys; and recycling and waste management. 	<p>57, 128, 170, 179, 265, 386 (support)</p> <p>9, 108, 113, 131, 155, 165, 180, 181, 198 (object)</p> <p>65, 127, 130, 136, 143, 148, 161, 173, 177, 190, 218, 219, 244, 458, 459, 464 (neither in support nor objecting)</p>

<p>The Bristol Advisory Committee on Climate Change states that the draft policy could be drafted to achieve better integration with other policies in the plan, including those relating to green infrastructure and energy supply.</p> <p>Two respondents refer to the standards which might be of relevance to the draft policy approach. One of these comments queries whether the draft policy is in line with LETI (Low Energy Transformation Initiative) standards and the other queries whether meeting standards other than BREEAM (as referred to in the draft policy) will be permitted.</p> <p>One comment states that an approach is needed in relation to retrofitting energy efficiency measures to existing building stock.</p> <p>The potential to support the aims of Draft Policy NZC1 through the delivery of high-rise developments is queried by another respondent.</p> <p>An additional respondent states that the requirement to mitigate climate change should not disproportionately negatively impact vulnerable communities.</p>	
<p>Comments about the approach to mitigating and adapting to climate change included in Draft Policy NZC1</p> <p><i>Comments in support (5):</i> Two respondents support the inclusion of the approach to encourage active travel and public transport over the use of private cars. These comments also support requirements in the draft policy for the design of developments to be flexible to changes of use.</p> <p>One comment supports the requirement for the preparation of Sustainability Statements, proportionate to scale of development.</p> <p>An additional comment stating general support for the draft policy approach suggests that the value of the circular economy might be highlighted.</p> <p><i>Comments objecting (1):</i> One comment objects, given that there is potential for the approach to conflict with part 3 of BCC's Urban Living SPD (2018), which sets out guidance for taller buildings.</p> <p><i>Comments neither in support nor objection (4):</i> Two respondents note that the wording of the draft policy needs to ensure that developers are required to take definitive action in relation to addressing climate change. This includes comments from the Bristol Advisory Committee on Climate Change who state that requirements need to go beyond 'business as usual'. One respondent notes that retrofitting energy efficient measures to existing buildings will be an important part of achieving net zero. Another respondent states that the approach could be updated to be better aligned with the sustainable travel hierarchy, by making direct reference to reducing the need to travel.</p>	<p>57, 93, 141, 142, 183 (support)</p> <p>227 (object)</p> <p>110, 129, 177, 234 (neither in support nor objecting)</p>
<p>Comments about the approach to sustainable design standards included in Draft Policy NZC1</p> <p><i>Comments in support (6):</i> Six respondents note support for the sustainable design standards included in Draft Policy NZC1, including the reference to BREEAM and PassivHaus. Several of these respondents suggest that the draft policy might be stronger in terms of its encouragement of these standards.</p>	<p>57, 378, 392, 421, 432, 446 (support)</p> <p>99, 117, 147, 162, 165, 170,</p>

<p><i>Comments objecting (10):</i> Three comments state that the requirement for undertaking BREEAM Communities assessment is overly onerous. Two of these respondents state that BCC should provide evidence and justification if they wish to include additional standards beyond Building Regulations. One of these respondents suggests that to support the necessary supply of homes for social rent, the policy approach should better align with the national timetable for zero carbon homes, as provided for through the Building Regulations which will lead-up to net zero carbon homes from 2030. One of these comments and six additional comments state that the requirement for BREEAM Communities Assessment should be for proposals for significantly more than 100 units.</p> <p>One respondent states that BREEAM Communities assessment is outdated and that applicants should be allowed to demonstrate sustainability performance using their own objective assessment against a common set of sustainability criteria.</p> <p><i>Comments neither in support nor objection (10):</i> Two comments suggest that an equivalent required performance standard for residential development under 100 units could be included in the draft policy.</p> <p>Three comments state that achievement of PassivHaus certification should be a requirement of the draft policy, instead of being encouraged by the policy. This includes the comment from the Bristol Advisory Committee on Climate Change who state that the achievement of PassivHaus at new developments would act to support improved building quality and performance in Bristol.</p> <p>Three responses suggest that the approach to BREEAM standards could be strengthened by specifically requiring the achievement of the 'Excellent' rating or by increasing the level of achievement expected to 'Outstanding'. One respondent states that the draft policy could be clearer in relation to the level of Homes Quality Mark expected to be achieved. One comment received suggests that the application of the draft policy should be subject to a feasibility appraisal through a BREEAM scoping opinion report.</p>	<p>171, 185, 190, 201 (object)</p> <p>12, 49, 80, 88, 100, 116, 177, 219, 269, 425 (neither in support nor objecting)</p>
<p>Comments about the approach to water efficiency included in Draft Policy NZC1</p> <p><i>Comments in support (3):</i> Three comments note general support for the approach to water efficiency included in the draft policy. One of these comments suggest that the draft policy could encourage rainwater/greywater harvesting, and that developments which go beyond the water efficiency standard should be considered favourably.</p> <p><i>Comments objecting (7):</i> Four respondents state that the water efficiency standard included in the draft policy is overly onerous. Two of these respondents state that the water efficiency standard needs to be supported by evidence, such as a Water Cycle Study. One of the respondents states that water efficiency cannot be adequately addressed through draft planning policy given that it will be influenced by the behaviour of building occupants.</p> <p>One comment states that the water efficiency standard should be lowered to promote reduced water use.</p>	<p>69, 141, 261 (support)</p> <p>99, 116, 147, 155, 170, 177, 219 (object)</p> <p>464 (Neither in support nor objection)</p>

<p>Two comments object (including the Bristol Advisory Committee on Climate Change) stating that the draft policy should require rainwater harvesting at developments unless this is demonstrated to be unfeasible.</p> <p><i>Comments neither in support nor objection (1):</i> One respondent notes that the water efficiency standard included is tied to Bristol Water targets for 2050 and questions whether interim targets for 2030 are available.</p>	
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Overview: In total three statutory bodies and partnerships made comments regarding Draft Policy NZC1. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 10 Summary of consultation responses to elements of the draft policy

Consultee	Reference
<p>General comments about Draft Policy NZC1: Climate change, sustainable design and construction</p> <p>Wessex Water: Respondent states that the draft policy could be amended to include requirements relating to drainage. This could include providing information in Sustainability Statements about proposed drainage and proposals only being permitted where there are adequate surface water disposal systems. These types of systems should maximise opportunities for green infrastructure and aim to achieve greenfield run off rates with surface water run-off managed as close as possible to source. Drainage systems should be designed so that the capacity takes account of the likely impacts of climate change and likely changes in impermeable area within the development over its lifetime.</p>	Ref 148
<p>Environment Agency: Respondent states that flood risk mitigation is an essential component of climate adaptation and that Draft Policy NZC1 should be strengthened in this regard.</p>	Ref 218
<p>Comments about the approach to mitigation and adapting to climate change included in draft policy NZC1</p> <p>National Highways: Respondent supports the approach because the promotion of design that is flexible in terms of allowing for change of use/refurbishment will limit the need for extensive building works and limit the demands on the strategic road network. Respondent also supports the embedding of sustainable transport and Sustainability Statements in the policy as a further means of responding to demands on the strategic road network.</p>	Ref 142

6. Draft Policy NZC2: Net zero carbon development – operational carbon

Overview: In total, 63 respondents made 122 comments regarding Draft Policy NZC2. Key themes are identified below.

Table 11 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about policy NZC2: Net zero carbon development – operational carbon</p> <p><i>Comments in support (8):</i> Six comments note general support for the draft policy. One of these comments refers to the Inspector's Report for the Cornwall Climate Emergency DPD (2023) and BCC's Climate Emergency Declaration to demonstrate the soundness of the approach. This respondent also suggests that the draft policy is expanded to detail how low carbon and renewable energy should be maximised in the design of new schemes, to ensure that this type of generation is taken into account in scheme design from the start and within land values. Another of these comments states that the focus on carbon reductions associated with building use needs to be complemented by policy on transport related emissions reduction and support for climate change mitigation research and development.</p> <p>One comment supports the move to an energy use intensity-based policy approach instead of the BREEAM assessment approach.</p> <p><i>Comments objecting (16):</i> Twelve of the comments objecting state that draft policy requirements are overly onerous and will likely have implications for housing delivery, including delivery of affordable homes. One of these comments also states that clarity is needed in relation to whether net zero is expected to be demonstrated at developments by measuring energy use intensity rather than carbon emissions. Five comments state that further viability evidence is needed to justify the policy approach. Two of these comments state that the energy performance standards cannot be set higher than the equivalent of the Code for Sustainable Homes. Another four of these comments state that BCC should consider the policy in light of the Future Homes Standard, the direction of travel of the Building Regulations, and the Government's plan to bring in standardised development management policies.</p> <p>One additional comment specifically questions the approach of requiring reporting on energy use intensity and states that an approach that aligns with the Building Regulations part L, which already includes primary energy targets, would be more suitable.</p> <p>One respondent objects to the level of detail and length of the draft policy and states that it would be better addressed through an SPD. Two further respondents state that the draft policy should do more to address the retrofitting of existing buildings, with additional guidance potentially helpful in relation to addressing this issue where historic assets are present.</p> <p><i>Comments neither in support nor objection (11):</i> Four respondents state that suitable evidence should be made available to support the draft policy. One respondent queries whether the approach of the draft policy aligns with LETI standards. One respondent suggests that the text of the draft policy should refer</p>	<p>87, 108, 113, 128, 179, 208, 261, 265 (support)</p> <p>99, 121, 143, 147, 150, 155, 162, 171, 178, 180, 181, 198, 201, 219, 232, 406 (object)</p> <p>1, 49, 65, 109, 161, 167, 173, 177, 190, 234, 269 (neither in support nor objecting)</p>

<p>to the imminent replacement of part L of the Building Regulations by the Future Homes Standard.</p> <p>One respondent suggests consideration of climate priorities agreed by local people and for those priorities included in plans for their area.</p> <p>One respondent suggests that consideration should be given to focussing energy enhancements on newer buildings over older, more historic buildings.</p> <p>One respondent suggests that the draft policy could be strengthened through the inclusion of the term 'net zero' instead of 'zero carbon' and by explicitly requiring that the criteria of the draft policy are adhered to.</p> <p>The Bristol Advisory Committee on Climate Change states that the policy should recognise the potential impacts of changes to buildings as a result of the policy approach, in terms of the surrounding environment as well as social and economic impacts.</p> <p>One respondent queries what the financial and social implications of a carbon neutral future are likely to be.</p>	
<p>Comments about the approach to energy use in new development included in Draft Policy NZC2</p> <p><i>Comments in support (4):</i> Two comments note general support, with one of these comments noting that the policy requirements will help to ensure that homes are not overly costly for occupiers to operate. Both of these comments state that development should be required to incorporate a minimum area of on-site energy generation.</p> <p>Two further comments support the use of energy use intensity targets. One of these requests clarity about how the targets will be set for buildings not covered by UKGBC standards. This comment also requests that similar targets are required for refurbishments. The other comment suggests that carbon emissions should also be reported upon.</p> <p><i>Comments neither in support nor objection (4):</i> One respondent states that greater flexibility should be included in relation to potential impacts on heritage assets, stating that the criteria relating to energy should be required to be met, only where possible. Another respondent states that the modelling of energy use intensity should be based on a detailed modelling methodology, rather than Building Regulations compliance calculations.</p> <p>The Bristol Advisory Committee on Climate Change states that the draft policy does not incorporate sufficient engagement in relation to flexibility of energy demand and peak load scenarios. Another comment notes that gross floor area and gross internal area are referred to at different points of the supporting text of the draft policy in relation to energy use. It is stated that these terms are not equivalent and that this should be clarified. The same respondent questions whether the use of the Passive House Planning Package is recommended to support the preparation of applications for residential schemes.</p>	<p>93, 116, 170, 223 (support)</p> <p>100, 141, 177, 464 (neither in support nor objecting)</p>
<p>Comments about the approach to specific standards for development included in Draft Policy NZC2</p>	<p>109, 111, 141 (support)</p>

<p><i>Comments in support (3):</i> One respondent supports the inclusion of specific standards for development in policy NZC2. This respondent states that standards outside of BREEAM should be recognised and incorporated. Another respondent notes support for the approach of requiring developments to meet BREEAM or PassivHaus standards. This respondent suggests the draft policy should further encourage the achievement of these standards.</p>	<p>93, 116, 117, 147, 162, 171, 184, 185, 193, 197, 232, 425 (object)</p>
<p>One comment supports the inclusion of asset-level energy use intensity and space heating targets and suggests that supplementary guidance should be prepared to specify absolute targets for energy performance for specific use classes. This comment also supports the inclusion of on-site renewable energy generation targets and suggests that BCC adopts the targets of the UK Net Zero Carbon Buildings Standard once these have been published.</p>	<p>75, 80, 88, 100, 113, 170, 200, 219, 223, 269 (comments neither in support nor objection)</p>
<p><i>Comments objecting (12):</i> Four respondents state that the targets of the policy would bring requirements close to PassivHaus standards which is an overly onerous approach. One of these respondents suggests that viability evidence should be provided to support this approach. Two further comments state that the maximum energy use intensity target is overly onerous. One of these comments states that the on-site renewable energy targets are also overly onerous and requests clarity about whether targets are inclusive of all regulated and unregulated energy sources, and if the target is gross or net of on-site energy generation. Another comment states that reference should be made to the potential conflict of incorporating solar panels as well as providing amenity space and biodiversity gains.</p>	
<p>Another comment also notes the potentially onerous requirements of the standards included and states that certain typologies of building may need bespoke targets. For example, on-site renewable generation is likely to be difficult to achieve at urban sites and therefore offset funding may be appropriate. Three additional comments include general queries about the supporting evidence for the standards set out in the draft policy, including relating to on-site renewable energy provision.</p>	
<p>One respondent objects to setting a maximum energy use intensity stating that it will negatively affect the ability to deliver low density house types. It is also stated that the requirement for on-site renewable electricity generation could result in viability challenges and reduced levels of affordable housing.</p>	
<p>One respondent objects to the requirement in the supporting text for Energy Strategies to report on a building's performance against the latest version of part L of the Building Regulations, stating that this requirement is set too low.</p>	
<p><i>Comments neither in support nor objection (10):</i> One respondent questions whether having more sustainable houses will increase rental prices in Bristol. Another respondent states that the draft policy should not limit renewable electricity generation to on-site provision and allowances could be made for this to be provided at nearby sites.</p>	
<p>One comment queries if there will be a standard method adopted for monitoring energy performance at developments.</p>	

<p>One respondent states that the inclusion of numerical targets is the preferred approach, however another respondent states that targets should be minimum requirements.</p> <p>One respondent states that the policy should require developments to achieve PassivHaus levels of energy efficiency.</p> <p>One respondent requests additional flexibility is incorporated into the standards of the draft policy. It is stated that major non-residential development could be required to meet BREEAM 'Excellent' standards, or could demonstrate a similar level of carbon reduction through an equivalent assessment, and that the standards of the policy should only be required where this is possible.</p> <p>One comment suggests that additional clarity is provided about whether major non-residential buildings would be required to meet the space heating target. Another comment requests that an adjustment is made so that the measurement of energy use intensity is based on gross internal area and excludes renewable energy contributions.</p> <p>One respondent states that the draft policy could be adjusted to require that lighting at new developments is LED with daylight-dimming and absence control preferred.</p>	
<p>Comments about the approach to energy offsetting included in Draft Policy NZC2</p> <p><i>Comments in support (1):</i> One respondent notes support for the principles of the policy and queries if BCC has the necessary expertise to ensure that financial contributions are used for additional energy capacity from low carbon or renewable sources. This respondent also states that projects described as 'carbon offset' should align with the principles outlined by the UK Environmental Reporting Guidelines or International Carbon Reduction and Offset Alliance.</p> <p><i>Comments objecting (4):</i> Three respondents object to the principle of allowing for offsetting where energy requirements cannot be met on-site. One of these respondents states that allowing this type of approach would amount to greenwashing.</p> <p>One respondent states the approach of requiring a financial contribution to be equivalent to the cost of providing additional renewable energy generation elsewhere in the city, gives developers reasons not to apply energy efficiency measures.</p> <p><i>Comments neither in support nor objection (16):</i> One respondent states that further detail is needed on how the process of offsetting will work. Two respondents requested further clarity in the wording and the terminology included in the draft policy. One of these respondents states that additional clarity is needed in relation to the definition of carbon emissions and offsetting. The other respondent requests further clarity on what is deemed to be an approved renewable low-carbon energy scheme or energy efficiency scheme, and what can be considered to be an acceptable directly linked or near-site provision.</p>	<p>141 (support)</p> <p>80, 122, 425, 444 (object)</p> <p>93, 100, 108, 113 116, 130, 155, 165, 177, 197, 200, 219, 228, 234, 269, 465 (comments neither in support nor objection)</p>

<p>The Bristol Advisory Committee on Climate Change states that more explicit guidance is needed in relation to how offsetting criteria will be met, remain transparent and be maintained in the longer term.</p> <p>One respondent suggests that the draft policy should refer explicitly to the use of Section 106 Agreements or equivalent planning obligations for the securing of financial contributions for energy offsetting.</p> <p>One respondent states that offsetting energy use could risk the fabric performance of buildings and an approach of only offsetting residual on-site renewable energy generation could avoid these types of issues.</p> <p>Two comments state that the justification for the financial contribution required by the draft policy should be set out. One of these comments notes that given the urban setting of many sites in Bristol, it is unlikely that on-site energy use measures will be achievable, and therefore a directly connected offsite supply should also be considered appropriate as a solution for meeting residual energy use. Another comment states that the specific standards set out in the draft policy should note that they are subject to viability and that site constraints will be considered. The potential for energy offsetting through the retrofitting of other existing properties should also be recognised.</p> <p>One respondent requests further clarification about the level of financial contribution required for energy use that cannot be met by on-site measures alone. One respondent states that the rates for energy offsetting will need to be reconsidered over time. Another respondent suggests that the approach to energy offsetting should be framed exclusively in relation to energy rather than energy and carbon, to allow the size of the contribution to be directly proportionate to the residual energy demand not generated on-site. One comment recommends allowing housing associations to use investment in decarbonisation of their housing stock as an acceptable means for energy offsetting instead of making financial contributions towards BCC schemes elsewhere in the Bristol area.</p> <p>One comment suggests that where any required reduction in energy use is to be met through energy offsetting, the draft policy should require that offsetting is Council-accredited. This respondent also suggests that a further offsetting option should be included for funding regional carbon capture through local tree planting schemes.</p>	
<p>Comments about the approach to development involving existing buildings included in Draft Policy NZC2</p> <p><i>Comments neither in support nor objecting (3):</i> One respondent states that the policy needs to provide clarity about how existing buildings that form part of a wider development should be treated.</p> <p>One respondent states that the draft policy should explicitly identify heritage assets as an example of an on-site constraint that would make the targets relating to energy use unfeasible to be met.</p>	<p>100, 219, 234 (comments neither in support nor objecting)</p>

Another respondent queries if development involving existing buildings that demonstrates a reduction in energy demand as far as is practical, would then be subject to energy offsetting requirements.	
<p>Comments about the approach to PassivHaus buildings included in Draft Policy NZC2</p> <p><i>Comments neither in support nor objection (4):</i> One respondent suggests that the minimum standard required by the draft policy might be PassivHaus Plus or Premium to ensure sufficient on-site energy generation.</p> <p>One respondent states that development complying with PassivHaus standards can often present difficulties in terms of gaining planning permission when considering their aesthetic quality. This respondent also suggests that non-PassivHaus developments should have performance testing post-completion mandated by planning condition and that all new development should be tested for airtightness.</p> <p>One respondent requests clarity about the assessment process to establish whether a building meets PassivHaus standards. Related to this, a further comment states that the technical information required from a developer to demonstrate that PassivHaus standards can be achieved, should be clarified.</p>	269, 375, 444, 464 (comments neither in support nor objecting)
<p>Comments about the approach to system flexibility included in Draft Policy NZC2</p> <p><i>Comments neither in support nor objection (2):</i> Two respondents note support for the inclusion in the draft policy of reference to flexible and smart technologies. One of these respondents also states that in addition to the reference to battery storage already included in the draft policy, it should also refer to thermal storage. This approach will help achieve benefits relating to reduced embodied carbon and cost, achieved through a combined approach of providing thermal storage alongside electric heating.</p> <p>The other respondent states that further guidance will be needed to aid with the interpretation of this part of the draft policy.</p>	108, 141 (comments neither in support nor objection)
<p>Comments about the approach to heating and cooling systems included in Draft Policy NZC2</p> <p><i>Comments in support (2):</i> One respondent notes general support for the approach of eliminating the use of cooling systems at developments. One respondent supports the approach of meeting residual cooling requirements through mechanical ventilation and active cooling given that there is potential for air quality or noise mitigation to result in limited natural ventilation and this can mean otherwise acceptable schemes may not be permissible.</p> <p><i>Comments objecting (4):</i> Three respondents object to the draft policy approach to heat networks. One respondent states that heat networks are more carbon intensive than heat pumps. Another respondent states that the approach of connecting to existing or new classified heat works should be moved down the hierarchy, in the interests of decarbonisation. The other respondent states that the national grid is already in place to meet residents' energy needs which is already being decarbonized and that creating new heat networks would not be energy efficient.</p>	57, 117 (support) 113, 171, 219, 425 (object) 12, 49, 80, 89 , 116, 130, 177, 200, 228 , 269, 465 (comments neither in support nor objection)

<p>One comment suggests that the draft policy should clarify that new gas boilers should not be installed at developments and that these must be replaced by sustainable solutions, such as renewables or electric heat pumps. The draft policy could also include a preference for mixed-mode ventilation and define that all pumps and fans are to be provided at variable speeds.</p> <p><i>Comments neither in support nor objection (11):</i> Two respondents state that draft policies on noise should cross-refer to the draft policy approach on cooling given that noise at a location may affect the appropriateness of passive cooling. These respondents also state that the classified heat networks definition should include the presumption that new networks are scaled to serve existing development.</p> <p>One respondent queries whether calorifiers or heat pumps will be required at the termination of the heat network within a development and whether heat pumps will be required to have a minimum coefficient of performance. This respondent also states that metrics and guidance that are in place in relation to assess climate risk, at the time of drafting, should be detailed further within the draft policy. Another comment states that the approach could be clarified by stating the metrics that should be used to identify the most sustainable heating and cooling system.</p> <p>One comment suggests wording around heat networks should state that they are to be 'zero or low-carbon heat networks' to prevent developments connecting to heat networks that would result in more energy consumption and carbon emissions than an individual heat pump system. One comment states that the draft policy should be amended to allow for alternative compliance to classified heat networks.</p> <p>The response from the Bristol Advisory Committee on Climate Change states that the draft policy should recognise that the UK is already locked into more extreme temperature projections and that development should eliminate future requirement for energy-intensive cooling systems.</p> <p>Another respondent suggests reference should be made to tree planting as part of the approach to minimising the amount of heat entering buildings.</p>	
<p>Comments about the approach to delivering modelled performance included in Draft Policy NZC2</p> <p><i>Comments in support (2):</i> One respondent highlights the quality regimes referenced in the draft policy and states that these are greatly needed. Another respondent supports the draft policy but queries how requirements will be met.</p> <p><i>Comments objecting (1):</i> One respondent states the approach does not reference the Building Regulations part L reporting which is obligated. The draft policy potentially adds duplication, costs and complexity and therefore should be removed or justified in relation to any value added.</p> <p><i>Comments neither in support nor objection (4):</i> One respondent queries whether developers will be required to meet the approach set out in the draft policy or if it is only an expectation. Two respondents (including the response from the Bristol Advisory Committee on Climate Change) state that there needs to be a</p>	<p>116, 425 (support)</p> <p>117 (object)</p> <p>93, 170, 177, 269 (comments neither in support nor objection)</p>

greater emphasis placed on post-occupancy monitoring. One of these respondents states that there should be a penalty for developments that do not comply.	
One comment states that the undertaking of thermal assessments should be promoted by the draft policy to ensure that buildings have been constructed in accordance with their designed performance.	

Overview: In total five statutory bodies and partnerships made comments regarding Draft Policy NZC2. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 12 Summary of consultation responses to elements of the draft policy

Consultee	Reference
General comments about Draft Policy NZC2: Net zero carbon development – operational carbon	
Natural England: Respondent supports the requirement to assess energy use for development sites, minimise energy demand and maximise on-site renewable energy generation. Respondent encourages considering how BCC can better facilitate district heating schemes that use and distribute renewable energy.	Ref 208
Comments about the approach to energy offsetting included in Draft Policy NZC2	
Bath and North East Somerset Council: Respondent states that clarity is needed in relation to the potential need to accommodate offsetting measures where they would impact on or be met on land within Bath and North East Somerset. The comment is made in context of development sites that may come forward close to the authorities' boundary.	Ref 228
South Gloucestershire Council: Respondent states that clarity is needed in relation to the potential need to accommodate offsetting measures where they would impact on or be met on land within South Gloucestershire. The comment is made in the context of development sites that may come forward close to the authorities' boundaries.	Ref 465
Comments about the approach to heating and cooling systems included in Draft Policy NZC2	
Sport England: Respondent states that the draft policy should make it clear that existing sport and recreation land and buildings including playing pitches should not be affected by proposals for heat networks.	Ref 89
Bath and North East Somerset Council: Respondent states the draft policy could have implications for and present opportunities for joint working with Bath and North East Somerset on large scale developments close to the administrative boundary. Joint working between the two authorities is suggested to consider the potential for and how heat networks could best be delivered.	Ref 463
South Gloucestershire Council: Respondent states the draft policy could have implications for and present opportunities for joint working with South Gloucestershire on large scale developments close to the administrative boundary. Joint working between the two authorities is suggested to consider the potential for and how heat networks could best be delivered.	Ref 465

7. Draft Policy NZC3: Embodied carbon, materials and waste

Overview: In total, 53 respondents made 78 comments regarding Draft Policy NZC3. Key themes are identified below.

Table 13 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy NZC3: Embodied carbon, materials and waste</p> <p><i>Comments in support (4):</i> Four respondents generally support Draft Policy NZC3. One of these respondents suggests that embodied carbon targets might also be included in relation to the renovation of existing housing stock.</p> <p><i>Comments objecting (8):</i> Three respondents state that the draft policy is overly onerous and should be considered in the context of potential impacts on the delivery of affordable housing and achieving high quality design. One respondent states that the stepped approach to achieving net-zero set out in Building Regulations is more pragmatic as it gives developers more time to amend designs and to adopt energy efficient technologies as they become more affordable. The uplift to building costs resulting from delivering net zero embodied carbon should be included in the Viability Assessment for the plan.</p> <p>Another respondent states that the draft policy is overly long and contains too much detail and therefore the approach should be subject to an SPD.</p> <p>One respondent suggests that the scope of the draft policy should be widened to include reference to embodied emissions influencing climate change and not only carbon. The draft policy also needs to be strengthened to require the use of existing structures in support of reducing embodied carbon emissions and energy.</p> <p>One comment states that including one embodied carbon target for all types of non-residential schemes will have a negative impact on types of development that were not considered as part of the preparation of the related RIBA embodied carbon targets. Another comment states that as there is no accessible tool for the calculation of embodied carbon, it is too early to include a draft policy of this type.</p> <p><i>Comments neither in support nor in objection (10):</i> Three respondents state that a draft policy should be included to require the reuse / repurposing of existing buildings, with the option of demolition being taken forward only if there is no alternative and where materials would be reused.</p> <p>Another respondent states that the draft policy should require the protection of soils. One comment queries whether the approach aligns with LETI standards.</p> <p>Two comments include reference to the assessment requirements. One of these comments requests more detail in relation an approved methodology for the assessment requirements. The other questions how the decisions of planners will consider the embodied carbon savings that might result from retrofitting older buildings alongside the potential more limited performance of these</p>	<p>128, 170, 179, 261 (support)</p> <p>155, 178, 180, 181, 193, 198, 219, 232 (object)</p> <p>65, 88, 173, 200, 270, 392, 406, 421, 432, 458 (neither in support nor objection)</p>

<p>buildings compared to new developments, in terms of energy efficiency and other issues.</p> <p>One respondent requests that the evidence base used to arrive at the targets should be provided. Another respondent also refers to the Viability Assessment of the plan and the implications of the draft policy in relation to viability of housing schemes including housing for older people.</p> <p>One comment requests that the requirements of the draft policy are based on benchmarks so that the policy can be flexible and respond to changing circumstances.</p>	
<p>Comments about the approach to embodied carbon – general principles included in Draft Policy NZC3</p> <p><i>Comments in support (4):</i> Four comments note support for the general principles related to embodied carbon. Three of these comments support the prioritisation of renovation and retrofitting of buildings. The other suggests the promotion of sustainable and responsibly sourced timber as a means of reducing embodied carbon.</p> <p><i>Comments neither in support nor in objection (5):</i> Four respondents note the approach in relation to prioritising renovation or retrofitting of existing structures. This includes the response received from the Bristol Advisory Committee on Climate Change who suggest that greater emphasis should be placed on the approach of prioritising this type to development. The other three comments query how developers will be required to demonstrate that they are prioritising this type of development. One of these comments suggests that BCC might provide an approved methodology for demonstrating compliance with the prioritisation of renovation or retrofitting existing structures.</p> <p>One additional comment states that tree planting should be included as a means of mitigating overheating.</p>	<p>127, 226, 252, 265 (support)</p> <p>113, 116, 131, 177, 219 (neither in support nor in objection)</p>
<p>Comments about the approach to embodied carbon – major applications included in draft policy NZC3</p> <p><i>Comments in support (2):</i> One respondent supports the approach of using the high scenario in valuing carbon dioxide equivalent in relation to offsetting shortfalls in embodied carbon targets through financial contributions. Another respondent supports the approach of including embodied carbon limits in the draft policy on the basis that, alongside energy use intensities targets, this ensures both carbon and energy use are managed complementarily and not traded against each other. This respondent also suggests more detailed updates that the policy might be subject to and suggests additional clarity is provided in relation to when the embodied carbon limits would be allowed to be exceeded. It is suggested that exceedance should only be in exceptional circumstances.</p> <p><i>Comments objecting (9):</i> Six comments (including the comment from the Bristol Advisory Committee on Climate Change) reference the different approach for buildings of varying heights. Some of these comments state that the draft policy should not include lesser requirements for taller buildings and that if taller buildings perform less favourably in relation to embodied carbon, the strategy of the plan should reflect this. Two of these comments state that developers should be incentivised to go further than the embodied targets included in the</p>	<p>113, 141 (support)</p> <p>49, 80, 93, 108, 121, 131, 171, 177, 219 (object)</p> <p>116, 117, 150, 165, 184, 185, 190, 197, 200, 234, 378, 392, 421, 432, 466 (neither in support nor in objection)</p>

<p>draft policy. One of these comments states that an additional target for embodied carbon in bungalows or two storey houses should be set to avoid over delivery of taller buildings which are likely to be less suited to accommodating a range of user types. Furthermore, the embodied carbon targets should be reviewed over time. One of these comments also states that the draft policy should not allow for an option where embodied carbon targets cannot feasibly be met through an embodied carbon assessment.</p> <p>One respondent states that the approach to carbon offsetting shortfalls against embodied carbon targets, should be specified to ensure that developers contribute to impactful actions such as local, accredited tree planting.</p> <p>One comment notes the likely increases to development costs and delivery impacts as a result of setting out targets for embodied carbon, stating that as there is no viability testing provided for the draft policy, the targets and approach to offsetting is not justified.</p> <p>One respondent notes that the RIBA standards in the embodied carbon targets will soon be outdated. The respondent states that the draft policy is therefore not ambitious enough, particularly given the recognised increasing importance of embodied carbon in a building's life cycle as there is a trend towards lower carbon emissions associated with building operation.</p> <p><i>Comments neither in support nor in objection (15):</i> Eight comments state that further evidence should be provided to justify the targets and standards included in the draft policy. This includes a need to demonstrate that the targets and standards are viable. One of these comments states that carbon targets should be defined for different building types and that clarity is needed in relation to the approach to requiring offsetting, either as a one-off payment or over a specified period of time. Another of these comments notes that a majority of building costs will not be confirmed at application stage and therefore any assessment would likely have to be based on benchmarking.</p> <p>Four respondents note that targets included in draft policy relating to life-cycle carbon emissions could be indexed to benchmarks so that they are subject to regular review, whilst another comment suggests targets should be reviewed every 5 years.</p> <p>One respondent states that the draft policy should note that any financial contributions required as part of offsetting are subject to viability assessment. Furthermore, the potential for energy offsetting through the retrofitting of other existing properties should also be recognised in the draft policy.</p> <p>One respondent states that clarity is needed in relation to whether major applications for the change of use of an existing building would be required to submit an embodied carbon assessment.</p>	
<p>Approach to refrigerants included in Draft Policy NZC3</p> <p><i>Comments objecting (2):</i> One respondent objects stating that the draft policy should require that refrigerants have a low Ozone Depletion Potential and that refrigeration systems should be insulated with compressor controls and leak detection. One respondent states that there is insufficient flexibility in</p>	<p>113, 121 (object)</p> <p>80, 116, 177, 219, 464</p>

<p>requirement for developments with fixed building services that include a refrigerant to have the lowest global warming potential.</p> <p><i>Comments neither in support nor in objection (5):</i> One respondent states that the topic of refrigerants would be best addressed under the category of ongoing carbon usage, not embodied carbon. A further comment suggests that greater clarity is needed in relation to the link between refrigerants and embodied carbon.</p> <p>Another comment states that the term that global heating should be used in the draft policy and supporting text instead of global warming and climate change.</p> <p>One comment suggests that the benefit of this draft policy is questionable in terms of addressing the global warming potential of refrigerants. This respondent highlights the UK wide 'F-Gas Regulations' that place limits on acceptable global warming potential impacts of these types of materials.</p> <p>A comment from the Bristol Advisory Committee on Climate Change states that clarity is needed in the draft policy in relation to how the topic of refrigerants should be addressed as part of an embodied carbon assessment.</p>	<p>(neither in support nor in objection)</p>
<p>Approach to materials included in Draft Policy NZC3</p> <p><i>Comments in support (2):</i> Two respondent support the approach of avoiding the use of tropical hardwoods included in the draft policy. One of these respondents suggests that this material might be acceptable in developments if it is reclaimed or recycled and where it is used full justification should be provided.</p> <p><i>Comments objecting (3):</i> Two respondents state that requirements relating to materials are too imprecise for development management purposes and should be reworded. Another respondent states that the draft policy is too vague in terms of how it will support the decarbonisation of building materials.</p> <p><i>Comments neither in support nor objection (3):</i> One respondent suggests that the draft policy could be strengthened by limiting the use of harmful materials and requiring that developments are supported by a 'building passport', listing the materials used in the build so that they can be retained and reused upon demolition. Two respondents state that the draft policy should require developments eliminate the use of tropical hardwoods and not the minimisation of these materials. These respondents also suggest that the draft policy should support developments that minimise the use of petrol-chemical based and environmentally toxic materials.</p>	<p>170, 464 (support)</p> <p>162, 165, 444 (object)</p> <p>113, 209, 438 (neither in support nor in objection)</p>
<p>Approach to demolitions, waste and recycling included in Draft Policy NZC3</p> <p><i>Comments in support (1):</i> One respondent supports the approach of designing out of waste. This respondent also suggests more explicit consideration of the principles of the circular economy could be included and development that that extends a building's life cycle be promoted, by allowing for adaptability and easy maintenance/replacement of building elements.</p> <p><i>Comments objecting (4):</i> Four comments object to the approach to demolition, waste and recycling. These comments state that the draft policy it is not sufficiently precise to be used for development management purposes.</p>	<p>141 (support)</p> <p>162, 165, 171, 201 (object)</p> <p>234 (neither in support nor in objection)</p>

<p><i>Comments neither in support nor objection (1):</i> One comment states that the draft policy could provide a clear definition of what is meant by reuse, recycling and recovery. This comment states that separate targets for reuse and recycling (rather than a single composite target) could be included to drive materials up the waste hierarchy.</p>	
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8. Draft Policy NZC4: Adaptation to a changing climate

Overview: In total, 44 respondents made 57 comments regarding Draft Policy NZC4. Key themes are identified below.

Table 14 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy NZC4: Adaptation to a changing climate</p> <p><i>Comments in support (6):</i> Five respondents note general support for draft policy NZC4. One comment supports the approach to utilising the benefits of green infrastructure to help make development resilient to climate change impacts.</p> <p><i>Comment objecting (3):</i> Three respondents state that the draft policy is onerous and should be considered in the context of potential impacts on the delivery of affordable housing and achieving high quality design.</p> <p><i>Comments neither in support nor in objection (15):</i> Four respondents state that the requirements should be caveated in relation to specific constraints that may be present on a given site, as well as potential viability considerations.</p> <p>Three respondents suggest changes to demonstrate the immediacy of climate change, to strengthen the draft policy text and to require climate resilient measures to be designed into developments from their inception rather than achieving this through retrofitting. Similarly, another respondent suggests that the draft policy should make it clear that the criteria included are requirements or guidelines which developers should aim to meet.</p> <p>Two respondents suggest that the draft policy should be updated to clarify what are development specific risks to inhabitants and vulnerabilities to climate change. One respondent notes the potential overlap of the requirements of the policy with the Building Regulations Part O.</p> <p>One respondent notes that enforcement of this draft policy is likely to require specialist skills within the BCC team.</p> <p>One respondent suggests the approach needs to include support for people travelling by a variety of transport modes in all conditions, with an emphasis on vulnerable users. Another respondent suggests that a more strategic view of the impact of development for Bristol is needed. This should include defined targets in relation to issues such as water and drainage considering the effects of climate change.</p>	<p>93, 128, 129, 179, 261, 265 (support)</p> <p>180, 181, 198 (object)</p> <p>80, 121, 130, 131, 136, 150, 162, 165, 171, 173, 183, 201, 208, 219, 464 (neither in support nor objection)</p>

<p>Comments about the approach to site-level adaptations included in Draft Policy NZC4</p> <p><i>Comments in support (2):</i> Two comments note overall support for the draft policy approach. These comments refer positively to the role identified for green infrastructure in adapting to the effects of climate change and the requirement for developments to include comfortable external spaces. These respondents also note an expectation that this draft policy approach will be applied to emerging draft site allocations and towards greening on BCC land.</p> <p><i>Comments neither in support nor in objection (19):</i> A number of respondents suggest that the draft policy could include additional criteria to minimise climate change risks. This includes seven respondents who suggest that the draft policy should refer to additional adaptation measures to reduce the risk and impact of flooding including referring to national standards for sustainable urban drainage. One of these respondents also states that the policy criteria should be extended to include reference to extreme weather events.</p> <p>Additional criteria suggested by several other respondents, include:</p> <ul style="list-style-type: none"> • reuse of water on-site; • avoiding the use of heat-absorbing surfaces at new developments and solar gain more generally; • addressing the potential for vector-borne diseases from climate change; and • use of tree cover for shade. <p>The Bristol Advisory Committee on Climate Change refers to similar potential amendments to the draft policy, stating that there is a need to reliable transportation, as well as the resilience of existing buildings. Developers should be required to take a strategic view of climate change adaptation considering the needs of the surrounding communities.</p> <p>Two respondents suggest that the draft policy could be linked to the Building with Nature standards and Draft Policy BG1, and that nature based solutions to climate change adaptations should be encouraged as the default solution. One respondent states that the policy should make specific reference to wildlife ponds and trees. Similarly, another respondent states that reference to the creation of new public parks and green spaces should be included as examples of green infrastructure. Three respondents state that in addition to the more general references to green infrastructure, gardens should also be referenced given benefits for carbon capture and mitigation of urban heat generation. Furthermore, the emphasis should be on retaining existing vegetation, given any replacement would not have similar benefits until it can mature.</p>	<p>57, 208, (support)</p> <p>9, 49, 80, 111, 113, 126, 130, 136, 141, 154, 155, 177, 218, 378, 392, 413, 421, 432, 458 (neither in support nor objection)</p>
<p>Comments about the approach to building-level adaptations included in Draft Policy NZC4</p> <p><i>Comments neither in support nor in objection (7):</i> Two respondents note that the draft policy could be amended to include reference to a requirement to address adaptation to flood risk at a building level. Another respondent suggests that the criteria for building-level adaptations might include reference to avoiding single aspect layouts, which can increase vulnerability to overheating.</p> <p>In relation to avoiding climate impacts that lead to increases in energy use, one comment suggests that the preferred approach should be the use of green</p>	<p>108, 113, 116, 130, 170, 218, 464 (neither in support nor objection)</p>

<p>infrastructure and that a cross reference should be included to draft policy NZC1.</p> <p>Two respondents make comments in relation to mechanical ventilation. One notes that as PassivHaus requirements on overheating are stringent, it is unlikely that certification in line with these standards could be achieved through natural ventilation alone. The other suggests that where mechanical cooling is required, the potential to combine heating and cooling requirements should be explored.</p> <p>One comment received requests clarity in relation to how the criteria relating to building-level adaptations might be achieved.</p>	
<p>Comments about the approach to adaptation strategies included in Draft Policy NZC4</p> <p><i>Comments in support (1):</i> One respondent notes support for a specific adaptation strategy, that will involve the assessment of proposals against the most recent climate projections. This respondent suggests that the draft policy could require the assessments of risks to consider impact on the wider community.</p> <p><i>Comments objecting (1):</i> One respondent states that the requirements of the draft policy should be proportionate to the nature and scale of development given that this could increase the cost of planning applications and impact housing delivery.</p> <p><i>Comments neither in support nor in objection (3):</i> One comment suggests that the requirement in the policy for proposals to be supported by an adaptation strategy should explicitly require that climate resilience is addressed through the strategy.</p> <p>Another comment states that the use of the TM59 analysis methodology to assess a development against current and future weather files should be made a requirement.</p> <p>One respondent requested that a draft adaptation strategy is worked up by BCC so that applicants know what will be considered acceptable.</p>	<p>141 (support) 121 (object) 130, 150, 464 (neither in support nor objection)</p>

Overview: In total two statutory bodies and partnerships made comments regarding Draft Policy NZC4. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 15 Comments from statutory bodies and partnerships

Consultee	Reference
General comments about Draft Policy NZC4: Adaptation to a changing climate	
<p>Natural England: Respondent notes support for the approach of requiring new development to assess the risk from climate change to inhabitants and the environment, and to identify both site and building level measures to mitigate these impacts. However, the respondent states that further clarity of wording is needed in relation to whether developments must meet the requirements of the draft policy, or if they should simply aim to meet them.</p>	Ref 208
Comments about the approach to site-level adaptation included in Draft Policy NZC4	

Natural England: Respondent supports the role identified for green infrastructure in adapting to the effects of climate change, and expects this to translate into requirements for specific allocations and development areas.	Ref 208
Environment Agency: Respondent states that the draft policy should be amended to include reference to flood risk adaptation and the impact of flooding. It should also refer to a detailed flood risk policy. The draft policy should require developments to ensure the safety of current and future occupiers during flood events.	Ref 218

9. Draft Policy NZC5: Renewable energy development

Overview: In total, 20 respondents made 20 comments regarding Draft Policy NZC5. Key themes are identified below.

Table 16 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy NZC5: Renewable energy development</p> <p><i>Comments in support (7):</i> Six comments support the general approach to renewable energy development set out in the draft policy. Three of these comments support the approach of focussing renewable energy capacity in the Avonmouth Industrial and Bristol Port area. Another comment states that public subsidy support should be made available for new heat networks. One of the respondents in support of the draft policy states that a further policy might be developed to specifically support development at the port and help deliver net-zero and sustainability goals.</p> <p><i>Comment objecting (3):</i> Three respondents state that the draft policy is overly onerous and should be considered in the context of potential impacts on the delivery of affordable housing and achieving high quality design.</p> <p><i>Comments neither in support nor objection (10):</i> Three comments highlight the need to consider the impact of new development for energy generation in relation to residential areas, landscape, biodiversity net gain and historic assets, as well as the contribution they make to decarbonisation and benefits for local communities.</p> <p>One comment refers the need for existing development for renewable energy generation in Bristol to be protected as new growth occurs in the city.</p> <p>One respondent states the draft policy needs to provide stronger support for renewable energy development, with additional draft policy support suggested in relation to solar panels and offshore wind.</p> <p>One comment states that renewable energy should be planned for through a strategic approach to development, to avoid piecemeal proposals and an overconcentration in an area. One comment highlighted that development for renewable energy needs to be considered in light of increasing electricity demands.</p>	<p>93, 128, 179, 208, 261, 362, 463 (support) 180, 181, 198 (object)</p> <p>49, 80, 108, 110, 129, 170, 218, 228, 269, 465 (neither in support nor objection)</p>

Overview: In total, five statutory bodies and partnerships made comments regarding Draft Policy NZC5. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 17 Comments from statutory bodies and partnerships

Consultee	Reference
<p>General comments about Draft Policy NZC5: Renewable energy development</p> <p>Natural England: Respondent supports the approach of recognising the potential impact of development of renewables on biodiversity. BCC should explore the most suitable and deliverable options for renewables in different parts of the plan area, having regard to the ecology, including potential impacts on the Severn Estuary SPA/Ramsar. Commercial development could be encouraged to use solar panels for energy generation, or green roofs to reduce demand for air conditioning.</p>	
	Ref 208

Consultee	Reference
Environment Agency: Respondent states that plans for renewable and low carbon heat from sources such the Floating Harbour should be coordinated through a Development Framework to avoid a piecemeal approach to development on a site-by-site basis.	Ref 218
Bath and North East Somerset Council: Respondent notes the plan's approach is for renewable energy capacity to be focussed within the Avonmouth and Bristol Port areas. From this perspective, the approach to renewable energy development does not appear to have direct implications for Bath and North East Somerset. However, continued dialogue on this matter would be appreciated should the approach change, considering the sub-regional importance of renewable energy provision and associated climate emergency declaration.	Ref 228
North Somerset Council: Respondent supports Bristol's intention to facilitate renewable energy development within its area through the plan. Respondent notes the approach of Avonmouth being identified as the location with the greatest potential for on-shore wind power and the Avonmouth Industrial and Bristol Port area remaining suitable for wind and other renewable and low-carbon energy development.	Ref 463
South Gloucestershire Council: Respondent notes the plan's approach is to focus renewable energy capacity within the Avonmouth and Bristol Port area. From this perspective the approach to renewable energy development could have direct implications for South Gloucestershire. Continued dialogue on this matter would be appreciated particularly given the sub-regional importance of renewable energy provision within the context of the climate emergency declaration.	Ref 465

10. Draft Policy BG1: Green infrastructure and biodiversity in new development

Overview: In total, 64 respondents made 86 comments regarding draft policy BG1. Key themes are identified below.

Table 18 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy BG1: Green Infrastructure and biodiversity in new development</p> <p><i>Comments in support (18):</i> Several responses note general support for approach to the protection of biodiversity and for the focus of the draft policy on:</p> <ul style="list-style-type: none"> the preservation of green spaces; green and blue infrastructure; nature recovery; and building on brownfield land. <p>One respondent expressed their support for the draft policy noting that they are supportive of promoting sustainable landscaping design and rewilding existing green spaces, where appropriate. One respondent suggests that this policy should have primacy in the plan, and another highlights the need to develop a Local Nature Recovery Strategy for the West of England.</p> <p>Another respondent states that there should also be a commitment in the draft policy to work with local groups, rather than corporate partners, on the delivery of projects. One respondent supports the draft policy but notes that recent developments or plans around Hotwells and Harbourside have not adopted these measures.</p> <p>One respondent suggests that the policy should refer to the West of England Local Cycling and Walking Infrastructure Plan so that new active travel links delivered as part of green infrastructure improvements can contribute positively to the existing cycle network.</p> <p>Two respondents recommend the use of Urban Greening Factors to demonstrate the achievement of greening at new development. This could include key area-based targets such as tree canopy cover.</p> <p><i>Comments objecting (8):</i> Three respondents object to the assumption in the supporting text that brownfield sites have less biodiversity value than greenfield sites. It is suggested by some of these respondents that it may be more appropriate to use these types of sites for the creation of green or open spaces, rather than develop them. Another states that the draft policy will do little to increase the level of protection afforded to green infrastructure in Bristol.</p> <p>One respondent states that the draft policy wording lacks precision about what exact requirements should be met by development. Three respondents state that the draft policy is overly onerous and it should be considered in the context of potential impacts on housing delivery.</p> <p><i>Comments neither in support nor objection (16):</i> The Bristol Parks Forum states that there should be a requirement to monitor the success of the draft policy and</p>	<p>15, 66, 93, 109, 126, 128, 129, 141, 179, 183, 245, 252, 261, 265, 270, 272, 286, 291 (support)</p> <p>80, 175, 177, 180, 181, 198, 219, 428 (object)</p> <p>9, 12, 41, 49, 57, 113, 127, 130, 131, 136, 155, 192, 208, 234, 378, 465 (neither in support nor objecting)</p>

<p>to apply adaptive management and replacement mitigation. This respondent also requests that the draft policy notes the benefits of nature recovery and biodiversity, and that it should clarify the role of the West of England Joint Green Infrastructure Strategy 2020-2030 and Nature Network in relation to the Bristol Local Plan. Another respondent also requested this clarification.</p> <p>Seven respondents suggest changes to strengthen the draft policy. These include:</p> <ul style="list-style-type: none"> • Cross-referencing with other benefits of green infrastructure such as nature-based flood management, sustainable drainage, tree planting, food growing, health and wellbeing, mitigating the urban heat island effect, air quality and active travel. • Referring to the ecological emergency declaration and climate change. • Stating that green infrastructure provision should be incorporated into all new development. • Replacing 'expected' and other types of conditional language with 'must'. • Including specific reference to the protection and enhancement of hedgerows and urban hedges. • Ensuring that functional land surrounding designated biodiversity sites is protected to preserve the integrity of wider ecological networks. <p>One respondent states that reference to biodiversity should be removed from the draft title policy given this suggests a bias towards the protection of wildlife. This respondent suggests the inclusion of a more balanced and connected approach to mitigation, which also considers climate change.</p> <p>Another respondent queries whether an analysis of the amount of green space needed in Bristol has been undertaken. One respondent states that the targets set out in this policy will not be met if BCC requires neighbouring authorities to build on their green spaces to meet its development needs.</p> <p>Clarity is requested by another respondent in relation to the term "green decks" which is included in the policy. This respondent also suggests including support in the policy for permeable paving for parking and mosaic habitats.</p> <p>One respondent requests flexibility is built in the policy, to support developments that involve older buildings and heritage assets.</p>	
<p>Comments in relation to the approach to the provision of green infrastructure in new developments in Draft Policy BG1</p> <p><i>Comments in support (5):</i> One respondent supports references to nature-based solutions and connections to Nature Recovery Networks. This respondent suggests further signposting to the expectation to use tools to quantify the multifunctionality of green infrastructure.</p> <p>Another respondent suggests that as well as the requirement for developer contributions towards new green infrastructure, the draft policy should also require developer contributions towards the maintenance and improvement of existing parks and green spaces.</p> <p>One respondent requests that the draft policy makes reference to the inclusion of different types of green infrastructure, including edible plants and other food growing spaces, beyond allotments.</p>	<p>141, 183, 210, 213, 218 (support)</p> <p>121 (object)</p> <p>9, 49, 80, 111, 130, 136, 143, 147, 162, 165, 170, 171, 177, 184, 185, 193, 201, 208, 223, 378, 392, 421, 432, 458 (neither in</p>

<p>Another respondent notes that many newer developments do not have open spaces for residents to enjoy, highlighting the importance of the draft policy.</p> <p><i>Comments objecting (1):</i> One respondent objects to this aspect of the draft policy as being too onerous and inflexible, stating that the requirements relating to the provision of green infrastructure at new developments may be impractical or unviable. This respondent states that the draft policy does not present evidence to justify these requirements, nor is it consistent with national policy.</p> <p><i>Comments neither in support nor objection (24):</i> The Bristol Parks Forum states that the draft policy should be more ambitious, and that the creation of new public parks or green spaces should be included.</p> <p>Eleven respondents suggest further measures to help strengthen the draft policy. These include:</p> <ul style="list-style-type: none"> • Updating the draft policy text so that developments are required to make all efforts to create and enhance opportunities to connect to, or enhance, the integrity of the Nature Recovery Network and wider ecological networks. • Including measures to support increased rainfall retention and to reduce the risk of local flooding when modifications are made to existing properties. • Requiring development to be planned to allow for wildlife connections. • Expanding the benefits that could be provided through green infrastructure in the draft policy and supporting text, to include active travel. • Cross-referencing the draft policy to the government's decision to make the provision of sustainable drainage systems mandatory for all new developments. • Replacing 'expected' and conditional language with 'must'. • Requiring support for the long-term maintenance of green infrastructure over a development's lifetime. • Promoting the assessment of canopy cover as part of the approach to mitigating the urban heat island effect. <p>One respondent states that developers should look beyond their site boundaries to ensure the connection, protection and enhancement of green infrastructure. This respondent also states that the draft policy should refer to the Natural England GI Framework.</p> <p>Another respondent queries whether the risk of vector-borne diseases resulting from climate change has been considered in relation to the promotion of blue infrastructure included in the draft policy.</p> <p>One respondent requests that opportunities relating to the Nature Recovery Network and wider ecological networks are mapped as part of the plan. This respondent also requests that the draft policy provides clarity about how developers can support improvements to these networks. The respondent also requests clarification about how improvements of this type would contribute to the achievement of biodiversity net gain.</p> <p>Six respondents state that the description of existing green infrastructure in the plan area as important, is imprecise. These respondents also state that the</p>	<p>support nor objection)</p>
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<p>requirement to retain existing green infrastructure does not recognise the role of mitigation where it is not possible or desirable to retain existing features. Five of these respondents, and one other respondent, also suggest amending the draft policy in relation to enhancing opportunities to access nature by requiring this only where it is possible and viable.</p>	
<p>Comments in relation to the approach to long-term management and maintenance in Draft Policy BG1</p> <p><i>Comments neither in support nor objection (2):</i> One respondent suggests that the draft policy language should be strengthened. This respondent states that the approach should go beyond an expectation to the manage and maintain green infrastructure at developments, and instead should explicitly require this. The respondent also suggests that a maintenance plan template is prepared in relation to green infrastructure, to support the application of the draft policy.</p> <p>Another respondent suggests that BCC commits to the monitoring of, or requires, reporting on the management and maintenance of green infrastructure, Nature Recovery Networks and wider ecological networks.</p>	<p>141, 192 (neither in support nor objection)</p>
<p>Comments in relation to the approach to Green Infrastructure Statements in Draft Policy BG1</p> <p><i>Comments neither in support nor objection (6):</i> Six respondents suggest that the requirement for a Green Infrastructure Statement could be included within an updated version of the BCC's validation checklist. These respondents suggest that guidance could be provided about the level of detail expected in such statements for different types of application.</p>	<p>162, 165, 171, 184, 193, 201 (neither in support nor objecting)</p>
<p>Comments in relation to the approach to standards for major developments in Draft Policy BG1</p> <p><i>Comments in support (1):</i> One respondent supports the promotion in the draft policy of the use of green infrastructure standards, such as Building with Nature.</p> <p><i>Comments objecting (1):</i> One respondent suggests the policy text relating to the Building with Nature standards is incorrect. The text does not include reference to climate change, wildlife, wellbeing and water which are topics that are also covered by standards.</p> <p><i>Comments neither in support nor objection (4):</i> Three respondents request clarity about the variety, range and level of accreditation that major developments will be expected to achieve to ensure that the nature conservation provisions of the draft policy are met. One of these respondents suggests that meeting these standards should be encouraged, rather than expected. Another respondent similarly requests clarity on this matter. This respondent notes that the approach of the draft policy to encourage the use of these types of assessment tools needs to be justified and benchmarked against a range of sites to demonstrate appropriateness. This respondent states that the Building with Nature standards are not always suitable, particularly for urban redevelopments, and therefore meeting the relevant standards could be challenging at major developments in the city.</p>	<p>141 (support)</p> <p>9 (object)</p> <p>116, 117, 121, 177 (neither in support nor objection)</p>

Overview: In total two statutory bodies and partnerships made comments regarding Draft Policy BG1. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 19 Comments from statutory bodies and partnerships

Consultee	Reference
General comments about Draft Policy BG1: Green infrastructure and biodiversity net gain	
<p>Natural England: Respondent states that the scope of the draft policy should be expanded to incorporate the strategic aims of the plan relating to nature and green infrastructure, and not only site-level protection and enhancement. Respondent also states that it is not clear if the expectations in the draft policy text are requirements or merely aspects of green infrastructure that developments should try to achieve. Respondent highlights areas of greatest deprivation in the city in terms of access to open space and health and wellbeing and states that the draft policy should include a focus on increasing greenspace where there are existing areas of under-provision.</p> <p>The development of mostly brownfield sites in Bristol will place an increased importance on green infrastructure for creating healthy, attractive and climate resilient places. Respondent suggests that the application of the urban greening factor is the most effective solution in terms of promoting green infrastructure.</p>	Ref 208
<p>South Gloucestershire Council: Respondent states that the chapter title within which policy BG1 lies could be amended to 'Green (and Blue) Infrastructure, Biodiversity and Nature Recovery'. Respondent also suggests that reference to green and blue infrastructure and its multiple benefits and its importance to Bristol should be included in the introduction to the draft policy. The introduction could also include reference to the relevant plans for green infrastructure and nature recovery at a regional level.</p>	Ref 465
Comments in relation to the approach to the provision of green infrastructure in new developments included in Draft Policy BG1	
<p>Natural England: Respondent suggests that minimum standards for the provision of integrating green infrastructure features should be included. Further wording changes are suggested so that developments take 'all' available opportunities to deliver multifunctional benefits relating to green infrastructure. Respondent also suggests that clarity should be provided about what is the requirement for developments to incorporate appropriate multifunctional green infrastructure and provide appropriately for recreational access. The Natural England Green Infrastructure Standards are suggested to ensure that new provisions are of an appropriate quantity and quality.</p>	Ref 208
<p>Environment Agency: Respondent supports the requirement for developments to take opportunities for the delivery of multifunctional green infrastructure features to achieve a range of benefits, including flood risk management.</p>	Ref 218

11. Draft Policy BG2: Nature conservation

Overview: In total, 36 respondents made 47 comments regarding Draft Policy BG2. Key themes are identified below.

Table 20 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy BG2: Nature conservation</p> <p><i>Comments in support (7):</i> Seven respondents note general support for draft policy BG2. One of these respondents states that the draft policy is proportionate in the context of future growth and opportunities in the city.</p> <p><i>Comments objecting (1):</i> One respondent states that the draft policy lacks clarity and will not have a positive impact, instead allowing for development within ecologically sensitive areas.</p> <p><i>Comments neither in support nor objection (17):</i> The Bristol Parks Forum states that the draft policy is open to interpretation and that a definition of mitigation needs to be included. This respondent also requests clarity about how ecological connectivity will be reflected in decision making, in relation to proposed mitigation and how the preferred policy approach will help to maintain and enhance the nature network. It is suggested that the draft policy should include a statement about the provision of compensation and enhancement at new developments.</p> <p>Several respondents suggest approaches to strengthen the draft policy. These include:</p> <ul style="list-style-type: none"> • Stating that any adverse effect upon designated sites will not be permitted unless mitigation criteria can be met. • Stating that mitigation is required, not only for development that accords with the plan, but also for development allowed at appeal that may not be in accordance with the plan. • Requiring developers to demonstrate how their proposals for biodiversity net gain connect to wider networks, such as wildlife corridors. • Removing 'appropriate' in relation to ensuring the protection of the most valuable ecological habitats and species. • Replacing 'expected' and conditional language with 'must'. • Including support for specific types of biodiversity improvement such as bee and swift bricks, water butts, hedgehog highways, bird and bat boxes, bug and insect hotels. • Producing an SPD to ensure effective delivery of biodiversity improvements and linking to the Bristol Biodiversity Action Plan. • Supporting the expansion of wildlife areas with restricted access to minimise disturbance by humans and prioritising large planting areas over individual planters. • Making clear that the Bristol Avon is functionally connected to the River Severn and Avon Gorge and provides spawning and feeding habitats for key protected fish species. <p>One respondent notes that the draft policy will need to be effectively enforced and suggests that the draft policy should highlight that new biodiversity gain</p>	<p>100, 129, 179, 261, 272, 302, 386 (support)</p> <p>219 (object)</p> <p>49, 126, 127, 131, 136, 141, 162, 170, 171, 177, 192, 201, 208, 265, 343, 363, 459 (neither in support nor objecting)</p>

Key Themes	Respondent Reference
<p>cannot compensate for biodiversity loss, in all scenarios. Another respondent states that the draft policy should be used for the refusal of planning applications on sites that act as ecological connections, given that the loss of this function cannot be mitigated.</p> <p>Three respondents request that the first paragraph of the draft policy is reworded, to avoid the implication that any proposals that result in any impact or harm will be considered unacceptable, regardless of mitigation or other benefits.</p>	
<p>Comments in relation to the approach to survey and design/siting requirements included in Draft Policy BG2</p> <p><i>Comments objecting (5):</i> Five respondents object to the requirement for the mitigation of impacts relating to the nature conservation value of protected sites and species to be additional to the achievement of biodiversity net gain. One of these respondents also states that the draft policy is too imprecise for development control purposes.</p> <p><i>Comments neither in support nor objection (4):</i> Three respondents suggest approaches to strengthen the draft policy. These include:</p> <ul style="list-style-type: none"> • Expanding the draft policy so that it does not only refer to development that is in accordance with the plan, but also addresses development allowed at appeal. • Replacing ‘expected’ and conditional language with ‘must’. • Making direct reference to the ecological and biodiversity surveys required to support planning applications. <p>One respondent states that off-site mitigation should only be provided when the loss of nature conservation or biodiversity is unavoidable, in line with the mitigation hierarchy included in the NPPF. Furthermore, any off-site mitigation should be additional to the achievement of biodiversity net gain and development resulting in measurable harm to biodiversity should not be permitted.</p>	<p>162, 165, 171, 185, 201 (object)</p> <p>80, 130, 177, 210 (neither in support nor objecting)</p>
<p>Comments in relation to the approach to designated sites – hierarchy included in Draft Policy BG2</p> <p><i>Comments neither in support nor objection (13):</i> One respondent questions whether a site of local conservation interest is equivalent to a Site of Nature Conservation Interest (SNCI). Similarly, another respondent requests that the plan includes a definition of the term local wildlife site. This respondent also requests that reference to the Policies Map is removed from the proposed wording, as the respondent states that the boundaries of the map may be inaccurate.</p> <p>One respondent queries how cumulative impacts of development on the designated sites of the city will be considered. A further respondent states that the draft policy would benefit from a less restrictive focus on the hierarchy and should instead refer to the concept of nature corridors.</p> <p>Five respondents state that the draft policy is not consistent with NPPF paragraph 180. They request that the draft policy instead states that development should not, rather than will not, be permitted if it would have a harmful impact on designated sites, unless there is mitigation, or the benefits of this development outweigh its impacts.</p>	<p>12, 66, 117, 130, 162, 165, 171, 179, 185, 192, 201, 231, 463 (neither in support nor objecting)</p>

Key Themes	Respondent Reference
<p>One respondent states that it is not uncommon for SNCIs to be included within the boundaries of development allocations given that the framework for SNCI selection and retention considers a much broader set of criteria than simply the ecological value of a site.</p> <p>Another respondent states that the draft policy should allow development on designated sites if there are regional or national strategic reasons, as long as mitigation or compensation is achieved. This respondent also states that designated sites that sit lower in the mitigation hierarchy, should receive a level of protection that is proportionate to their assumed value.</p> <p>One respondent states that the supporting text of the policy should include reference to nature sites being designated by the Local Site Partnership according to strict criteria, instead of referring to them simply being identified.</p>	

Overview: In total two statutory bodies and partnerships made comments regarding Draft Policy BG2. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 21 Comments from statutory bodies and partnerships

Consultee	Reference
General comments about Draft Policy BG2: Nature conservation	
Natural England: Respondent states that the draft policy should refer to nature recovery instead of nature conservation. This approach will better recognise the wider expectations placed on plans to strategically plan for the natural environment, as well for green infrastructure, health and climate.	Ref 208
Comments in relation to the approach to the designated sites hierarchy included in Draft Policy BG2	
North Somerset Council: Respondent states that the draft policy should distinguish between the hierarchy of international, national and locally designated sites as required by paragraph 175 of the NPPF.	Ref 463

12. Draft Policy BG3: Achieving biodiversity gains

Overview: In total, 45 respondents made 53 comments regarding Draft Policy BG3. Key themes are identified below.

Table 22 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy BG3: Achieving biodiversity gains</p> <p><i>Comments in support (8):</i> Two respondents note general support for the draft policy. One respondent supports the strength of the draft policy language and suggests that this could be enhanced by producing an SPD detailing the preferred biodiversity net gain delivery approach and the approach to contributing to strategic nature recovery. Two respondents suggest guidance is included in relation to how biodiversity net gain should be achieved on-site, including operational practices.</p> <p>One respondent supports the draft policy approach of recognising that biodiversity net gain may not always be possible on-site and that in some circumstances will need to be achieved by alternative means. Another respondent supports the approach of including requirements for biodiversity net gain. This respondent also notes that the potential challenges of implementing the policy are not yet well understood. This includes the potential cost of achieving biodiversity net gain, the availability of land in the city for this function and the potential administrative burden of assessing the draft policy requirement.</p> <p><i>Comments objecting (1):</i> One respondent states that the concept of biodiversity net gain is a form of greenwashing.</p> <p><i>Comments neither in support nor objection (29):</i> Two respondents request clarification in relation to draft policy wording. The clarifications sought include:</p> <ul style="list-style-type: none"> • The time-period which management plans need to cover and how this would be monitored. • Where the legal responsibility for delivering biodiversity net gain lies if the landowner and developer are different. • The criteria used to determine if off-site biodiversity net gain or compensation is considered to be an acceptable approach. <p>One respondent states that biodiversity net gain should be a condition attached to a planning application, rather than a validation requirement. This respondent also states that the requirement to achieve biodiversity net gain in addition to the mitigation of effects relating to biodiversity will be financially challenging.</p> <p>Eight respondents question whether this draft policy is necessary given that provisions for biodiversity net gain are included in the Environment Act 2021. Several of these respondents also state that there could be conflict between the provisions of the Act and the approach of the plan. Some of these respondents state that developments providing more than 10% biodiversity net gain should be looked upon more favourably.</p>	<p>109, 141, 150, 179, 208, 261, 272, 361 (support)</p> <p>71 (object)</p> <p>9, 12, 49, 93, 111, 116, 121, 127, 131, 136, 162, 165, 170, 171, 177, 184, 185, 193, 201, 210, 228, 234, 265, 378, 392, 421, 432, 458, 465 (neither in support nor objecting)</p>

<p>One respondent is concerned about the challenge of meeting the requirement for 10% biodiversity net gain on small sites where viability issues may arise. This respondent suggests that the plan might be supported by guidance relating to this issue. Another respondent suggests that the requirements of the draft policy should be applied flexibly for sites with heritage constraints.</p> <p>Five respondents note that the approach to biodiversity net gain looks for relative improvement, rather than using an absolute scale. These respondents suggest that it would be preferable to require developers to either achieve 10% biodiversity net gain at developments or to meet the requirements of a suitably determined minimum score for biodiversity for the city. These respondents suggest that developers should be required to take whichever of these approaches would achieve greater improvements in biodiversity.</p> <p>Another respondent suggests the draft policy is reworded to ensure that the standards are adhered to and are not treated as merely aspirational.</p> <p>Six respondents state that a higher target for biodiversity net gain should be required. One of these respondents also suggests that the draft policy title should explicitly refer to biodiversity net gain, and that the avoidance of biodiversity loss should be prioritised in the policy. One of these respondents also suggests that the draft policy should explicitly state that all new developments will be required to achieve biodiversity net gain.</p> <p>A further respondent requests explicit reference to ancient woodland and veteran trees. This respondent states that development should be refused permission if it impacts upon these features, and that biodiversity net gain should be additional to mitigation and compensation.</p>	
<p>Comments in relation to the approach to demonstrating the ability to achieve biodiversity net gain through a Biodiversity Gain Plan included in Draft Policy BG3</p> <p><i>Comments objecting (1):</i> One respondent states that the draft policy approach should be updated to require that all baseline and post-intervention on-site habitat units are identified, on- or off-site. This respondent also requests that the draft policy requires Baseline Biodiversity Metric surveys to be undertaken for the locations where offsite biodiversity gain is going to be achieved. The respondent also suggests that a Landscape and Ecological Management Plan should be required to identify how the condition of any habitats created and enhanced will be maintained. This would replace the requirement for the preparation of a Biodiversity Gain Plan.</p> <p><i>Comments neither in support nor objection (2):</i> One respondent suggests that BCC should establish a framework for the assessment of biodiversity net gain, with developers required to fund an independent assessment as part of the application process.</p> <p>One respondent requests more information on how the requirement for the preparation of Biodiversity Gain Plans, to include detail on appropriate management measures for habitats, would be enforced.</p>	<p>130 (object)</p> <p>66, 219 (neither in support nor objecting)</p>

<p>Comments in relation to the approach to the Biodiversity Gain Mitigation Hierarchy included in Draft Policy BG3</p> <p><i>Comments objecting (5):</i> Four respondents object to the approach of the draft policy stating that it risks exporting biodiversity away from areas where it is needed. Two of these respondents request details about the decision-makers who will decide that biodiversity net gain can be provided off-site. One of these respondents also states that biodiversity net gain needs to be safeguarded beyond the 30-year period outlined.</p> <p>One respondent objects to the approach of requiring compensation measures where biodiversity net gain cannot be achieved within the site, stating that these could limit the achievement of biodiversity net gain in the city.</p> <p><i>Comments neither in support nor objection (7):</i> Two respondents request clarifications, as follows:</p> <ul style="list-style-type: none"> • A definition of “last resort” that is referred to in the draft policy in relation to off-site habitat payment compensation. • Confirmation about how close off-site biodiversity net gain would required be to the site. <p>One of these respondents also requests that this draft policy be strengthened by removing any conditional language or caveats. This respondent also notes that providing compensation for biodiversity loss can be easier for developers than providing on-site biodiversity net gain, and that mitigating the loss of ecological connectivity can be challenging.</p> <p>Another respondent states that the draft policy should prioritise the protection of biodiversity above their replacement.</p> <p>One respondent suggests that the draft policy should refer to the Bristol Avon Catchment Plan 2022-2027, in relation to directing proposed habitat and compensation measures towards opportunity projects. Another respondent states that the draft policy should refer to biodiversity remediation and compensation in relation to all types of habitats, not only designated and non-designated sites. This respondent also suggests that greater clarity should be included in relation to providing offsite habitat payment only as a last resort and that this provision must comply with the Biodiversity Metric target. Furthermore, the order of the biodiversity net gain mitigation hierarchy should be detailed in the plan. This respondent also suggests that the draft policy should require that off-site gains are provided within one mile of a development site.</p> <p>One respondent notes that where it is challenging to deliver biodiversity net gain on-site, there should be a formal mechanism to enable developers to make payments to enhance the Nature Recovery Network. Another respondent states development resulting in biodiversity loss should not be permitted.</p>	<p>80, 136, 177, 219, 428 (object)</p> <p>121, 126, 130, 147, 192, 210, 432 (neither in support nor objecting)</p>
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Overview: In total two statutory bodies and partnerships made comments regarding Draft Policy BG3. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 23 Comments from statutory bodies and partnerships

Consultee	Reference
General comments about Draft Policy BG3: Achieving biodiversity gains	

Consultee	Reference
Natural England: Respondent welcomes the approach of BCC taking further guidance to reflect the West of England Biodiversity Net Gain Guidance. Natural England suggests that BCC include Bristol's parks and greenspaces as urban habitat banks for biodiversity net gain units, ensuring that any impacts on biodiversity by developments within Bristol are adequately mitigated in areas close to proposals.	Ref 208
Bath and North East Somerset Council: Respondent notes the potential opportunity for joint working arising in respect to large-scale development close to the authorities' shared boundary and the potential for use of land within Bath and North East Somerset to help meet biodiversity net gain requirements.	Ref 228
South Gloucestershire Council: Respondent states that in the context of the West of England's strategy for nature recovery, it will be important to maintain joint working with regards to the draft policy approach to and the delivery of any off-site biodiversity net gain provision that cannot be achieved on development sites within Bristol.	Ref 465

13. Draft Policy BG4: Trees

Overview: In total, 50 respondents made 69 comments regarding Draft Policy BG4. Key themes are identified below.

Table 24 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy BG4: Trees</p> <p><i>Comments in support (8):</i> Five respondents expressed overall support for the draft policy and suggest a number of minor changes to strengthen it. These include:</p> <ul style="list-style-type: none"> • Emphasising the role of tree planting in promoting climate resilience. • Changing the language of ‘considering’ trees as assets, to describing trees as assets. • Recognising the food growing potential of trees. • Ensuring that the approach is framed as a requirement and not an expectation. <p>One of these respondents also states that there are currently not enough trees in East Bristol. Another respondent supports the approach of promoting the incorporation of street trees where practicable. A further respondent supports the noting of the important role trees play for local residents in relation to air quality and visual amenity.</p> <p><i>Comments objecting (1):</i> One respondent objects to the draft policy stating that it does not do enough to address the lack of trees in some areas, or to recognise the role of trees in climate resilience. The respondent also notes that there is no reference to the proposed Bristol Tree Strategy and would do little to improve enforcement where planning breaches occur in relation to impacts on trees.</p> <p><i>Comments neither in support nor objection (8):</i> The Bristol Tree Forum requests that the draft policy text is strengthened to highlight the importance of trees in national policy.</p> <p>The Woodland Trust suggests that the draft policy should refer to the Ancient Woodland and Ancient Tree Inventory, as well as Bristol's urban forest as part of the wider West of England Nature Recovery Network. This respondent also suggests that the draft policy could note the unequal distribution of trees in Bristol, with a lack of trees often correlating with areas of higher deprivation.</p> <p>One respondent suggests that the draft policy should be cross-referenced to draft policy T1 included in the Draft Policies and Development Allocations document (2019). This respondent also suggests that the draft policy should be cross-referenced with the Healthy Streets Design Check tool, which includes guidance in relation to the provision of shade.</p> <p>One respondent states that the draft policy could do more to protect woodland trees.</p>	<p>129, 141, 150, 155, 179, 210, 247, 286 (support)</p> <p>428 (object)</p> <p>62, 130, 136, 148, 183, 215, 265, 321 (neither in support nor objection)</p>

<p>One respondent states that the draft policy should address issues pertaining to trees in the urban context, including issues such as using native species and best practice to safeguard trees planted in grey infrastructure / hard landscaping.</p> <p>Another respondent states that more street trees are needed in Bristol. A further respondent states that at present there are not enough trees in East Bristol, without noting support or objection to the draft policy.</p>	
<p>Comments in relation to the approach to the provision of trees included in Draft Policy BG4</p> <p><i>Comments in support (1):</i> One respondent supports the benefits that the draft policy will help achieve through the provision of new trees. These are stated to include increased heat resilience, shading canopies, flood mitigation and visual appeal. This respondent also suggests that trees might be incorporated into the carriageway rather than providing them on the pavement and reducing the amount of space for pedestrians.</p> <p><i>Comments neither in support nor objection (13):</i> Three respondents suggest that the selection of trees to be provided as part of landscaping should have regard to the following:</p> <ul style="list-style-type: none"> • Whether they are native species, to reduce the risk of diseases being spread. • Whether they can act to provide shade, including at watercourses. • Whether they are resilient to climate change. • The contribution they make to microclimates and pollen counts. <p>Two respondents note there is no tree canopy cover target included in the draft policy, and suggest that best practice is the achievement of approximately 25% coverage. One of these respondents also suggests that the draft policy should require applicants to use a BS5837 tree survey to assess existing canopy cover area. One further respondent states that existing condition surveys should be undertaken by a competent individual registered with a professional body.</p> <p>Another respondent notes that in some new developments, trees are planted in small back gardens, and are then removed by the occupiers as they impinge on the amenity of the garden.</p> <p>Six respondents request that the draft policy is amended to only require new streets to be tree-lined where feasible or viable. It is stated that there may be amenity reasons, such as overshadowing, which could lead to trees being undesirable in certain places.</p>	<p>57 (support)</p> <p>12, 126, 141, 162, 165, 170, 171, 177, 184, 192, 201, 261, 361 (neither in support nor objecting)</p>
<p>Comments in relation to the approach to the protection and replacement of trees included in Draft Policy BG4</p> <p><i>Comments in support (2):</i> One respondent supports the requirement of the draft policy for replacement trees to be planted as close as possible to the development site.</p> <p><i>Comments objecting (9):</i> One respondent states that urban trees are needed across the city, and the draft policy does not support this.</p> <p>Two respondents object to the tree replacement standard given that it allows trees with a trunk diameter of below 15cm not to be replaced. One of these respondents states that any trees that are lost as part of development should be</p>	<p>155, 465 (support)</p> <p>131, 175, 218, 291, 321, 378, 428, 432, 459 (object)</p> <p>49, 80, 100, 121, 130, 136, 141, 154, 162, 165, 170, 171,</p>

<p>replaced by a multiple of three or four. One respondent states that allowing mature trees to be replaced does not reflect their wider biodiversity value. This respondent states that developers should have to demonstrate they have considered design measures to avoid the removal of trees.</p> <p>Two respondents object to the draft policy given that it includes an allowance for developers to make financial payments to compensate for the loss of trees. These respondents suggest that developers should be required to provide land for replacement trees.</p> <p>Two respondents object to the draft policy as it allows trees to be removed, and one of these respondents states that this should only occur if the approach is agreed to by a wildlife expert.</p> <p><i>Comments neither in support nor objection (27):</i> The Bristol Tree Forum states that the draft policy should be cross-referenced with the requirements for biodiversity net gain set out in draft policy BG3. They also state that the approach should clarify that replacement trees should only be acceptable where tree loss or damage is essential, and not expedient. This respondent suggests an alternative Tree Replacement Standard and that replacement trees should be provided within one mile of the development site. The number of trees lost, their identities and their replacements should be recorded in the planning permission and/or Section 106 Agreement.</p> <p>The Woodland Trust states that the draft policy approach should be for trees to be retained, unless they pose a risk to safety. This respondent also provides context about the benefits of mature trees. They state that the Tree Replacement Standard should be widened to include the wider benefits of trees, as opposed to being limited to an approach based on diameter.</p> <p>Eight respondents request clarifications which include:</p> <ul style="list-style-type: none"> • The criteria to be used to determine whether tree loss is essential to allow for development, and who will make this decision. • The definition of important trees. • The evidence supporting the Tree Replacement Standard. • How the approach to replacing trees with over 80cm in diameter will work. • The link between the tree replacement standard and protections for ancient and veteran trees. <p>Of these respondents, three note that the approach should be expanded to consider all trees, not just important trees. Two of these respondents are concerned that the draft policy approach will result in tree canopy cover being exported away from developments. Another of these respondents suggests tripling the Tree Replacement Standard quotas, and that 25% of all planting (excluding orchards) should be edible. Another of these respondents states that planning permission should be refused if developers pre-emptively destroy all the trees on a site.</p> <p>One respondent states that there are areas of Bristol with poor tree cover and no new development planned, and therefore off-site tree provision should be spread</p>	<p>177, 179, 183, 184, 185, 192, 193, 201, 210, 219, 261, 265, 362, 386, 446 (neither in support nor objecting)</p>
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<p>across the city based on greatest need, rather than placed in close proximity to new development.</p> <p>One respondent suggests that the draft policy should pertain to all landscaping, not just trees.</p> <p>Another respondent suggests that the retention of trees should be emphasised more strongly. This respondent and another respondent states that any removal of trees should be supported by an arboricultural assessment.</p> <p>Three respondents state that the draft policy should require that no development which affects ancient or veteran trees should be permitted. One of these respondents also states that an updated Tree Replacement Standard should be included, and that the retention of existing mature trees should be considered before any replacement. This response also states that hedgerows and urban hedgerows should be given protection through the draft policy.</p> <p>One respondent states that the removal of any trees should only be allowable if it is essential to develop the site where they are located, and the new development cannot be designed in such a way as to retain the trees. A further respondent notes that there could be reasons of regional or national significance that may require the removal of trees, and that this should be allowed alongside mitigation and compensation.</p> <p>Seven respondents state that the draft policy requirements should only be applicable where feasible and viable, and that a financial contribution should be acceptable should providing replacement tree planting on-site prove not to be possible. They state that the replacement of a poor-quality tree may be preferable to retention, especially as there would be a long-term increase in canopy cover. Some of these respondents also note that the draft policy requirement regarding ancient woodland and veteran trees should be consistent with paragraph 183 of the NPPF to allow for development where there are exceptional reasons and suitable compensation.</p> <p>One respondent suggests that trees are logged in an online resource and requests a resource is provided to notify neighbours about the removal of mature trees. This respondent states that replacement trees should be chosen for their benefits relating to biodiversity and climate change resilience.</p>	
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Overview: In total three statutory bodies and partnerships made comments regarding Draft Policy BG4. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 25 Comments from statutory bodies and partnerships

Consultee	Reference
General comments about Draft Policy BG4: Trees	
Wessex Water: Respondent states that the draft policy should have regard to installation of tree pits as a SuDS feature. The draft policy should identify the need for proposed street trees to be located where they will not impact on underground services, including sewers and lateral drains. This approach is suggested to reduce surface water run-off in urban areas and limit the potential for repair works to sewers to necessitate the removal of trees.	Ref 148

Consultee	Reference
Comments in relation to the approach to the protection and replacement of trees included in Draft Policy BG4	
Environment Agency: Respondent states that any tree placement which would adversely impact operational access to a designated Main River or result in an increase in flood risk must be avoided and that the Environment Agency are unlikely to grant a Flood Risk Activity Permit in such a situation. Respondent states that the draft policy should be strengthened to reflect this.	Ref 218
South Gloucestershire Council: Respondent supports the approach of using a tree replacement calculation that is consistent with what is used by South Gloucestershire.	Ref 465

14. Draft Policy BG5: Biodiversity and access to Bristol's waterways

Overview: In total, 26 respondents made 35 comments regarding Draft Policy BG5. Key themes are identified below.

Table 26 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy BG5: Biodiversity and access to Bristol's waterways</p> <p><i>Comments in support (6):</i> One respondent notes general support for the draft policy. Another respondent who supports the overall approach of the policy, suggests including increased linkages to requirements for flood resilience.</p> <p>One respondent supports the benefits of the draft policy in relation to the health of Bristol's waterways and habitats, with associated benefits for nature and people. This respondent also notes that there could be more explicit reference to protecting and improving freshwater ecology, and to removing redundant weirs, culverts and other instream obstructions to fish movement.</p> <p>One respondent supports the draft policy as it will create continuous routes for people walking, cycling, and wheeling.</p> <p>One respondent supports the omission of requiring public access to the Bristol Port area due to safety and security reasons.</p> <p><i>Comments objecting (3):</i> One respondent states that the draft policy needs to include more precise standards and criteria so that it can be used for the assessment of development proposals. Another respondent states that there is too great a focus on walkways and increased emphasis is needed in relation to biodiversity and nature recovery.</p> <p><i>Comments neither in support nor objection (11):</i> One respondent states that the draft policy should reflect the increased potential for active and leisure uses, as well as the regeneration potential of the waterways and frontages.</p> <p>Another respondent notes the benefits that tree-lined banks can provide in terms of ecology and structural stability. One respondent suggests the draft policy should also support new green spaces along the waterways.</p> <p>Five respondents state that the draft policy should be more flexible and consistent with national policy, and should be presented to the Environment Agency to ensure there are no conflicts. These respondents state that the policy in its current form, would prevent any development that does not conserve the nature conservation value of waterways and adjacent land, regardless of biodiversity net gain provisions.</p> <p>One respondent states that safety must be priority that is promoted by the policy and that walkways at waterfronts must be appropriately lit.</p>	<p>126, 129, 141, 179, 208, 459 (support)</p> <p>218, 219, 343 (object)</p> <p>7, 109, 121, 130, 136, 162, 165, 171, 201, 228, 261 (neither in support nor objection)</p>
<p>Comments in relation to the requirements for proposals adjacent to or containing waterways included in Draft Policy BG5</p>	<p>57, 183 (support)</p>

<p><i>Comments in support (2):</i> One respondent supports maximising the approach of the draft policy which is expected to improve health of the waterways and promote nature and wildlife. Another respondent particularly supports the provision of green infrastructure at waterway locations for walking and cycling.</p> <p><i>Comments neither in support nor objection (8):</i> Five respondents state that the requirement for green infrastructure provision in this draft policy should only be where this type of provision is feasible and viable, and that the requirement to deliver biodiversity net gain in a specific part of the site is impractical.</p> <p>One respondent suggests the draft policy should also prevent the use of materials which could be harmful to water quality, and that there should be year-on-year measurements of water and biodiversity quality, to ensure management goals are being met.</p>	121, 162, 165, 170, 171, 201, 208, 218 (neither in support nor objection)
<p>Comments in relation to the approach to City Centre quayside walkways included in Draft Policy BG5</p> <p><i>Comments in support (1):</i> One respondent supports the draft policy approach of promoting the creation of active frontages along quayside walkways and pedestrian access to the waterways. This respondent requests that the draft policy supports the provision of signage and the provision of seating and public realm improvements in these areas.</p> <p><i>Comments neither in support nor objection (4):</i> Three respondents request clarity about where the Policies Map showing the existing quayside walkways can be found.</p>	57 (support) 49, 80, 177, 208 (neither in support nor objection)

Overview: In total four statutory bodies and partnerships made comments regarding Draft Policy BG5. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 27 Comments from statutory bodies and partnerships

Consultee	Reference
General comments about Draft Policy BG5: Biodiversity and access to Bristol's waterways	
Marine Management Organisation: Respondent states that relevant policies in the South West Marine Plan should be considered as part of the decision-making functions of BCC.	148
Natural England: Respondent supports the general approach of the draft policy in relation to protecting the existing and potential value of Bristol's waterways in relation to both people and nature. Respondent notes the multiple benefits of blue infrastructure including improvements to natural flood management, ecology, health, cooling and active transport routes where areas of riverside greenspace are connected. Respondent supports the draft policy approach in relation to retaining and enhancing these benefits.	208
Environment Agency: Respondent states that the draft policy should be revised to include the need to ensure new development is set back from the river and land is safeguarded to assist with the delivery of the emerging Bristol Avon Flood Strategy.	218
Bath and North East Somerset Council: Respondent states that development within Bristol along or close to the River Avon may have flood risk impacts upstream within the Bath and North East Somerset area. Therefore, there is a need for continual dialogue between the two authorities on flood risk matters.	228

Consultee	Reference
Comments in relation to the requirements for proposals adjacent to or containing waterways included in Draft Policy BG5	
Natural England: Respondent states that all new waterside development should provide new and enhanced green infrastructure along the river's edge to contribute to access to green spaces and to benefit natural flood risk management.	208
Environment Agency: Respondent states that the approach to avoiding culverting and opening up culverted watercourses is supported. However, the draft policy should also set out the appropriate setback distance of new development from waterways.	218
Comments in relation to the approach to City Centre quayside walkways included in Draft Policy BG5	
Natural England: Respondent states that greater detail is needed in the draft policy regarding what constitutes appropriate contributions towards a continuous and accessible quayside walkway route.	208

15. Draft Policy FS1: The provision of allotments

Overview: In total, 48 respondents made 55 comments regarding Draft Policy FS1. Key themes are identified below.

Table 28 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy FS1: The provision of allotments</p> <p><i>Comments in support (24):</i> Eight comments received note general support for the draft policy. However, one of these comments questions whether developers will try to avoid these requirements on the grounds of viability. Another one of these comments states that the draft policy could also include support for allotment provision at commercial developments. A further comment suggests that the policy includes text to highlight the benefits of healthy soil and food growing in the city in relation to health and wellbeing, and climate change. This comment also suggests that the types of spaces that are protected by the draft policy should be widened to include community growing spaces/gardens, food growing enterprises, smallholdings and social eating spaces.</p> <p>One respondent states that development should be designed so that small scale vegetable cultivation is possible and suggests that this land is not lost to car parking and other uses. A further respondent notes that there is a good supply of allotments in their area (Westbury on Trym) and would like to see other areas have similar resources.</p> <p>Twelve other respondents highlight the benefits of allotments in terms of heritage, mental and physical health, food cost and sustainability and biodiversity.</p> <p><i>Comments objecting (9):</i> Eight comments state that given the make-up of Bristol, allotments will likely be on brownfield land and therefore the ground conditions at many locations will not be favourable. Furthermore, this approach would lead to a relatively wide distribution of allotments leading to inefficiencies in terms of the infrastructure needed for maintenance (e.g. water supply, access and parking). These respondents suggest that the draft policy should, instead, support developers providing on-site allotment spaces and that the strategic demand for allotments should be financed via Community Infrastructure Levy (CIL) or as part of a larger cluster of allotments.</p> <p>Another comment states that allotment provision in the city will decrease the area that can be developed for housing. Furthermore, although the draft policy refers to the requirement to provide a statutory allotment, they are unaware of relevant legislation addressing this land typology.</p> <p><i>Comments neither in support nor objection (6):</i> One comment suggests that the draft policy could be combined with draft policy FS2 to support growing opportunities on development sites in lieu of off-site or financial contribution.</p> <p>One respondent notes that the provision of allotments may be difficult at certain sites and that the option for offsite provision may be needed. This respondent</p>	<p>29, 33, 34, 35, 42, 48, 67, 71, 113, 122, 134, 146, 155, 172, 176, 195, 202, 210, 217, 223, 228, 288, 292, 362 (support)</p> <p>93, 147, 162, 165, 171, 184, 185, 193, 201 (object)</p> <p>9, 12, 131, 136, 200, 234 (neither in support nor objection)</p>

<p>suggests that the requirement for delivery might be met through other opportunities for food growing, such as sky gardens or rooftops. The Bristol Parks Forum requests that the draft policy requires that offsite allotment provision and financial contributions should be used to benefit the local area.</p> <p>Two respondents query how the draft policy would apply to BCC-owned properties, student accommodation and other large development such as a block of flats.</p> <p>The Bristol Food Network states that reference should be made to the difference between urban and peri-urban food growing spaces, as well as equivalent food growing space provision beyond allotments.</p>	
<p>Comments in relation to the threshold for requiring statutory allotment plot of 250m² included in Draft Policy FS1</p> <p><i>Comments in support (1):</i> One comment supports the threshold included in the draft policy for the provision of allotment space given that existing facilities of this type are already in high demand in Bristol.</p> <p><i>Comments objecting (14):</i> Five comments object to the approach of the draft policy stating that it is not feasible to deliver on-site allotments as most developments will be required to be high density and will be delivered at urban locations. These respondents, and one other respondent, state that no justification is provided for the 60-unit threshold included in the draft policy.</p> <p>Two respondents (including the Bristol Food Network) suggest that the plot sizes required for larger developments should be increased relative to their size and that guidance should be included in relation to the need for land remediation. One of these respondents also suggests that guidance should also be provided in relation to plot size. Two respondents suggest that there should not be an upper ceiling to the size of allotment.</p> <p>Four respondents state that the threshold for allotment provision should be set lower. One of these respondents suggests that a threshold of 20 dwellings be incorporated in the draft policy.</p> <p><i>Comments neither in support nor objection (1):</i> One respondent states that allotment provision should be subject to viability and requests that clarity is provided about whether larger developments will be required to provide proportionally higher levels of allotment space.</p>	<p>79, (support)</p> <p>49, 75, 80, 129, 131, 162, 165, 170, 171, 184, 185, 192, 201, 210 (object)</p> <p>121 (neither in support nor objection)</p>

Overview: In total one statutory body made comments regarding Draft Policy FS1: The provision of allotments. Detailed comments from that statutory body were provided as follows:

Table 29 Comments from statutory bodies and partnerships

Consultee	Reference
General comments about draft policy FS1: The provision of allotments	
Bath and North East Somerset Council: Respondent notes the requirement in the draft policy for new large-scale developments to provide allotment space for residents and the policy's protection of these sites as valuable community and green infrastructure assets.	Ref 228

16. Draft Policy FS2: Provision of food growing space within new developments of all scales

Overview: In total, 19 respondents made 21 comments regarding Draft Policy FS2. Key themes are identified below.

Table 30 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy FS2: Provision of food growing space</p> <p><i>Comments in support (5):</i> Five comments (including the comment from the Bristol Food Network) note general support for draft policy FS2. One of these comments notes that the draft policy is related to all new residential developments, not only larger proposals. Two more of these respondents suggest that the draft policy could be written to help ensure that a proportion of growing spaces is made fully accessible to all residents.</p> <p><i>Comments objecting (7):</i> Seven comments object to the draft policy stating a threshold should be included, above which on-site food growing space would be required. These respondents also state that the draft policy should include details about the space that needs to be incorporated at developments and that this type of provision should be counted as a contribution to open space and not additional to this.</p> <p><i>Comments neither in support nor objection (8):</i> Two comments suggest that the draft policy could include a requirement for the remediation of land which is to be used for food growing. These comments also suggest that the approach could do more to make food growing space accessible to all, including those with mobility issues.</p> <p>Five comments request that additional clarity is provided in relation to the draft policy. This includes in relation to the definitions of the terms ‘long term occupation’, ‘suitable space’, and ‘appropriate size, quality and design’ included in the policy. Clarity is also requested about whether developments for student accommodation would be subject to the policy’s requirements. Another comment suggests that additional guidance is provided to developers to assist in relation to the interpretation of the draft policy.</p>	<p>129, 131, 155, 208, 210 (support)</p> <p>162, 165, 171, 184, 185, 193, 201 (object)</p> <p>12, 49, 80, 88, 121, 136, 154, 234 (neither in support nor objection)</p>
<p>Comments in relation to the criteria for space for food growing included in Draft Policy FS2</p> <p><i>Comments neither in support or objection (1):</i> One respondent states that the draft policy could specify how much food growing space is required per dwelling or person.</p>	<p>147 (neither in support nor objection)</p>

Overview: In total one statutory body made comments regarding Draft Policy FS2: Provision of food growing space within new developments of all scales. Detailed comments from that statutory body were provided as follows:

Table 31 Comments from statutory bodies and partnerships

Consultee	Reference
<p>General comments about Draft Policy FS2: Provision of food growing space</p> <p>Natural England: Comment in support of Draft Policy FS2. Respondent notes the approach recognises the importance of food growing spaces as part of the green infrastructure network.</p>	<p>Ref 208</p>

17. Draft Policy FS3: The protection of existing food growing enterprises

Overview: In total, 13 respondents made 13 comments regarding Draft Policy FS3. Key themes are identified below.

Table 32 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy FS3: Protection of food growing space within new developments of all scales</p> <p><i>Comments in support (2):</i> Two comments note general support for draft policy FS3. One of these comments suggests that the draft policy could be expanded to support the protection of local community gardens.</p> <p><i>Comments objecting (1):</i> One comment objects to draft policy FS3 stating that it lacks clarity to be effective, is not consistent with national policy and is not justified.</p> <p><i>Comments neither in support nor objection (10):</i> Two comments state that the draft policy and supporting text should be better aligned when describing impacts relating to viability and feasibility.</p> <p>It is suggested by another comment that the draft policy could do more to define what constitutes ‘unacceptable impact’ in relation to impacts on the viability of existing agricultural and local food growing enterprises.</p> <p>The Bristol Food Network states that the draft policy could require the protection of the best and most versatile soils as well as specifying the amount of food growing land being made available for active cultivation ward by ward. This respondent also suggests that the draft policy is redrafted to remove reference to new development being considered acceptable where a current food growing enterprise would cease operation as the present operators do not want to continue. One further respondent suggests that the draft policy should help to preserve food growing enterprises even if they temporarily considered non-operational.</p> <p>Two further responses suggest the protection of productive agricultural soils through the draft policy.</p> <p>One respondent states that the title of the draft policy should be amended so that it addresses the whole local food system and associated infrastructure. This respondent also suggests that the local green space designation should be applied to all food growing sites, allotments, smallholdings, community gardens and agroecological food enterprise sites. The respondent suggests that an SPD addressing food growing, should be prepared by BCC.</p>	<p>155, 170, (support)</p> <p>121 (object)</p> <p>49, 80, 131, 136, 154, 192, 210, 228, 432, 465 (neither in support nor objection)</p>

Overview: In total two statutory bodies and partnerships made comments regarding Draft Policy FS3. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 33 Comments from statutory bodies and partnerships

Consultee	Reference
General comments about Draft Policy FS3: The protection of existing food growing enterprises	

Consultee	Reference
Bath and North East Somerset Council: Respondent notes the implications of the draft policy approach in relation to farms within the Green Belt close to Bath and North East Somerset. In the process of preparing the Bath and North East Somerset Local Plan, further dialogue with BCC on this issue may be necessary.	Ref 228
South Gloucestershire Council: Respondent notes the implications of the policy draft approach in respect of enterprises within the Green Belt close to South Gloucestershire. In the process of preparing the South Gloucestershire Local Plan, further dialogue with BCC on this issue may be necessary.	Ref 465

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

Overview: In total, 54 respondents made 84 comments regarding Draft Policy SSE1. Key themes are identified below.

Table 34 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy SSE1: Supporting Bristol's centres – network and hierarchy</p> <p><i>Comments in support (6):</i> Five respondents note general support for the approach of the draft policy. These comments include the response from Sustrans who support the reference to the concept of 15-minute cities, but would like greater detail about how key services would be located within a 15-minute walking distance for residents, or how this would be guaranteed. This respondent suggests cross-referencing to draft policy T1 included in the Draft Policies and Development Allocations document (2019). Two more of these respondents also support the reference to 15-minute cities, with one stating that the definition of this concept could be more clearly set out.</p> <p>One of these respondents would like specific reference to historic conservation and a commitment to consult local people included as part of the draft policy approach.</p> <p><i>Comments objecting (1):</i> One respondent states that the draft policy does not address the potential for noise pollution and that it permits activities that could result in anti-social effects.</p> <p><i>Comments neither in support nor objection (18):</i> Nine respondents refer to the concept of 15-minute cities. Suggested changes in relation to this concept include:</p> <ul style="list-style-type: none"> • The text relating to the aim of creating a 15-minute city should include reference to health and social care. • The draft policy should be clear about whether the 15-minute city concept applies to all members of the community or only to younger and able-bodied people and whether the approach can be used to ensure those with mobility issues benefit from good access to services and facilities. • The draft policy should seek to ensure that there is enough provision relating to local hospitality uses, with the 15-minute city concept also applying to evening uses, so that these activities are not focussed only in the city centre. • The draft policy should include reference to uses that are likely attract people to high street locations. <p>One respondent states that the plan should fully recognise the existing diversity of town centres as fulfilling important social and community roles, in addition to their retail and economic roles. Furthermore, local community input should be required into the preparation of the vision statements for centres in Bristol.</p> <p>Another respondent states that vision statements and frameworks could be made use of to guide the development of town, district and local centres.</p>	<p>109, 128, 183, 228, 402, 459 (support)</p> <p>219 (object)</p> <p>1, 72, 113, 142, 154, 155, 169, 170, 206, 221, 233, 378, 392, 421, 432, 458, 460, 465 (neither in support nor objection)</p>

Key Themes	Respondent Reference
<p>The Westbury-on-Trym Society also refer to vision statements, stating that these documents are often prepared by consultants without local knowledge. Therefore, this respondent would like to be included in the drafting of any statements relating to their area.</p> <p>One respondent states that residents often drive to supermarkets as local shops have closed, and notes the potential for impacts relating to climate change. Conversely, another respondent states that shopping centres need free parking available as people are put off visiting by the associated costs.</p> <p>One respondent states that suitable community provisions in the city beyond its centre still need to be addressed. Another respondent states that community infrastructure provision should be integral to redevelopment of any new scheme.</p>	
<p>Comments in relation to uses identified as appropriate to be located within or adjoining Bristol's centres included in Draft Policy SSE1</p> <p><i>Comments neither in support nor objection (2):</i> The Bristol Business Improvement Districts – Bristol City Centre, Redcliffe & Temple and Broadmead states that they support the creation of secure cycle parking in the city centre which is not included in the draft policy.</p> <p>One respondent states that a mix of town centre activities is desirable. This respondent also states that there may be a need for a draft policy to ensure that certain uses do not become over concentrated in the city centre. The respondent refers to the example of night clubs and gaming venues.</p>	57, 80 (neither in support nor objection)
<p>Comments in relation to the approach to active uses in centres included in Draft Policy SSE1</p> <p><i>Comments in support (2):</i> The Bristol Business Improvement Districts – Bristol City Centre, Redcliffe & Temple and Broadmead and one other respondent supports the creation and maintenance of active ground floor uses in centres to support their vitality, viability and diversity. The Business Improvement Districts would like to see an increase in active frontages on a number of streets in the city centre. This includes at Rupert St, Lewin's Mead, Baldwin St, Broadweir, Victoria St and Temple Back East.</p> <p><i>Comments neither in support nor objection (2):</i> Two respondents request that the draft policy includes reference to the creation of active frontage in the context of the harm new development of this type may have. This harm is framed in relating to the potential for new development to draw people away from the existing high streets and shopping locations of the city.</p>	57, 127 (support) 111, 458 (neither in support nor objection)
<p>Comments in relation to the approach to residential uses in centres included in Draft Policy SSE1</p> <p><i>Comments in support (6):</i> The Bristol Business Improvement Districts – Bristol City Centre, Redcliffe & Temple and Broadmead supports increased numbers of residents living in the city centre and notes the importance of community amenities and infrastructure to support an increased population.</p> <p>Three respondents support the approach of allowing residential use above commercial properties as making good use of space and part of the approach to resisting ground floor loss of shops to residential uses.</p>	57, 73, 110, 127, 184, 193 (support) 88, 121, 165, 171, 185, 201, 209 (neither in support nor objection)

Key Themes	Respondent Reference
<p>Two respondents support the approach of the draft policy as contributing to intensification of residential development in Bristol's centres and the diversification of urban areas.</p> <p><i>Comments neither in support nor objection (7):</i> Four respondents suggest that the draft policy should require evidence to be provided to demonstrate an excess of supply of commercial units at a given location, to support residential proposals that would result in a consolidation or reduction of commercial frontages.</p> <p>One respondent requests clarity in relation to the approach of encouraging residential development within centres at vacant locations away from commercial frontages.</p> <p>One respondent states that the draft policy wording needs to be strengthened to ensure residential developments do not reduce, remove or diminish the commercial or cultural functions of centres that would otherwise serve the community.</p> <p>Another respondent states that the draft policy needs to be clear that the approach to residential development within centres incorporates build to rent properties and student accommodation.</p>	
<p>Comments in relation to the centre network and hierarchy included in Draft Policy SSE1</p> <p><i>Comments in support (2):</i> One respondent supports protecting local centres and parades in order to reduce car travel and create walkable communities. The other respondent notes general support for the hierarchy of centres set out.</p> <p><i>Comments objecting (1):</i> One respondent objects to this element of the draft policy given that the proposed centre hierarchy may mean that some public houses will be seen as being less important given that they lie outside of a defined centre.</p>	<p>170, 363 (support)</p> <p>169 (object)</p>
<p>Comments in relation to individual centres included in the proposed centre hierarchy included in Draft Policy SSE1</p> <p>Bristol Shopping Quarter (Broadmead) primary shopping area</p> <p><i>Comments neither in support nor objection (1):</i> One respondent requests more information on the approach to ensuring the success of the city centre. The respondent notes particular interest in the Galleries, Broadmead and Park Street.</p>	<p>274 (neither in support nor objection)</p>
<p>Hotwells Road</p> <p><i>Comments neither in support nor objection (1):</i> One respondent states that Hotwells is included as part of the city centre in the centre hierarchy, and that this area needs improved and regenerated services.</p>	<p>386 (neither in support nor objection)</p>
<p>Westbury-on-Trym</p> <p><i>Comments in support (1):</i> The Westbury-on-Trym Society supports the inclusion of Westbury-on-Trym as a town centre. They note the vulnerability of the centre in relation to its recent changes of use. The respondent notes the intention to include 'vision statements' for town centres.</p>	<p>155 (support)</p>

Key Themes	Respondent Reference
Whiteladies Road <i>Comments neither in support nor objection (1):</i> One respondents stated that the Whiteladies Road centre should include additional areas to the south towards Oakfield Road and the Royal West of England Academy.	227 (neither in support nor objection)
Ridingleaze (Lawrence Weston) <i>Comments in support (1):</i> The Lawrence Weston Neighbourhood Planning Forum supports the inclusion of Ridingleaze as a district centre and notes that this area is in need of regeneration. The group is currently working on a plan towards the centre's regeneration. They would welcome this plan being reflected in the Draft Policies and Development Allocations document (2022). The Forum objects to the inclusion of remote order fulfilment centres in small and mixed use residential/retail centres. <i>Comments neither in support nor objection (1):</i> One respondent suggests the pedestrianisation of the high street or the provision of cycle paths along Long Cross.	223 (support) 462 (neither in support nor objection)
Whitchurch (Oatlands Avenue) <i>Comments neither in support nor objection (1):</i> One comment is from a statutory consultee, with further detail provided in the next table in this report.	218 (neither in support nor objection)
Alma Vale Road, Clifton <i>Comments in support (4):</i> Four respondents note general support for the inclusion of Alma Vale Road, Clifton as a local centre. One of these respondents states that the map produced in the Draft Policies and Development Allocations document (2022) is inaccurate and has provided a corrected map. Two of the respondents request that the centre boundary is drawn to include the entire length of shop frontages on both sides of Alma Vale Road.	11, 227, 378, 458 (support)
Filwood Broadway <i>Comments neither in support nor objection (1):</i> The Knowle West Regeneration Residents Planning Group suggest that Filwood Broadway is included as a district centre instead of local centre and would also like a vision statement to be prepared for the centre.	127 (neither in support nor objection)
Bedminster Road <i>Comments neither in support nor objection (1):</i> One comment is from a statutory consultee, with further detail provided in the next table in this report.	218 (neither in support nor objection)
Brislington <i>Comments objecting (1):</i> One respondent objects to further development in Brislington. This respondent states that there is already congestion in the area and that further development could exacerbate the issue.	71 (object)
St. Peter's Rise, Bishopsworth <i>Comments in support (2):</i> One respondent states that more shops and services within the local centre at St. Peter's Rise, Bishopsworth would be beneficial for residents. Another respondent states that the shops further back along Bishopsworth Road and at the junction with Bridgewater Road should also be protected. <i>Comments objecting (1):</i> One comment is from a statutory consultee, with further detail provided in the next table in this report.	48, 363 (support) 218 (object)

Key Themes	Respondent Reference
Stockwood <i>Comments neither in support nor objection (1):</i> One respondent states that Holloway Road is underfunded and needs investment, rather than creating new district centres.	237 (neither in support nor objection)
Leinster Avenue, Filwood <i>Comments in support (1):</i> The Knowle West Regeneration Residents Planning Group supports the addition of Leinster Avenue, Filwood as a new centre.	127 (support)
Church Road/Highridge Road, Bishopsworth <i>Comments neither in support nor objection (1):</i> One comment is from a statutory consultee, with further detail provided in the next table in this report.	218 (neither in support nor objection)
Melvin Square, Knowle West <i>Comments in support (1):</i> The Knowle West Regeneration Residents Planning Group supports the addition of Melvin Square, Knowle West as a new centre.	127 (support)
Two Mile Hill Road <i>Comments objecting (1):</i> One comment is from a statutory consultee, with further detail provided in the next table in this report. <i>Comments neither in support nor objection (1):</i> One respondent states that although the site is listed in this policy, a map of this location is not included in Appendix 2.	465 (object) 456 (neither in support nor objection)
Coldharbour Road <i>Comments in support (1):</i> One respondent supports the designation of Coldharbour Road as a local centre.	432 (support)
West Street, Bedminster <i>Comments in support (1):</i> One respondent supports the identification of West Street, Bedminster as a local centre given that it is a key corridor and is well served by public transport.	457 (support)
Sandy Park Road <i>Comments neither in support nor objection (1):</i> One respondent states that they are opposed to further road infrastructure at Sandy Park Road.	415 (neither in support nor objection)
New centres identified by respondents Five respondents outline locations for the designation of new centres. The locations identified are: <ul style="list-style-type: none"> • Whiteladies Road South (suggested by three respondents); • Kellaway Avenue (suggested by two respondents); and • Ashley Down Road and Cotham Road South. • Broad Plain/Temple Quay. 	11, 57, 392, 421, 432, 458, 459
The approach to the creation of new centres included in Draft Policy SSE1 <i>Comments neither in support nor objection (6):</i> Four respondents state the revitalisation of existing centres should be prioritised over creating new ones, with one respondent stating that new developments might threaten existing high streets. One respondent states that there needs to be a focus on providing new and improving existing non-motorised access to any new centres.	142, 392, 421, 432, 458, 459 (neither in support nor objection)

Overview: In total four statutory bodies and partnerships made comments regarding Draft Policy SSE1. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 35 Comments from statutory bodies and partnerships

Consultee	Reference
General comments about Draft Policy SSE1: Supporting Bristol's centres – network and hierarchy	
National Highways: Respondent states that there is a disconnect between the supporting text of the policy which highlights the benefits of a 15-minute city and the policy text which is more focussed on the centre hierarchy.	Ref 142
Bath and North East Somerset Council: Respondent notes that local centres and parades are identified on the Policies Map and that the draft policy seeks to maintain and enhance active ground floor uses and therefore, the viability of these centres. Dialogue between the two authorities will be necessary in respect of the relationship with and implications for local centre provision associated within any development proposed on land within Bath and North East Somerset close to Bristol.	Ref 228
South Gloucestershire Council: Respondent seeks clarity about where areas for growth and regeneration identified in development strategy sit in the centre hierarchy. Clarity is also sought in relation to the scale and type of retail, leisure, office and other main town centre development likely to be needed in Bristol given that this could affect the potential for new centres in South Gloucestershire. Respondent also queries whether the primary and secondary shopping areas for town, district and local centres will be retained.	Ref 465
Comments in relation to individual centres included in the proposed centre hierarchy included in Draft Policy SSE1	
Whitchurch (Oatlands Avenue) Environment Agency: Respondent states that many sites in Whitchurch and Bishopsworth are at risk of surface water flooding and that liaising with the Lead Local Flood Authority is advisable.	Ref 218
Bedminster Road Environment Agency: Respondent states that the centre is located in Flood Zone 2 with the main flood risk source from the River Malago, a designated Main River. A site-specific Flood Risk Assessment would be required for any development.	Ref 218
St. Peter's Rise, Bishopsworth Environment Agency: Respondent states that the designation should be revisited. A culverted water course (a designated Main River) passes through the area. The Environment Agency is unlikely to permit development on, over or within 8m of this culverted water course due to the potential flood risk management implications.	Ref 218
Church Road/Highridge Road, Bishopsworth Environment Agency: Respondent states that many sites in Whitchurch and Bishopsworth are at risk of surface water flooding and that liaising with the Lead Local Flood Authority is advised.	Ref 218
Two Mile Hill Road South Gloucestershire Council: Respondent states that the draft policy should refer to the Two Mile Hill Road centre as being part of Kingswood Town Centre. The draft policy should also refer to the close proximity of the Two Mile Hill Road centre to the other South Gloucestershire centres. This approach is helpful to both applicants and planning officers in applying the sequential test.	Ref 465
Comments in relation to the approach to the creation of new centres included in Draft Policy SSE1 National Highways: Respondent states that this element of the draft policy should include reference to the incorporation of permeable and sustainable	Ref 142

Consultee	Reference
transport networks to facilitate ease of movement across any new centres created.	

19. Draft Policy SSE2: Development in Bristol's Centres

Overview: In total, 15 respondents made 15 comments regarding Draft Policy SSE2. Key themes are identified below.

Table 36 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy SSE2: Development in Bristol's Centres</p> <p><i>Comments in support (2):</i> Two comments express general support for the draft policy. These comments support the approach of promoting the protection of active frontages within centres. Minor changes are suggested which include making reference to historic conservation and consultation with local people.</p> <p>Sustrans state that they are in support of the draft policy. This respondent suggests that there should be provision for travel without need for a car between these centres.</p> <p><i>Comments neither in support nor objection (3):</i> One respondent states that the draft policy needs to be flexible in terms of the contributions sought from developers towards environmental enhancement required at centres.</p> <p>One comment states that new public houses should not be refused permission where they fall outside of the designated centres. Another respondent states that the policy needs to reflect the need to value local centres as areas for local services.</p>	<p>183, 402 (support)</p> <p>121, 143, 169 (neither in support nor objection)</p>
<p>Comments in relation to the approach to District and Local Centres included in Draft Policy SSE2</p> <p><i>Comments neither in support nor objection (1):</i> One comment states that the decline of smaller centres is due to high rates for small business enterprises. This respondent states that local government should lobby central government for a reduction in business rates.</p>	<p>155 (neither in support nor objection)</p>
<p>Comments in relation to the approach to residential development included in Draft Policy SSE2</p> <p><i>Comments in support (2):</i> Two comments support the approach of preventing the change of use of ground floor frontages to residential development within primary shopping areas.</p> <p><i>Comments objecting (7):</i> Comments object to the draft policy given its general opposition to residential uses within the ground floor frontage of primary shopping areas. Of these comments, two comments refer to the Bristol City Centre Framework 2020. It is stated that the Framework highlights that residential can complement retail uses and also that residential uses that complement retail uses should be permitted within the primary shopping areas.</p>	<p>155, 223 (support)</p> <p>88, 165, 171, 184, 185, 193, 201 (object)</p>

20. Draft Policy SSE3: Supporting Bristol's evening and night-time economy

Overview: In total, 13 respondents made 15 comments regarding Draft Policy SSE3. Key themes are identified below.

Table 37 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy SSE3: Supporting Bristol's evening and night-time economy</p> <p><i>Comments in support (3):</i> A number of comments express general support for the draft policy. This includes support for the approach of encouraging the uses set out. One respondent suggests that planning officers should keep track of appropriate buildings for these uses and that local communities should be alerted when these types of buildings become available.</p> <p>The Bristol Business Improvement Districts – Bristol City Centre, Redcliffe & Temple and Broadmead suggests that the draft policy could also support opportunities for new late-night venues.</p> <p><i>Comments objecting (3):</i> Two respondents object to a perceived preference for the operation of late-night businesses over the health and wellbeing of residents. Another respondent suggests that there is no need for additional development in the city for hospitality, evening and night-time economy, culture and leisure uses.</p> <p><i>Comments neither in support nor objection (3):</i> One respondent queries how existing entertainment and social venues will be affected. Another respondent is concerned that the draft policy over-emphasises the commercial role of the night-time economy without reflecting its role for community life.</p> <p>Sustrans notes the importance of travelling to night-time venues without a car. This respondent highlights the safety considerations that need to be made in relation to the promoting this type of travel.</p>	<p>57, 109, 129 (support)</p> <p>13, 215, 219 (object)</p> <p>1, 169, 183 (neither in support nor objecting)</p>
<p>Comments in relation to the approach to centres being the focus for hospitality, evening and night-time economy, culture and leisure uses included in Draft Policy SSE3</p> <p><i>Comments objecting (2):</i> Two respondents object to the approach of centres being the focus for hospitality, evening and night-time economy, culture and leisure use. One of these respondents notes that local centres may often be close to residential areas and are therefore not appropriate for night-time economy uses, given the potential for noise pollution.</p>	49, 80 (object)
<p>Comments in relation to the approach to outside space for hospitality businesses included in Draft Policy SSE3</p> <p><i>Comments in support (1):</i> The Bristol Business Improvement Districts – Bristol City Centre, Redcliffe & Temple and Broadmead supports the approach of allowing for appropriate proposals for outside hospitality space, as long as pedestrian and blue badge access is maintained.</p>	57 (support)
<p>Comments in relation to the approach to the Agent of Change principle included in Draft Policy SSE3</p> <p><i>Comments in support (1):</i> Bristol Business Improvement Districts – Bristol City Centre, Redcliffe & Temple and Broadmead supports the protection of existing night-time economy venues when new residential developments are considered.</p>	<p>57 (support)</p> <p>65, 403 (neither in support nor objecting)</p>

Key Themes	Respondent Reference
<p><i>Comments neither in support nor objection (2):</i> One comment states that the entity causing change should be responsible for mitigating any ensuing issues. It is stated that this approach should apply to any new residential uses as well as to new night-time/evening uses.</p> <p>Another comment suggests alternative wording to ensure that a wider breadth of cultural venues is protected by the draft policy. The list of named uses is suggested to be expanded to include 'theatres and other performance venues'.</p>	<p>support nor objection)</p>

21. Draft Policy SSE4: Town centre first approach to development

Overview: In total, 16 respondents made 21 comments regarding Draft Policy SSE4. Key themes are identified below.

Table 38 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy SSE4: Town centre first approach to development</p> <p><i>Comments in support (3):</i> Three comments note general support for draft policy SSE4. These comments include the comment from Sustrans, who support the restriction of out-of-centre developments which might otherwise promote car dependency. Another of these comments supports the intention of the policy to limit the growth of town centre uses outside shopping areas but notes that existing policy has not stopped the spread of discount retailers outside of these locations.</p> <p><i>Comments neither in support nor objection (11):</i> Seven comments state that there should be no limits on the flexibility of Class E uses. One of these respondents and two additional respondents query how town centre uses at locations outside of the defined centres will be considered through the plan and how shopping parades that are not identified in the plan will be considered.</p> <p>One respondent notes that new housing development in these centres should not be at the expense of local entertainment/community venues.</p> <p>Another comment states that that the change of use of established public houses should not be considered more acceptable where they lie outside of designated centres.</p>	<p>155, 183, 215 (support)</p> <p>49, 80, 109, 165, 169, 171, 184, 185, 193, 201 324 (neither in support nor objection)</p>
<p>Comments in relation to the sequential approach included in Draft Policy SSE4</p> <p><i>Comments in support (1):</i> One comment is from a statutory consultee, with further detail provided in the next table in this report.</p> <p><i>Comments neither in support or objecting (4):</i> Four comments request a change to the draft policy relating to applications proposing main town centre uses that are equal to or less than the amount of floor space currently present on the site. In these situations, the sequential approach should not apply.</p>	<p>142 (support)</p> <p>165, 171, 184, 201 (neither in support nor objection)</p>
<p>Comments in relation to the approach to the primary shopping area included in Draft Policy SSE4</p> <p><i>Comments in support (1):</i> One comment is from a statutory consultee, with further detail provided in the next table in this report.</p>	<p>142 (support)</p>
<p>Comments in relation to the impact assessment thresholds included in Draft Policy SSE4</p> <p><i>Comments objecting (1):</i> One respondent states that the town centre uses should be encouraged within the Bristol Central Area as well as Bristol City Centre. The respondent states that the 500sqm impact assessment threshold is unduly restrictive in relation to development within the Bristol Central Area.</p>	<p>164 (object)</p>

Overview: In total one statutory body made comments regarding Draft Policy SSE4. Detailed comments from that statutory body were provided as follows:

Table 39 Comments from statutory bodies and partnerships

Consultee	Reference
Comments in relation to the approach to the sequential approach included in Draft Policy SSE4	
National Highways: Respondent supports the approach of maintaining the existing hierarchy of centres through a sequential approach to development where there is suitable sustainable transport capacity or where it can be provided. The positive consideration for town centre uses at other locations that are accessible by walking, cycling and public transport, is also supported.	Ref 142
Comments in relation to the approach to the primary shopping area included in Draft Policy SSE4	
National Highways: Respondent notes that the approach to primary shopping areas included in Draft Policy SSE4 aligns with the requirements of the NPPF.	Ref 142

22. Draft Policy SSE5: Temporary uses in centres

Overview: In total, 14 respondents made 14 comments regarding Draft Policy SSE5. Key themes are identified below.

Table 40 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about policy SSE5: Temporary uses in centres</p> <p><i>Comments in support (7):</i> Three comments support the general principle of Draft Policy SSE5. One comment notes the potential benefits of the approach given that it may support temporary uses, such as micropubs, which might replace a previously existing facility in an area of need.</p> <p>One respondent notes support, but requests more detail on the approach to Compulsory Rental Auction process in the city. Another respondent states that the Vacant Commercial Property Grant Scheme should be extended to make draft policy SSE5 more successful.</p> <p><i>Comments objecting (1):</i> One comment states that a blanket ban on the use of vacant sites for car parking will make town centres inaccessible for older people and those unable to walk or cycle. This respondent states that in some town centres, the use of vacant land for car parking space could be useful without undermining travel by sustainable modes.</p> <p><i>Comments neither in support nor objection (6):</i> Six comments suggest that the draft policy should be for neutral impacts on local character and amenity to be considered acceptable. This would be in contrast to the approach set out in draft policy SSE5 which requires that proposals for temporary uses enhance these aspects of a site. Some of these comments also state that paragraph 9.33 of the supporting text of the policy repeats much of paragraph 9.30.</p>	<p>57, 110, 128, 142, 169, 183, 386 (support)</p> <p>155 (object)</p> <p>165, 171, 184, 185, 193, 201 (neither in support nor objection)</p>

Overview: In total one statutory body made comments regarding Draft Policy SSE5. Detailed comments from that statutory body were provided as follows:

Table 41 Comments from statutory bodies and partnerships

Consultee	Reference
<p>General comments about Draft Policy SSE5: Temporary Uses in Centres</p> <p>National Highways: Respondent supports the approach of considering proposals for temporary car-parking on vacant sites unacceptable. It is stated that this approach will help to manage demand for city centre parking and impacts on the strategic road network. Respondent states that proposals for the temporary use of vacant buildings or sites within centres should be supported by a Transport Statement or Transport Assessment.</p>	Ref 142

23. Draft Policy SSE6: Retaining and enhancing markets

Overview: In total, four respondents made four comments regarding Draft Policy SSE6. Key themes are identified below.

Table 42 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy SSE6: Retaining and enhancing markets</p> <p><i>Comments in support (3):</i> Three comments note general support for Draft Policy SSE6. These comments also state that the draft policy will help to encourage busier trading times and enhance working incomes for small-scale food producers.</p> <p><i>Comments neither in support nor objection (1):</i> One respondent states that markets should seek to complement local businesses and take other food / beverage offers nearby into account.</p>	<p>131, 170, 292 (support)</p> <p>57 (neither in support nor objection)</p>

24. Draft Policy SSE7: Provision of public toilets

Overview: In total, 48 respondents made 48 comments regarding Draft Policy SSE7. Key themes are identified below.

Table 43 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy SSE7: Provision of public toilets</p> <p><i>Comments in support (34):</i> Ten comments are in general support of Draft Policy SSE7. A number of additional comments identify groups of people who are particularly affected by lack of access to public toilets and would thereby benefit from the policy. These groups include:</p> <ul style="list-style-type: none"> • women; • older people; • young children; • vulnerable people; and • those who cannot afford to pay to access toilet facilities. <p>A number of comments support the principle of the draft policy as a means of promoting improved public health and equality. The draft policy is also seen as means of supporting the liveability and walkability of neighbourhoods.</p> <p>A number of these respondents state that this draft policy would result in a good use of developers' money given the current lack of access to public toilets in many locations. Four respondents state that BCC has some responsibility to reopen closed facilities, create partnerships with developers, and play a greater role in the provision of these facilities as well as their maintenance. One respondent suggests that more funding should be made available to businesses in the Community Toilet Scheme.</p> <p>A number of comments suggest that facilities should be open to all 24 hours a day and should be clearly signposted in order to encourage people to use outdoor spaces more often.</p> <p>Those supporting the draft policy principles also include a number of suggestions in relation to the wording. These respondents state the draft policy needs to be more strongly worded to ensure access is not restricted by any means and that facilities are appropriately maintained.</p> <p><i>Comments objecting (2):</i> Two comments query why developers should provide public toilets and why the provision of these types of facilities is not the responsibility of BCC. It is requested that closed public toilets should be reopened and reinstated by BCC before developers are required to provide any new facilities.</p> <p><i>Comments neither in support nor objection (12):</i> Many respondents stated that certain elements of the draft policy should be clarified. It is stated that the term 'open to the public' needs to be defined and that the draft policy should be clear about who will be allowed to use new facilities.</p>	<p>29, 33, 34, 35, 42, 48, 57, 67, 71, 79, 122, 127, 128, 129, 134, 146, 169, 170, 183, 195, 202, 215, 217, 252, 288, 292, 307, 321, 343, 359, 368, 386, 444, 467 (support)</p> <p>301, 365 (object)</p> <p>49, 65, 80, 155, 162, 165, 171, 184, 185, 193, 201, 208 (neither in support nor objection)</p>

Key Themes	Respondent Reference
<p>One respondent also suggests that the draft policy should include a floorspace threshold above which toilet provision is required.</p> <p>Seven respondents suggest additional changes to the draft policy including:</p> <ul style="list-style-type: none"> • The requirement for the provision of toilet facilities should only be applicable where it is viable and deliverable and where this type of provision would not have a negative effect on amenity. • The Building Regulations requirements to provide changing facilities should not make a development unacceptable where this provision cannot be achieved due to the relatively high number of heritage assets in Bristol. • Clarification about BCC's approach to providing standalone public toilets so that there is not an overreliance on facilities provided by businesses. • Removal of any requirement for 24-hour access to facilities, given the likely staffing costs and implications relating to crime prevention strategies. <p>One of these comments suggests that a separate Section 106 obligation is considered to ensure major developments help pay for public toilets.</p> <p>One comment notes that BCC has closed a number of public toilets and sold sites which previously accommodated these types of uses in recent years, without stating support or objection to the overall draft policy approach.</p>	

Overview: In total one statutory body made comments regarding Draft Policy SSE7. Detailed comments from that statutory body were provided as follows:

Table 44 Comments from statutory bodies and partnerships

Consultee	Reference
<p>General comments about Draft Policy SSE7: Provision of public toilets</p> <p>Natural England: Respondent states that the draft policy should address the provision of public toilets in greenspaces to decrease inequalities in relation to access to these types of spaces. It is stated that BCC could explore innovative funding sources for these facilities including corporate sponsorship.</p>	Ref 208

25. Proposed approach to the preparation of local design guides or codes

Overview: In total, three respondents made three comments regarding the approach to the preparation of local design guides or codes included in the plan. Key themes are identified below.

Table 45 Summary of consultation responses to the approach of the plan

Key Themes	Respondent Reference
<p><i>Comments objecting (2):</i> One respondent objects to the approach of recognising community involvement in the drafting of local design codes while also stipulating in policy what design codes should include.</p> <p>Another respondent objects stating that the approach set out in the plan for the preparation of local design guides or codes is not in line with the Government's National Model Design Code guidance (2021).</p> <p><i>Comments neither in support nor objection (1):</i> One comment states that local design guides or codes should be informed by a stronger vision and expectations. The approach should be partly guided by contribution that retrofitting and modifying existing structures can make to achieving climate change goals.</p>	<p>80, 428 (object)</p> <p>143 (neither in support nor objection)</p>

26. Draft Policy DC A: Delivering well-designed, inclusive places

Overview: In total, 38 respondents made 65 comments regarding Draft Policy DC A. Key themes are identified below.

Table 46 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy DC A: Delivering well-designed, inclusive places</p> <p><i>Comments in support (2):</i> One respondent supports the draft policy given the role that good design plays in creating vibrant and engaged communities. Another respondent supports the principle, but notes that flexibility may need to be applied when considering proposals for student accommodation against its requirements.</p> <p><i>Comments objecting (1):</i> One respondent objects noting concerns that national guidance regarding co-design with local communities is not being followed. This respondent requests greater information on the co-design procedures to be used as part of decision making that the plan will inform.</p> <p><i>Comments neither in support nor objection (19):</i> Seven respondents state that they will wait until a more complete version of the draft policy is made available before submitting comments.</p> <p>Five respondents suggest changes, which include:</p> <ul style="list-style-type: none"> • Elements of draft policy DC B regarding advertisements in conservation areas should also be included in Draft Policy DC A. • The Healthy Streets Approach should be adopted as part of the formal assessment of street design and transport schemes. • The inclusion of a requirement for residential and mixed-use developments to support opportunities for access to 'good food'. • The inclusion of draft policy text to support the creation of new parks and green spaces. • A prevention of development on garden plots being classified as brownfield development. <p>One respondent states that the draft policy is too high level to provide the required level of guidance for new developments.</p> <p>One respondent requests information on how green spaces will be funded in the city the future.</p> <p>Another respondent states reference to the term 'beautiful' in the draft policy is subjective and therefore is not appropriate.</p> <p>One respondent states that the underlying driver of this draft policy should be the creation of cohesive, vibrant and sustainable communities.</p> <p>One respondent states that residential development should be designed to be low-rise and accommodate a range of house sizes. Residential development</p>	<p>113, 164 (support)</p> <p>18 (object)</p> <p>1, 12, 14, 57, 89, 131, 136, 155, 162, 165, 169, 171, 184, 185, 193, 200, 201, 223, 275 (neither in support nor objection)</p>

<p>should also provide for gardens and allotments, bike parking and electric vehicle charging points.</p> <p>One respondent notes that the draft policy appears to be drafted to address new development in the city, rather than redevelopment which might be required to preserve and augment an existing area. This respondent supports the creation of local design codes but is concerned about whether there will be sufficient resources for this. The respondent also supports the retention of policies DM30, DM31, DM32 and BCS22 of the adopted Core Strategy (2011) and Site Allocations and Development Management Policies document (2014).</p> <p>One respondent notes that high-quality design should be essential in any new development. Furthermore, developers should be required to undertake post-completion checks to ensure the development meets the original design specification. This respondent also states that there should be greater emphasis on the requirement for developments to support liveable and socially cohesive neighbourhoods which are attractive, safe and pedestrian friendly.</p>	
<p>Comments in relation to the criteria to create or contribute to well-designed places included in Draft Policy DC A</p> <p><i>Comments in support (3):</i> One respondent supports the draft policy approach of requiring developments to be inclusive. The assessment of whether or not a development achieves this requirement should be supported as part of Design and Access Statements submitted to support planning applications.</p> <p><i>Comments neither in support nor objection (4):</i> One respondent states that all development should consider their immediate surroundings. If these are in poor condition, then development proposals should include measures to improve the surrounding area. This respondent also states that new development should also be required to address any shortfall in terms of local amenity. Furthermore, new green spaces provided should be required to be accessible and suitable for use by early occupiers and should be delivered to be maintainable by residents.</p> <p>Another respondent requests clarity on how the term ‘inclusive’ is to be interpreted. One respondent is concerned that the approach to the safeguarding of existing development could prevent regeneration in the city.</p>	<p>142, 170, 208 (support)</p> <p>109, 163, 223, 392 (neither in support nor objection)</p>
<p>Comments in relation to the approach to ensuring consistency with the ten characteristics of well-designed places of the National Design Guide included in Draft Policy DC A</p> <p><i>Comments neither in support nor objection (2):</i> Two comments are from statutory consultees, with further detail provided in the next table in this report.</p>	<p>142, 465 (neither in support nor objection)</p>
<p>Comments in relation to the approach to urban living included in Draft Policy DC A</p> <p><i>Comments in support (1):</i> One respondent supports the draft policy. This respondent also states that in order to support the delivery of the required number of homes for the city, a change of approach is needed in relation to density optimisation and integrating new development into the existing context.</p> <p><i>Comments objecting (4):</i> The Bristol Civic Society and one other respondent object to this draft policy as they are concerned that the text implies that liveability can be compromised in order to achieve target housing numbers. These respondents request that the minimum space standards for liveability are</p>	<p>200 (support)</p> <p>49, 80, 155, 219 (object)</p> <p>75, 113, 233, 465 (neither in support nor objection)</p>

<p>included. This could address the minimum space required for communal spaces and for play spaces.</p> <p>One respondent objects to the draft policy as they are concerned that optimising densities could lead to a lowering of living standards in Bristol.</p> <p>One respondent is concerned that the reference to further design guidance in the draft policy means that there can be limited discussion about this aspect of the draft policy, and more generally, the approach to achieving good design.</p> <p><i>Comments neither in support nor objection (4):</i> Two respondents request more information regarding the public amenities which will be required to support urban living, such as health services and schools.</p> <p>One respondent states that the optimisation of densities supported in the draft policy should not result in issues relating to access to green and blue spaces.</p>	
<p>Comments in relation to the approach to mixed-use development included in Draft Policy DC A</p> <p><i>Comments in support (1):</i> One comment was received from a statutory consultee, with further detail provided in the next table in this report.</p> <p><i>Comments neither in support nor objection (5):</i> The Bristol Civic Society and one other respondent note that it can be complicated to produce a mixed-use development which secures healthy, inclusive and safe places for residents with social interaction, and that the draft policy text should recognise this.</p> <p>One respondent states that major developments should only have to provide a mix of uses where possible. This respondent states that the draft policy should clarify that any mix of uses at a site will reflect the context of the surrounding area.</p> <p>Another respondent notes that the draft policy could also refer to supporting access to health and social care as part of mixed-use development.</p> <p>One respondent requests clarity about how an appropriate mix of uses should be established for a site.</p>	<p>465 (support)</p> <p>49, 80, 100, 113, 121 (neither in support nor objection)</p>
<p>Comments in relation to the approach to local character and distinctiveness included in Draft Policy DC A</p> <p><i>Comments in support (1):</i> One comment is from a statutory consultee, with further detail provided in the next table in this report.</p> <p><i>Comments neither in support nor objection (3):</i> One respondent notes that a development may cause some harm to local character or existing amenity, but may still be considered acceptable in planning terms when considering its total merits. This respondent suggests that the draft policy should be written to reflect this.</p> <p>Another respondent suggests that the draft policy should be written so that the emphasis is on the requirement for developments to mitigate harm, rather than not granting permission for development that results in harm.</p>	<p>465 (support)</p> <p>121, 155, 185 (neither in support nor objection)</p>

One respondent is concerned that this draft policy is subjective. This respondent queries who will decide whether a development is appropriate in terms of local character and distinctiveness.	
<p>Comments in relation to the approach to co-ordinated development included in Draft Policy DC A</p> <p><i>Comments in support (1):</i> One comment is from a statutory consultee, with further detail provided in the next table in this report.</p> <p><i>Comments objecting (1):</i> One respondent states that it is unreasonable for developers to rely on third party land to bring forward their own scheme. This respondent suggests that the draft policy should be written to clarify that where there is no reasonable potential for a coordinated approach to development or where such an approach would result in delays, deliverable sites should be brought forward without the need for a coordinated approach.</p>	<p>465 (support)</p> <p>100 (object)</p>
<p>Comments in relation to the approach to public art and cultural activity included in Draft Policy DC A</p> <p><i>Comments neither in support nor objection (5):</i> One respondent states that it may not always be possible or appropriate for new development to enable the delivery of public art or other cultural activity. Therefore, the draft policy should be written to allow for greater flexibility in relation to this requirement.</p> <p>Two respondents request greater clarity in relation to a developer's role in delivering public art. One respondent states that the draft policy approach could be to seek contributions from major developments to deliver public art, but questions whether this needs its own draft policy sub-heading.</p>	<p>109, 113, 121, 185, 465 (neither in support nor objection)</p>
<p>Comments in relation to the approach to further design guidance included in Draft Policy DC A</p> <p><i>Comments neither in support nor objection (1):</i> One comment is from a statutory consultee, with further detail provided in the next table in this report.</p>	<p>465</p>
<p>Comments about Appendix 3 relating to Draft Policy DC A</p> <p><i>Comments in support (2):</i> Two comments are from statutory consultees with further detail provided in the next table in this report.</p> <p><i>Comments neither in support nor objection (5):</i> One respondent states that low carbon design should be treated as an essential component of good design.</p> <p>One respondent states that high-rise buildings should not be built in Bristol as they are not sustainable, liveable or beautiful. This respondent also notes that costly fire safety requirements associated with high-rise buildings can lead to lower levels of affordable housing.</p> <p>Another respondent states that local design guidance should address the character and function of parks and green spaces. They also suggest that local design guidance relating to nature should refer to the ecological emergency as well as the benefits of green space to people and wildlife. The guidance should also link to targets of the One City Plan (2021).</p> <p>One respondent is concerned that the proposals included in the appendix are too aspirational and will not be realised. This respondent also notes the need for different approaches to design in urban and suburban environments.</p>	<p>157, 465 (support)</p> <p>49, 136, 155, 223, 291 (neither in support nor objection)</p>

Another respondent advocates the use of lower quality green spaces for permeable hard standing parking spaces in Lawrence Weston. This is part of an approach to address parking demands and provide better quality open spaces overall.	
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Overview: In total six statutory bodies and partnerships made comments regarding Draft Policy DC A. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 47 Comments from statutory bodies and partnerships

Consultee	Reference
General comments about Draft Policy DC A: Delivering well-designed, inclusive places	
Sport England: Respondent suggests that the draft policy is cross-referenced to Sport England's active design guidance. It is also suggested that active design should be required for all developments and meeting criteria relating to this might be evidenced through the use of Sport England's active design developer's checklist.	Ref 89
Comments in relation to the criteria to create or contribute to well-designed places included in Draft Policy DC A	
National Highways: Respondent is supportive of the focus on safety, sustainability and inclusive access.	Ref 142
National Grid: Respondent suggests edits to the draft policy so that the criteria are presented in the context of taking a comprehensive and coordinated approach to development including respecting existing site constraints. The approach of respecting site constraints should incorporate utilities situated within sites.	Ref 163
Natural England: Respondent supports the approach of the draft policy to require well-designed, high-quality development and the creation of inclusive places that are accessible to all. Respondent suggests that the approach to inclusivity and accessibility should include green infrastructure which is designed to be safe and accessible to all.	Ref 208
Comments in relation to the approach to ensuring consistency with the ten characteristics of well-designed places of the National Design Guide included in Draft Policy DC A	
National Highways: Respondent queries how the principle 'accessible and easy to move around' will be enforced and monitored in new developments.	Ref 142
South Gloucestershire Council: Respondent notes that the headings of the National Design Guide have not been used to structure the draft policy text. It is also stated that applicants may use the National Design Guide to frame how they respond in their design statement, but that the design of developments may not actually meet the requirements. Respondent supports the draft policy approach of requiring that Design and Access Statements to demonstrate how the development responds to national design policies and guidance.	Ref 465
Comments in relation to the approach to urban living included in Draft Policy DC A	
South Gloucestershire Council: Respondent states that the draft policy makes it clear that development will be expected to optimise densities. It is stated that the draft policy could be strengthened by including 'should' or 'must' in relation to this approach. It is also suggested that a cross reference might be included to the Urban Living SPD (2018).	Ref 465
Comments in relation to the approach to mixed-use development included in Draft Policy DC A South Gloucestershire Council: Respondent supports the requirement of the draft policy for proposals to contribute to an appropriate mix of uses.	Ref 465

Consultee	Reference
Comments in relation to the approach to local character and distinctiveness included in Draft Policy DC A	
South Gloucestershire Council: Respondent supports the approach to not permit development that fails to take the opportunities available to improve the character and quality of the area and the way it functions.	Ref 465
Comments in relation to the approach to co-ordinated development included in Draft Policy DC A	
South Gloucestershire Council: Respondent supports the approach of the draft policy in relation to achieving co-ordinated development.	Ref 465
Comments in relation to the approach to public art and cultural activity included in Draft Policy DC A	
South Gloucestershire Council: Respondent states that wording for the public art and cultural activity paragraph could be strengthened given that it presently only states that that new development 'should enable' the delivery of permanent and temporary public art.	Ref 465
Comments in relation to the approach to further design guidance included in Draft Policy DC A	
South Gloucestershire Council: Respondent states that the reference to design codes is very brief and could be expanded.	Ref 465
Comments about Appendix 3 relating to Draft Policy DC A	
Historic England: Respondent supports the inclusion of Appendix 3 because of the plan's commitment to design that positively responds to local historic character and distinctiveness. The approach of preparing a suite of design codes, masterplans and spatial frameworks is also supported. The reference in the plan to the West of England's Placemaking Charter is also supported.	Ref 157
South Gloucestershire Council: Respondent supports the inclusion of specific reference to the need to produce local design guides or codes and the themes that the design guidance will cover. It is suggested that a comprehensive design SPD could be included to address design codes for BCC.	Ref 465

27. Draft Policy DC B: Advertisements

Overview: In total, 49 respondents made 66 comments regarding Draft Policy DC B. Key themes are identified below.

Table 48 Summary of consultation responses to elements of the draft policy

Key Themes	Respondent Reference
<p>General comments about Draft Policy DC B: Advertisements</p> <p><i>Comments in support (14):</i> Eleven respondents note general support for the draft policy. One respondent supports the draft policy as a means of opposing new advertisement hoardings.</p> <p>One further respondent notes support for the draft policy and suggests the approach should be aligned with the other policies in terms of limiting the energy demands of advertisements.</p> <p><i>Comments objecting (1):</i> One respondent objects to the draft policy as it should be made clear that the approach only applies to proposals for new advertisements. The respondent states that existing advertisements which benefit from deemed or express consent are to be a material consideration in the determination of applications. Furthermore, any conditions attached to planning permissions should accord with the advice contained in the Institution of Lighting Professionals (ILP) Guidance: The Brightness of Illuminated Advertisements PLG (Professional Lighting Guide) 05.</p> <p><i>Comments neither in support nor objection (19):</i> Adblock Bristol supports a dedicated policy on advertisements but suggest a number of changes. They state that the draft policy should require that the cumulative impacts of advertisements is considered as part of the assessing of applications. This respondent also states that the draft policy should include a cross reference to the aims of policies NZC1, BG2 and DC A, to ensure that these policies are aligned. Three respondents also state that the advertisement policy should link to other policies in the plan, such as the policies that address climate change, biodiversity and design.</p> <p>One respondent notes that advertisement may present public safety issues in relation to data protection and surveillance. This respondent also states that discontinuance notices should be served to advertisement sites once express consent has expired, so that there is more local control over advertisements.</p> <p>Four respondents note the potential for advertisements to affect a population's mental and physical health, through their content and any illumination required.</p> <p>Nine respondents note the high energy usage and detrimental impact of Illuminated advertisements in relation to achieving net zero carbons. Many of these respondents suggest an approach that would place a restriction on the operating hours of advertisements, with some suggesting that preventing advertisements would result in contributions to the city's carbon emissions.</p> <p>One respondent requests clarity about how this draft policy would affect the Bristol Local Plan Review Draft Policies and Development Allocations Consultation</p>	<p>34, 35, 42, 66, 67, 71, 94, 115, 134, 146, 157, 170, 210, 446 (support)</p> <p>97 (object)</p> <p>2, 81, 83, 113, 125, 131, 137, 158, 204, 220, 222, 229, 230, 272, 343, 356, 359, 364, 370 (neither in support nor objection)</p>

(2019) which proposed to retain policy DM29 of the Site Allocations and Development Management Policies document (2014) 'with minimal updating'.	
<p>Comments in relation to the criteria relating to advertisements having an unacceptable impact on amenity included in Draft Policy DC B</p> <p><i>Comments in support (11):</i> One respondent notes general support for approach to addressing unacceptable impacts on amenity. This respondent also states that bus stop advertisements should be removed to make these locations more welcoming.</p> <p>Four respondents also note their support for the draft policy. Particular support is noted for the approach that lower levels of existing visual amenity in a given area will not be used as a benchmark to determine proposals that could have adverse impacts on aesthetic quality. One of these respondents supports an approach that would limit the operating hours and levels of luminance at advertisements, and would like this approach to also be applied for shop front fascia boards. This respondent queries whether BCC could consider advice from typographers on appropriate styles, fonts and colours for advertisements.</p> <p>One respondent supports new definitions relating to amenity included in the draft policy. However, they would like clarity about whether hours of illumination for advertisement will be restricted.</p> <p>One respondent supports the approach protecting the aesthetic quality public spaces.</p> <p>Two respondents support the draft policy stating that lighting from advertisements can have amenity impacts on wildlife and people.</p> <p>One respondent supports the draft policy given that it recognises the potential harm of digital advertisements in relation to amenity.</p> <p>One respondent supports the draft policy as advertising units and telephone boxes detract from the quality of the city centre and can generate noise and light pollution. This respondent also states that advertisements for out of centre shopping locations can undermining the viability of the town centre.</p> <p><i>Comments objecting (1):</i> One respondent queries the evidence base that supports the draft policy. This respondent also states that the draft policy does not adequately define incongruous features or what can be counted as nuisances. The respondent states that the draft policy should only refer to the potential for adverse effects where advertisements are not an established feature or if an area is wholly residential in character. It should not refer to impacts on medium to long-distance views, as the context of locations where advertisements are proposed may mean that they can be considered acceptable.</p> <p><i>Comments neither in support nor objection (7):</i> Adblock Bristol suggests a number of additional criteria that should be considered as part of the policy. The changes suggested include: having regard to visual amenity in any area of the city; the enjoyment of green space; the potential for intrusive light; impacts relating to ease of movement; and the creation of well-designed, inclusive places.</p>	<p>48, 57, 79, 84, 122, 155, 158, 272, 317, 342, 364 (support)</p> <p>97 (object)</p> <p>75, 80, 115, 137, 204, 220, 229 (neither in support nor objection)</p>

<p>One respondent notes that any site with advertising hoarding will detract from local character, contribute to visual distraction and impact on residents' living conditions.</p> <p>One respondent states that no area should have any more advertisement spaces, as the respondent feels these spaces are damaging to amenity.</p> <p>Another respondent notes that the potential for impacts on amenity should include anti-social behaviour which can often be associated with areas that contain advertisements.</p> <p>Three respondents suggest that light pollution should also be an unacceptable impact.</p>	
<p>Comments in relation to the criteria relating to advertisements having harmful impacts on public and road safety included in Draft Policy DC B</p> <p><i>Comments in support (8):</i> Six respondents support the policy given its likely to result in benefits in relation to improved road safety.</p> <p>One additional respondent also notes support for the draft policy's approach to defining public amenity and road safety.</p> <p><i>Comments objecting (1):</i> One respondent states that the text relating to harm to public safety where advertisements obscure views into an area should be updated to refer only to areas that are publicly accessible, and that there should be no restrictions on lawful advertisements which restrict views into private property.</p> <p><i>Comments neither in support nor objection (4):</i> Adblock Bristol suggests that the draft policy should require advertisement to have regard to the safety of cyclists and to limit the potential for visual distractions in relation to the interpretation of road signs. Similarly, another respondent states that the definition of 'unacceptable impact on public safety' should also include visual distractions relating to cyclists, pedestrians and wheelchair users. Adblock Bristol also suggests that the draft policy should include an additional criterion relating to advertisements that might encroach on personal privacy. The respondent also suggests that the policy should provide clarity about how advertisements that create an unwelcoming sense of enclosure will be assessed.</p> <p>One respondent suggests that the draft policy should also prevent advertisements which create barriers in pedestrian areas.</p> <p>One respondent states that illuminated digital screens create harmful impacts and risk public safety for all road users.</p>	<p>33, 79, 142, 158, 272, 356, 358, 368 (support)</p> <p>2 (object)</p> <p>74, 204, 229, 392 (neither in support nor objection)</p>

Overview: In total two statutory bodies and partnerships made comments regarding Draft Policy DC B. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 49 Comments from statutory bodies and partnerships

Consultee	Reference
<p>General comments about Draft Policy DC B: Advertisements</p> <p>Historic England: Respondent supports the reference in the explanatory text of the draft policy to the requirement for developments in Conservation Areas to</p>	Ref 157

Consultee	Reference
meet the criteria of Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990. It is stated that this consideration may also be relevant to other sections of the plan given that around a third of the city is covered by Conservation Areas.	
<p>Comments in relation to the criteria relating to having harmful impacts on public and road safety included in Draft Policy DC B</p> <p>National Highways: Comment in support of criteria included in the draft policy in relation to advertisements having harmful impacts on public and road safety. Respondent notes that advertisements are a potential hazard to users of the strategic road network when sited inappropriately.</p>	Ref 142

28. Development locations and allocations: development locations and allocations that are not specific to an individual site

Overview: In total, 15 respondents made 15 comments regarding the development locations and allocations that are not specific to an individual site. Key themes are identified below.

It should be noted that comments received in relation to the specific development locations and allocations included in the Draft Policies and Development Allocations (2022), are summarised in tables later in this report.

Table 50 Summary of consultation responses to proposed development locations and allocations

Key Themes	Respondent Reference
<p><i>Comments objecting (8):</i> Eight respondents object to the approach to development locations and allocations in the Draft Policies and Development Allocations document (2022) without referring to a specific site. The reasons stated for these objections include:</p> <ul style="list-style-type: none"> • Brownfield land should be developed before greenfield land, with the potential for negative impacts on wildlife resulting from the development of greenfield highlighted. • The need for development to be considered in the context of pressures on existing services. In the past development has not always supported the delivery of new services. • Green spaces should not be developed as they are a valuable resource for local people. • BCC has previously declared a climate and ecological emergency, and has stated that it will not allow development within the Green Belt. Development of sites within the Green Belt would be contrary to these declarations. <p>One of the respondents objecting states that the plan should be clear that only sites which are compliant with the current version of the NPPF and the Environment Act 2021 should be retained for allocation. Furthermore, site allocations that encroach on SNCIs and are not subject to a pending planning application or have yet to be developed, will not be allocated. This respondent also states that the approach of prioritising the development of brownfield land will need to consider the NPPF and the Town and Country Planning Act definitions of that type of land. These sites should be listed on BCC's up-to-date brownfield register.</p> <p><i>Comments neither in support nor objection (7):</i> One respondent notes the challenges of protecting green spaces whilst also providing new homes. This respondent also notes the benefits of green spaces in terms of health and wellbeing.</p> <p>One respondent requests that the policy clarifies how BCC's Golden Motion to protect the city's green spaces has influenced the selection of the development locations and allocations.</p>	<p>130, 278, 323, 339, 372, 385, 408, 456 (object)</p> <p>90, 113, 136, 142, 218, 228, 465 (neither in support nor objection)</p>

Overview: In total five statutory bodies and partnerships made general non-site-specific comments on the development locations and allocations. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 51 Comments from statutory bodies and partnerships

Consultee	Reference
The Coal Authority: Respondent expects that sites proposed as development allocations will be assessed against the downloadable data provided by the Coal Authority, in respect of Surface Coal and Development Risk.	Ref 90
National Highways: Respondent states that the number of proposed dwellings to be allocated on a site basis should be detailed so that more substantive comments can be provided.	Ref 142
Environment Agency: Respondent states that a sequential approach to development should be taken in cooperation with BCC's neighbouring authorities. Development on previously developed land should be prioritised. It is stated that this approach will help to reduce the risk of flooding. Land at risk of flooding should be used for green infrastructure, nature recovery networks, natural flood management, green space and flood storage, etc. The Environment Agency would object to a plan that allocates development in Flood Zones 2 or 3, where there are sites at lower flood risk that are reasonably available for development.	Ref 218
Bath and North East Somerset Council: Respondent suggests that continuing dialogue is needed between Bath and North East Somerset Council and BCC regarding the assessment of transport and other infrastructure impacts of any development allocations proposed for inclusion in the Regulation 19 plan. The assessment should consider any proposed mitigation measures.	Ref 228
South Gloucestershire Council: Respondent notes that the plan indicates that the Green Belt sites being taken forward in the plan can deliver between 1,150 to 1,400 new homes. It is stated that it may be helpful to show what method has been applied to arrive at these figures.	Ref 465

29. Development locations and allocations: Land at Bath Road, Brislington

Overview: In total, 57 respondents made 63 comments regarding the proposed allocation at Bath Road, Brislington. Key themes are identified below.

Table 52 Summary of consultation responses to elements of the proposed allocation

Key Themes	Respondent Reference
<p>General comments about the proposed allocation of Land at Bath Road, Brislington</p> <p><i>Comments in support (2):</i> Wyevale (Bristol) Ltd supports the allocation of the site for development. This respondent owns part of the site and notes that it is immediately available for development and is partly previously developed land. It is stated that the capacity of the site could be increased given the removal of other proposed allocations from the Draft Policies and Development Allocations document (2022).</p> <p>Bellway Homes is a potential developer of the site. This respondent supports the allocation of the site stating that Bristol's housing need provides the exceptional circumstances needed to support the release of the land from the Green Belt. The respondent notes that their portion of the site would deliver up to 555 homes, enable transport improvements and is in a sustainable location. The development of the site would also allow for the establishment of a new long-term Green Belt boundary.</p> <p><i>Comments objecting (43):</i> The following reasons are given for objecting to the allocation of Land at Bath Road:</p> <ul style="list-style-type: none"> • There are no exceptional circumstances for the release of land from the Green Belt, and its presence within this policy designation acts to prevent urban sprawl and provide mitigation against the effects of climate change. • The site is of ecological value and contains important green infrastructure features. • The site is of importance for mitigating flood risk. • Brownfield land should be developed before greenfield land. • Development would place pressure on existing amenities and services. • Development would result in increased pollution, congestion, and associated risks to road safety. • Concerns that there has already been development and removal of greenery in the area. <p><i>Comments neither in support nor objection (7):</i> One respondent requests clarification about the potential to relocate the existing park and ride facility, if this land is developed for other uses.</p> <p>One respondent states that any proposed development that comes forward for the site should be designed as a liveable neighbourhood, with a mix of uses. The development should provide access to amenities within a 15-minute walk and should incorporate public transport and active travel routes which meet the requirements of local policies. One respondent notes a perceived conflict between the potential sustainability of the site due to its transport connections and the relocation of the park and ride.</p>	<p>160, 190 (support)</p> <p>6, 27, 32, 33, 34, 35, 41, 42, 44, 45, 48, 66, 67, 71, 74, 79, 82, 118, 122, 130, 134, 144, 146, 154, 172, 202, 211, 216, 217, 224, 226, 275, 276, 280, 292, 314, 319, 325, 331, 362, 363, 368, 376 (object)</p> <p>49, 80, 89, 183, 218, 228, 465 (neither in support nor objection)</p>

<p>Comments in relation to the key development principles included for the proposed allocation at the Land at Bath Road, Brislington</p> <p><i>Comments in support (1):</i> One comment was received from a statutory consultee, with further detail provided in the next table in this report.</p> <p><i>Comments objecting (2):</i> One respondent notes that the key development principle of retaining all trees, hedgerows and green infrastructure at the site is unlikely to be achievable. It is stated that this approach would result in not enough space being available for development.</p> <p>One respondent states that the high level of affordable housing required to be provided at the site, does not justify its release from the Green Belt.</p> <p><i>Comments neither in support nor objection (3):</i> One respondent requests further information about the affordable housing requirements for the site.</p> <p>Another respondent states that the level of 40% affordable housing set out in the key development principles for the site, should be guaranteed.</p>	<p>465 (support)</p> <p>130, 219 (object)</p> <p>41, 190, 208 (neither in support nor objection)</p>
<p>Comments in relation to the approach to proposals adjacent to Bristol included in relation to the proposed allocation at the Land at Bath Road, Brislington</p> <p><i>Comments in support (3):</i> Crest Nicholson, the developer of the Hicks Gate site, an adjacent site within Bath and North East Somerset, supports BCC's recognition of development opportunities adjacent to Land at Bath Road. The respondent notes that the benefits of Land at Bath Road set out in the Draft Policies and Development Allocations document (2019) would also apply to their site.</p> <p>Another respondent supports the allocation but suggests that the boundary should be changed so that land to the north of Bath Road is also incorporated, including Brislington Cricket Club. This respondent states that development in this area could help ensure the future of the cricket club at the site and provide additional housing, including specialist homes.</p> <p><i>Comments neither in support nor objection (2):</i> Two comments are from a statutory consultee, with further detail provided in the next table in this report.</p>	<p>139, 152, 465 (support)</p> <p>228, 463 (neither in support nor objection)</p>

Overview: In total six statutory bodies and partnerships made comments on the proposed allocation of Land at Bath Road, Brislington. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 53 Comments from statutory bodies and partnerships

Consultee	Reference
General comments about the proposed allocation of Land at Bath Road, Brislington	
Sport England: Respondent states that any development should provide new or enhanced sport and recreation facilities whilst also having a positive impact on the public's health and mental wellbeing.	Ref 89
Environment Agency: Respondent states that detailed flood modelling is likely to be required for the site given its relationship to Scotland Bottom Watercourse. This work is likely to be needed to demonstrate the deliverability of the site and inform appropriate flood risk mitigation measures.	Ref 218
Bath and North East Somerset Council: Respondent states that the potential for development in the surrounding location on Green Belt land within Bath and North East Somerset will need to be considered as a reasonable alternative to the	Ref 228

Consultee	Reference
Bath Road site. Cross working between the authorities will be needed to assess this potential. Respondent also states that further clarity is needed as to whether BCC is proposing to relocate the park and ride site into the Bath and North East Somerset area as part of the development of the Bath Road site. Moving the park and ride facility to such a location would involve the development of Green Belt land for which exceptional circumstances would need to be demonstrated. Furthermore, additional assessment is needed to understand the likely significant transport benefits of moving the park and ride and the respondent would welcome BCC's support in pursuing this.	
South Gloucestershire Council: Respondent states that it may be helpful to consider whether an alternative location for the development can be identified in Bristol for the next stage of the Plan. This would give assurance that if it is not possible to relocate the park and ride within the site, the 250 homes considered for the current location of the park and ride can be delivered elsewhere.	Ref 465
Comments in relation to the key development principles for the proposed allocation of Land at Bath Road, Brislington	
Natural England: Respondent states that features of ecological value on this site should be retained and enhanced by new development. The proposal also provides an opportunity to provide high quality accessible green infrastructure to increase accessible greenspace available for surrounding communities which is of particular relevant given the under-provision in nearby residential areas.	Ref 208
South Gloucestershire Council: Respondent states that the development principles included are helpful to allow for an understanding of what the starting point for the allocation text (including affordable housing requirements) might look like. The principles also set out the key issues that may influence the ability for the site to be delivered in the plan period. They also set out issues that may influence the housing capacity for the site.	Ref 465
Comments in relation to the approach to proposals adjacent to Bristol included in relation to proposed allocation of Land at Bath Road, Brislington	
Bath and North East Somerset Council: Respondent states that the approach to this site should be supported by transport assessments to consider the impact of the proposed development on the highway network both within the city and within Bath and North East Somerset given the roads' importance for both areas.	Ref 228
North Somerset Council: Respondent states that the approach set out should make reference to other allocations as well as urban extensions. Development that could come forward on land close to the proposed location at Bath Road, Brislington and other locations close to Bristol will include allocations other than urban extensions.	Ref 463
South Gloucestershire Council: Respondent supports the importance placed on working with neighbouring authorities to assess the impact of allocations or other development at the edge of the authorities' boundaries. The respondent states that no decisions have been made by South Gloucestershire Council about whether Green Belt land will be released to help meet future housing needs.	Ref 465

30. Development locations and allocations: Land west of Silbury Road, Ashton Vale

Overview: In total, 83 respondents made 83 comments regarding the proposed allocation of Land west of Silbury Road, Ashton Vale. Key themes are identified below.

Table 54 Summary of consultation responses to elements of the proposed allocation

Key Themes	Respondent Reference
<p><i>Comments in support (1):</i> Esteban Investment Ltd is the prospective developer of the site and supports the proposed site allocation but requests changes to the policy text as follows:</p> <ul style="list-style-type: none"> • The planning application for the site should be referred to as 'Longmoor' not 'Longmoor Village. • The exceptional circumstances for the removal of the site from the Green Belt should be outlined. • The scale of development supported should be clearly stated. • The scheme's expected contribution to community and commercial space should be set out. 	<p>168 (support)</p> <p>21, 22, 26, 27, 29, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 48, 64, 66, 67, 74, 79, 82, 101, 106, 112, 118, 122, 130, 134, 136, 144, 146, 154, 172, 176, 186, 192, 195, 202, 211, 216, 217, 219, 224, 233, 275, 279, 280, 283, 285, 287, 288, 289, 292, 294, 295, 297, 299, 302, 316, 318, 362, 363, 367, 368, 376, 391, 396, 409, 430, 453 (object)</p>
<p><i>Comments objecting (75):</i> Five comments note general objection to the proposed allocation of Land west of Silbury Road, Ashton Vale. The remaining comments note more specific reasons for their objection, including:</p> <ul style="list-style-type: none"> • The site is a wildlife corridor and there is also potential for development to impacts upon wider ecological networks including impacts on Longmoor and Collier's Brooks. • The site provides residents with access to nature with benefits for health and wellbeing. • The site should be declared a nature reserve to be looked after by local people. • The site is located within the flood plain. • The site is within the Green Belt and there are no exceptional circumstances to justify its removal from this designation. • Development of the site would contradict BCC's September 2021 Golden Motion to protect the Green Belt and green spaces. • Development of the site would increase pressure on local services. • Noise pollution from the nearby recycling plant would affect new residents at this location. • The site is located on a former landfill site with potential for new residents to be adversely affected for this previous use. • Development of the site will potentially impact the reopening of Portishead trainline. 	<p>89, 148, 183, 199, 457, 463, 465 (neither in support nor objection)</p>
<p><i>Comments neither in support nor objection (7):</i> A number of comments recognise the need for the proposed allocation at Silbury Road, without noting express support for the allocation.</p> <p>One respondent requests that any allocation text that would guide the development of the site should include requirements for:</p> <ul style="list-style-type: none"> • an appropriate mix of uses; • provision of amenities within 15 minute walk; and • high quality walking and cycling infrastructure. 	

Several other respondents state that the allocation should be removed from the plan if the application for the development of the site is rejected by Secretary of State.	
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Overview: In total four statutory bodies and partnerships made comments regarding the proposed allocation of Land west of Silbury Road, Ashton Vale. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 55 Comments from statutory bodies and partnerships

Consultee	Reference
Sport England: Respondent states that any development at the proposed allocation should provide new or enhanced sport and recreation facilities whilst having a positive impact on the public's health and mental wellbeing.	Ref 89
Wessex Water: Respondent states that any development at proposed allocation should not include buildings or sewers within 6m of the existing sewer that runs across the site. The cumulative impact of development in this area will be reviewed by Wessex Water and any sewer improvements necessary to maintain existing levels of service will be carried out.	Ref 148
North Somerset Council: Respondent notes the change to the boundary of the Green Belt given planning permission granted for the site by BCC ² . Respondent does not indicate any support for or objection to this change.	Ref 463
South Gloucestershire Council: Respondent queries whether the allocation will reflect the number of homes (510) included in the current planning application for the site.	Ref 465

² Please note that at the time of writing, while BCC has resolved to grant outline planning permission for the site (application reference 21/03166/P) this is yet to be granted.

31. Development locations and allocations: Land adjacent to Elsbert Drive, Bishopworth

Overview: In total, 63 respondents made 69 comments regarding the proposed allocation of Land adjacent to Elsbert Drive, Bishopworth. Key themes are identified below.

Table 56 Summary of consultation responses to elements of the proposed allocation

Key Themes	Respondent Reference
<p>General comments about the allocation of Land adjacent to Elsbert Drive, Bishopworth</p> <p><i>Comments in support (1):</i> Taylor Wimpey, the prospective developer of the site, supports the proposed allocation of the site. The respondent states that they are in support of the optimisation of all deliverable and developable sites.</p> <p><i>Comments objecting (53):</i> The following reasons were given for objecting to the proposed allocation of Land adjacent to Elsbert Drive, Bishopworth:</p> <ul style="list-style-type: none"> • Development in this location would lead to an increase in pollution and congestion, and associated risks to road safety. Access to the site is unsuitable for an increased number of vehicles. • The site has poor public transport connections. • Development of the site would result in increased pressures on existing services and infrastructure. • Development in this location would lead to an increase in noise pollution for existing residents. • Development in this location would lead to overshadowing, overwhelming, and a loss of privacy for existing residents. • The development of brownfield land should be prioritised over the development of greenfield land. • The site is valued by local residents, in particular for providing green space and benefits for mental and physical health. The area already experiences some degree of deprivation and has few existing green spaces. • The site is biodiverse and supports ecological networks and habitats. • The site helps to mitigate against climate change. BCC has declared an ecological emergency with aims to increase the amount of wildlife, protected areas, tree cover and food production in Bristol. • Building more homes is likely to result in adverse effects on the environment given the need for increased use of materials, the running costs of the homes, and carbon footprint of the new residents. • The site lies within the floodplain and there are redundant coal mines in the area. • Development in this location would lead to deforestation and soil erosion, and would impact the water table. • There are no exceptional circumstances allowing for release of the site from the Green Belt which presently acts to prevent urban sprawl. • The site is not large enough to provide a significant amount of affordable housing. • High-density development should only occur in established neighbourhoods. • The site is no longer appropriate for allocation given that North Somerset Council is no longer allocating land adjacent to the site. <p><i>Comments neither in support nor objection (6):</i> Six comments are from statutory consultees, with further detail provided in the next table in this report.</p>	<p>162 (support)</p> <p>16, 19, 20, 23, 24, 27, 29, 32, 33, 34, 41, 42, 44, 45, 48, 63, 66, 67, 71, 74, 79, 82, 85, 86, 95, 96, 118, 122, 124, 130, 134, 144, 154, 172, 176, 192, 195, 202, 211, 212, 216, 217, 219, 224, 277, 280, 285, 292, 298, 362, 363, 368, 376, 461 (object)</p> <p>89, 148, 208, 218, 463, 465 (neither in support nor objection)</p>

<p>Comment in relation to the housing numbers for the proposed allocation of Land adjacent to Elsbert Drive, Bishopworth</p> <p><i>Comments in support (1):</i> Taylor Wimpey, the prospective developer of the site, supports the inclusion of the housing numbers in relation to the proposed allocation of Land adjacent to Elsbert Drive, Bishopworth. This respondent states that the site could support the delivery of 150 dwellings.</p> <p><i>Comments objecting (1):</i> One respondent states that the housing numbers set out for the site are too high.</p> <p><i>Comments neither in support nor objection (1):</i> One comments is from a statutory consultee, with further detail provided in the next table in this report.</p>	<p>162 (support)</p> <p>16 (object)</p> <p>228, (neither in support nor objection)</p>
<p>Comment in relation to the key development principles for the proposed allocation of Land adjacent to Elsbert Drive, Bishopworth</p> <p><i>Comments objecting (1):</i> One respondent states that the key development principles need to be considerably strengthened if the site is to be allocated. The respondent makes specific reference to the level of affordable housing required for the site.</p> <p><i>Comments neither in support nor objection (4):</i> Taylor Wimpey, the prospective developer of the site, provide a number of suggestions in relation to the key development principles set out for the proposed allocation of Land adjacent to Elsbert Drive, Bishopworth. These include:</p> <ul style="list-style-type: none"> • A request for clarification on the process and approval requirements for the cross-boundary masterplan for the site. • A suggestion that the retention and incorporation of new trees, hedgerows and green infrastructure should not be an absolute requirement, given that some loss will be necessary to facilitate development, and this would likely be acceptable with appropriate mitigation. • A suggestion that the biodiversity net gain requirement does not need to be included in any allocation text given that this requirement is set out through national policy and Draft Policies and Development Allocations document (2022) Draft Policy BG3. • No objection is made to providing essential infrastructure at the site but the respondent states that this should be determined through the planning application process, and indicates that the principal and only vehicle access would be from Elsbert Drive. • No objection is made to the affordable housing provision, but it is stated that this should be supported by viability testing for the site which is not yet available. • The requirement for community led/self-build housing is objected to given the likely challenges relating to delivery and the desirability of this typology on larger development allocations. <p>One respondent suggests that any proposed allocation text related to the site should require development to meet all of the key development principles.</p> <p>Another respondent requests that any emerging allocation text include an emphasis on biodiversity net gain.</p>	<p>219 (object)</p> <p>130, 136, 162, 463 (neither in support nor objection)</p>

Overview: In total seven statutory bodies and partnerships made comments on the proposed allocation of Land adjacent to Elsbert Drive, Bishopsworth. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 57 Comments from statutory bodies and partnerships

Consultee	Reference
General comments about the proposed allocation of Land adjacent to Elsbert Drive, Bishopworth	
Sport England: Respondent states that any development should provide new or enhanced sport and recreation facilities whilst having a positive impact on the public's health and mental wellbeing.	Ref 89
Wessex Water: Respondent states that the proposed allocation is likely to connect to the existing public foul sewer at Sandburrows Road, with conveyance to this sewer likely to be complex. Early engagement with the developer is recommended.	Ref 148
Natural England: Respondent states that the HRA for the plan will need to assess the potential impact of the site on the North Somerset and Mendip Bats SAC.	Ref 208
Environment Agency: Respondent refers to the published Strategic Flood Risk Assessment Level 1 which identifies a history of surface water flooding in this area of Bristol. The Environment Agency advises that consultation is needed with the Lead Local Flood Authority for further advice with regard to any proposal for the site.	Ref 218
North Somerset Council: Respondent notes that the exceptional circumstances set out for releasing land from the Green Belt across the administrative boundary, will need to be consistent between the two authorities.	Ref 463
South Gloucestershire Council: Respondent queries the number of homes that the site would provide by itself, as the Draft Policies and Development Allocations document (2022) only provides the number of homes for the proposed allocation in combination with land in North Somerset.	Ref 465
Comment in relation to the housing numbers for the proposed allocation of Land adjacent to Elsbert Drive, Bishopworth	
Bath and North East Somerset Council: Respondent notes that the proposed allocation has potential to contribute to the accommodation of around 350 homes.	Ref 228
Comment in relation to the key development principles for Land adjacent to Elsbert Drive, Bishopworth North Somerset: Respondent states that the key development principles should include reference to vehicular access to the development not being appropriate from the South Bristol Link. The affordable housing figure for the site will need to be considered in relation to potential differing requirements in Bristol and North Somerset. Furthermore, master-planning for the site should include compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land.	Ref 463

32. Development locations and allocations: Yew Tree Farm

Overview: In total, 83 respondents made 83 comments regarding the approach for Yew Tree Farm to remain in the Green Belt. Key themes are identified below.

Table 58 Summary of consultation responses to elements of the approach

Key Themes	Respondent Reference
<p><i>Comments in support (78):</i> The following reasons were given for supporting the approach for Yew tree Farm to remain in the Green Belt:</p> <ul style="list-style-type: none"> • The important role the site plays within the Green Belt. • The value of site for food production (this includes the comment from the Bedminster Down and Uplands Society). • The value of the site for biodiversity, with some respondents stating that the site should be declared a nature reserve and some noting the role the site plays as part of the green corridor between the Avon Gorge and Mendips. • The value of the site for as a resource supporting mental health and wellbeing of local residents. • Limiting the potential for increased congestion and pressure on existing services in the area. • Development should instead be focussed on brownfield sites. <p>One respondent supports the discontinuance of the site as an allocation. This respondent queries why the criteria applied as part of the approach to remove this allocation from the plan are not applied to other sites that are still proposed for development within the Green Belt.</p> <p><i>Comments objecting (1):</i> The developer (Redrow Homes) objects to the discontinuation of the allocation of Yew Tree Farm. It is stated that the site is not part of a working farm which is part of the reason set out by BCC for retaining the site in the Green Belt. The respondent states that there would be no ecological impacts that would not be mitigated as part of the development and that it would incorporate green infrastructure improvements. The development would form a definitive edge to the settlement boundary that would align with existing development of Bristol to the south of the A38. The site is also stated to be in a sustainable location close to local facilities with new housing to be delivered to achieve enhancements on the Future Homes Standard.</p> <p><i>Comments neither in support nor objection (4):</i> One comment queries whether a wildlife conservation study has been carried out for this site. Another respondent contests the statement included in relation to Yew Tree Farm that some existing Green Belt land needs to be allocated to meet Bristol's housing need. This respondent states that this text is contrary to BCC policy and the adopted NPPF.</p> <p>One comment notes a potential lack of clarity about whether land at Yew Tree Farm (and Land adjacent to Elsbert Drive) currently lies within the Green Belt.</p>	<p>12, 15, 22, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 40, 41, 42, 43, 44, 45, 47, 48, 50, 51, 52, 53, 54, 55, 56, 58, 59, 60, 61, 66, 67, 71, 74, 79, 82, 122, 124, 127, 131, 134, 136, 140, 144, 146, 154, 172, 175, 176, 192, 195, 199, 202, 208, 210, 211, 216, 224, 225, 226, 252, 280, 285, 288, 292, 302, 318, 362, 363, 368, 376, 382, 396 (support)</p> <p>99 (object)</p> <p>23, 95, 130, 228 (neither in support nor objection)</p>

Overview: In total two statutory bodies and partnerships made comments on the approach for Yew Tree Farm to remain in the Green Belt. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 59 Comments from statutory bodies and partnerships

Consultee	Reference
Natural England: Respondent supports the approach given the ecological value at the site.	Ref 208
Bath and North East Somerset Council: Respondent notes that the site is now not proposed to be removed from the Green Belt without indicating direct support or objection.	Ref 228

33. Development locations and allocations: Green Belt boundary

Overview: In total, 45 respondents made 45 comments regarding the approach to the Green Belt boundary in Bristol.

Table 60 Summary of consultation responses to elements of the approach

Key Themes	Respondent Reference
<p><i>Comments objecting (39):</i> A total of 17 respondents object to the approach to the Green Belt stating that the development of brownfield and urban intensification should be prioritised over development within the Green Belt. A further three respondents state that Green Belt land should not be built on in Bristol. One respondent states that there are no identified exceptional circumstances to support the release of land from the Green Belt. Furthermore, housing targets should not be used as a justification for the release of Green Belt land.</p> <p>A total of 14 respondents note the impacts of development of Green Belt land in terms of loss of green spaces that presently benefit human health and wellbeing, biodiversity, flood resilience and air quality.</p> <p>One respondent objects to the potential release of Green Belt land to the west of the A38 given that it could allow for the over-development this important open space.</p> <p>Two respondents note the lack of evidence to support any release of Green Belt land and one of these respondents states that the release of these sites is inconsistent, highlighting the examples of Yew Tree Farm and Land at Bath Road and their assessed performance in the West of England JSP Green Belt Assessment Stage 2.</p> <p>One respondent queries why the site they wish to develop is being retained in the Green Belt stating that it does not contribute to the Green Belt purposes set out in the NPPF.</p> <p><i>Comments neither in support nor objection (6):</i> One comment states that biodiversity should be encouraged within the Green Belt to mitigate impacts relating to climate change.</p> <p>Another comment states that development on former Green Belt land should be required to follow strict regenerative policies, with no reduction in biodiversity value permitted.</p> <p>Two respondents suggest that homes which achieve environmental, ecological and social benefits might be permitted on Green Belt land.</p> <p>One comment states that the existing Green Belt policy of the adopted plan works well.</p> <p>Another comment notes that the required level of housing cannot be met through building on previously developed land alone and states that there is a need to review the Green Belt within Bristol alongside its neighbouring authorities.</p>	<p>23, 31, 71, 99, 130, 144, 154, 166, 172, 180, 181, 198, 213, 225, 226, 236, 239, 240, 252, 256, 281, 290, 306, 314, 316, 321, 330, 362, 373, 377, 379, 407, 426, 428, 441, 448, 451, 453, 467 (object)</p> <p>34, 170, 209, 210, 296, 420 (neither in support nor objection)</p>

34. Development locations and allocations: Western Slopes

Overview: In total, 134 respondents made 135 comments regarding the approach to discontinue the existing allocation of three development sites at the Western Slopes. Key themes are identified below.

Table 61 Summary of consultation responses to elements of the approach

Key Themes	Respondent Reference
<p>General comments about the approach to discontinue the existing allocation of the three sites at the Western Slopes</p> <p><i>Comments in support (19):</i> Numerous respondents support the approach of discontinuing the allocation of land at the Western Slopes. The reasons given for this support include noting the importance of the site in terms of its ecological value and its role as ‘green lung’ for the site. A number of these respondents state that the land should be designated as a Local Green Space and a nature reserve. Several of these respondents also state that BCC should reject the planning application submitted for part of the Western Slopes.</p> <p>One of the respondents noting their support, also states that the approach to discontinuing the allocation of land at the Western Slopes needs to be supported by evidence.</p> <p>The Knowle West Regeneration Residents Planning Group supports the discontinuation of all three existing sites allocations and requests that the land is designated as a Local Green Space and Local Nature Reserve. This respondent notes that the development of this land would be contrary to the Knowle West Regeneration Framework (2012). They also request that the planning application submitted for the land is refused.</p> <p><i>Comments neither in support nor objection (113):</i> The majority of the remaining respondents commenting in relation to the approach to the allocation of the three sites at the Western Slopes, object to any development at these locations. Given that the Draft Policies and Development Allocations document (2022) proposes that the plan reflects the outcome of the existing application which contains part of the land within the three sites, is it not possible to say that these respondents are wholly in support of the approach to discontinue these allocations.</p> <p>The following reasons are provided by respondents objecting to development at the Western Slopes:</p> <ul style="list-style-type: none"> • The site is valued by local residents, in particular for providing green space and benefits for mental and physical health. • The site is valued for its benefits relating to nature conservation and food growing. The ecological value of the site has previously been recognised by BCC and the West of England Nature Partnership. Some respondents note that the site is designated as an SNCI and that insufficient biodiversity net gain would be achieved on the site. • The site helps to mitigate air pollution and is a ‘green lung’ for the city. • The site helps to mitigate climate change, with some respondents noting that BCC has declared a climate emergency. • Brownfield land should be prioritised for development over greenfield land. 	<p>67, 68, 70, 80, 82, 102, 127, 154, 208, 211, 216, 217, 226, 262, 292, 305, 322, 424, 442 (support)</p> <p>5, 15, 22, 26, 27, 29, 31, 32, 33, 34, 35, 36, 37, 40, 41, 42, 43, 44, 45, 48, 66, 71, 73, 74, 79, 122, 123, 134, 136, 144, 146, 159, 170, 172, 175, 176, 192, 195, 199, 202, 214, 231, 252, 253, 267, 268, 275, 288, 297, 302, 303, 304, 308, 309, 310, 311, 312, 313, 318, 321, 326, 327, 328, 329, 332, 333, 334, 335, 336, 337, 347, 348, 349, 359, 362, 363, 368, 369, 376, 380, 381, 382, 383, 387, 390, 394, 395, 396, 397, 398, 399, 405, 408, 410, 411, 412, 416, 418, 419, 423, 426, 427, 434, 435, 436, 437, 440, 447, 449, 450, 452,</p>

<ul style="list-style-type: none"> • The site is unsuitable for development due to its steep topography. • Development on the site could contribute to increased traffic congestion, and the surrounding roads are unsuitable for increased levels of traffic. • There are limited existing amenities and services in the area. • The social housing in the proposed development would be in an unpleasant location. <p>Many respondents also state that the site should be designated as a Local Green Space or nature reserve in order to protect it from future development. It is suggested that local people could support the maintenance of a designation of this type.</p> <p>Many of respondents also state that the planning application submitted for land which falls across the three sites, should be refused.</p> <p>One respondent requests that the historic objections to the site being allocated are recognised.</p> <p>One respondent noted that any decision to remove the allocation from these sites must be supported by suitable evidence, as this removal places pressure on other areas to provide land for housing.</p>	<p>454, 455 (neither in support nor objection)</p>
<p>Comments in relation to the approach to discontinue the site BSA1108 Land at Novers Hill, east of Hartcliffe Way and west of Novers Lane/Novers Hill</p> <p><i>Comments objecting (1):</i> Lovell Homes is the prospective developer of land within the site and they have submitted a planning application for this land. This respondent objects to the discontinuation of the allocation of this site for the following reasons:</p> <ul style="list-style-type: none"> • The discontinuation of the allocation of the site is in conflict with Draft Policy H1 given that it contributes to a lower level of housing delivery. • The site would provide a policy compliant level of affordable housing and its location is considered sustainable in terms of access to services and facilities. • The ecological role of the site, cited as a reason for the discontinuation of the allocation, is stated to not be confirmed as part of the planning application process and the adoption of current plan. Furthermore, there are retained allocations in the plan review which include SNCIs, and therefore the approach of discontinuing the Western Slopes allocation for reasons relating to ecology, is inconsistent. • The respondent's planning application would align with policy BG1 by seeking to enhance the tree belt running through the site. <p><i>Comments neither in support nor objection (1):</i> One respondent states that no development should occur within the site. Given that the Draft Policies and Development Allocations document (2022) proposes that the plan reflects the outcome of the existing application which contains part of the site, is it not possible to say that the respondent is wholly in support of the approach to discontinue the allocation.</p> <p>The respondent also states that the site should be used as a park or nature reserve to benefit nature and the local community.</p>	<p>117 (object)</p> <p>422 (neither in support nor objection)</p>
<p>Comments in relation to the approach to discontinue the site BSA1114 Land at Novers Hill, adjacent to industrial units</p>	<p>117 (object)</p>

<i>Comments objecting (1):</i> Lovell Homes similarly objects to the discontinuation of this site for reasons listed above in relation site BSA1108.	
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Overview: In total one statutory body made comments regarding the approach to discontinue the existing allocation of three development sites at the Western Slopes. Detailed comments from that statutory body were provided as follows:

Table 62 Comments from statutory bodies and partnerships

Consultee	Reference
General comments about the approach to discontinue the existing allocation of three development sites at the Western Slopes Natural England: Respondent supports the discontinuation of the allocations at the Western Slopes given their ecological value.	Ref 208

35. Development locations and allocations: Brislington Meadows

Overview: In total, 58 respondents made 58 comments on the approach to discontinue the existing allocation of Brislington Meadows. Key themes are identified below.

Table 63 Summary of consultation responses to elements of the approach

Key Themes	Respondent Reference
<p><i>Comments in support (9):</i> Eight respondents note support for approach of removing the land allocated for housing at the Brislington Meadows from the plan.</p> <p>One of these respondents states that the decision needs to be supported by appropriate evidence and five of these respondents add that the land should remain within the Green Belt or be designated as a Local Green Space or nature reserve.</p> <p><i>Comments in objection (1):</i> One comment is from a statutory consultee, with further detail provided in the next table in this report.</p> <p><i>Comments neither in support nor objection (48):</i> The majority of the respondents commenting in relation to the allocation of the Brislington Meadows site object to any development at the site. Given that the Draft Policies and Development Allocations document (2022) proposes that the plan reflects the outcome of the existing application for land within the site, is it not possible to say that these respondents are wholly in support of the approach to discontinue this allocation.</p> <p>The following reasons are provided by respondents objecting to development on Brislington Meadows:</p> <ul style="list-style-type: none"> • The site should remain in the Green Belt. • Brownfield land should be prioritised for development over greenfield land. • The site is of importance for mitigating flood risk and in terms of nature conservation and food growing. Some of these respondents also note concerns about whether biodiversity net gain would be achieved to a sufficient level as part of any development of the site. • The site is a valued green space for local residents. Some of these respondents note that Brislington has few green spaces, and therefore existing resources of this type should be protected. • The site helps to mitigate air pollution. • The proposed development would place pressure on existing services in the surrounding area and would contribute to increased levels of traffic. <p>Many respondents also state that the site should be designated as a Local Green Space or nature reserve in order to protect it from future development. It is suggested that local people could support the maintenance of a designation of this type. A number of respondents also state that the planning application submitted for the site should be refused.</p> <p>One respondent notes that any decision to remove the allocation from the plan must be supported by appropriate evidence, as the removal places pressure on other areas to provide land for housing.</p>	<p>80, 82, 122, 127, 199, 208, 211, 216, 288 (support)</p> <p>194 (object)</p> <p>15, 22, 26, 27, 29, 32, 33, 34, 35, 36, 37, 40, 41, 42, 43, 44, 45, 48, 66, 67, 71, 74, 79, 130, 134, 136, 144, 146, 154, 172, 175, 176, 195, 217, 226, 252, 259, 275, 292, 302, 318, 321, 362, 363, 368, 376, 382, 396 (neither in support or objection)</p>

Another respondent notes that the decision for the current planning application for Brislington Meadows should be made in line with national policy, including the NPPF.	
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Overview: In total two statutory bodies and partnerships made comments on the approach to discontinue the existing allocation of Brislington Meadows. Detailed comments from statutory bodies and partnerships were provided as follows:

Table 64 Comments from statutory bodies and partnerships

Consultee	Reference
Homes England: Respondent owns the site and states that while an Ecological Emergency has been declared since the allocation of the site, there is no evidence that the ecological value of the site has changed. Respondent highlights that the most notable change in circumstances in relation to the site is the shortfall in housing numbers in Bristol, in the years since its allocation. Respondent also states that the site could be developed to help meet local housing targets with capacity at the site for 260 homes including 30% affordable housing. It is also stated that the site can be developed to achieve 10% biodiversity net gain. The site is said to be in a highly sustainable location for housing development, close to public transport links and existing community facilities and services. Its development would thereby support climate change benefits by reducing the need to travel.	Ref 208
Natural England: Respondent supports the discontinuation of the allocation at the Brislington Meadows given its ecological value.	Ref 208

36. Next steps for the policies consulted on in 2019

Overview: In total two statutory bodies and partnerships made comments on the next steps for the policies consulted on in 2019.

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

Table 65 Comments from statutory bodies and partnerships

Consultee	Reference
National Highways: Respondent states that they are most interested in commenting further on the development strategy, policies relating to infrastructure and developer contribution, housing, economy, transport, climate change and sustainability, and any proposed and retained site allocations with regards to the potential impacts on the strategic road network. The quantum of employment development proposed at Avonmouth, the potential for industrial intensification and/or densification and potential impacts on the M5, M49 and A4 are also identified as being of particular interest to the respondent.	Ref 142
Historic England: Respondent states that reference should be included to Historic England's guidance on how historic environment and heritage assets can be considered in relation to the process of identifying suitable site allocations.	Ref 157

37. Appendix A: List of respondents in alphabetical order

Table 66 List of respondents in alphabetical order

Respondent Reference	Respondent Name
326	Abi Warren
11	Abigail Shepherd
204	Adblock Bristol
185	AEW (UK)
296	Alan Smith
146	Alasdair Cameron
429	Alcuin Wilkie
214	Alex Carr
447	Alex Dibble
72	Alex Harries
269	Alex McCann – Bath and North East Somerset Council
241	Alexander Smith
413	Alison Bromilow
450	Alison Clist
33	Alison Cole
34	Amanda Barrett
279	Amy Finnimore
439	Ana Sánchez
121	Anchor
446	Andrea Grace Mackay
404	Andrew Bridgewater
259	Andrew Green
310	Andrew Harrison
314	Andrew Varney
159	Ann Vowles
54	Anna Archer
386	Anna Haydock-Wilson
189	Avon Centre Charity
228	Bath and North East Somerset Council
187	Bailey of Bristol
94	Barney Smith
31	Bedminster Down & Uplands Society
190	Bellway Homes Ltd
158	Benoit Bennett
25	Bethany Harding
143	Bishopston Cotham & Redland Community Partnership Committee
103	Brabaco Ltd
361	Brian Zimmerman
340	Bridget
169	Bristol & District CAMRA
177	Bristol Advisory Committee on Climate Change
87	Bristol Airport
126	Bristol Avon Catchment Partnership
46	Bristol Boaters Community Association
57	Bristol Business Improvement Districts – Bristol City Centre, Redcliffe & Temple and Broadmead

80	Bristol Civic Society
161	Bristol Community Climate Action Project
131	Bristol Food Network CIC
136	Bristol Parks Forum
179	Bristol Port Company
130	Bristol Tree Forum
69	Bristol Water
2	British Sign & Graphics Association
193	Broadside Holdings Ltd
370	Bruce Denney
173	Buro Happold
191	Business West
17	Canal & River Trust
23	Carly Bryant
73	Caroline Hope
383	Caroline Lawrence
339	Caroline Perrington
288	Caroline Rigg
66	Caroline Wilson
442	Catherine Mary Robson
5	Catherine Robson
216	Catherine Withers
182	Central Fishponds Ltd
108	Centre for Sustainable Energy
184	Centrica Combined Investment Fund (C/O LaSalle Investment Management)
166	Chapel Hill Homes
379	Charlotte
306	Charlotte Daw
317	Charlotte Gage
384	Charlotte Sams
420	Chris Evans
273	Chris Freeman
244	Chris Lamb
13	Chris Lewis
375	Chris Powell
233	Chris Pratley
50	Chris Withers
374	Christie Cluett
8	Christine Smart
345	Christopher Burnett
178	Churchill Retirement Living
411	Claire Harris
321	Claire smith
294	Clare Hughes
152	Claverton Healthcare Ltd
174	Clifton & West of England Zoological Society
100	Clifton College
460	Cllr Anni Stafford-Townsend
458	Cllr Clara Denyer

459	Cllr Ed Plowden
324	Cllr Fabian Breckels
357	Cllr Henry Michallat
286	Cllr John Goulandris
425	Cllr Lisa Stone
457	Cllr Mark Bradshaw
378	Cllr Tom Hathway
396	Colin Clark
307	Conor Dylan MacDonald
154	CPRE Avon & Bristol
139	Crest Nicholson Plc
354	D Taylor
247	Dan Windross
200	Dandara Living Developments Ltd
48	Danica Priest
360	Daniel Key
62	Daniel Williams
309	Dave Cridge
125	David Angel
98	David Brown
26	David Campbell
84	David Chavannes
380	David Clegg
313	David Fakray
331	David Kotlyar
65	David Netherwood
242	David Sambucci
350	David Wedge
421	David Wilcox
342	Dawn Nielsen
40	Debbie Loosley
42	Deborah Hurst
220	Denzil Foakes
77	Department for Education
91	Developments Bristol
219	Dominic Hogg
164	Dominvs Group
382	Donna Cullen
211	Dougal Matthews
104	Dowlas Property Group
232	E & S Bristol
368	Edward Cheney
186	Edward Stephen Peacock
153	Elizabeth Blackwell Properties Ltd
325	Elizabeth Lynch
373	Elizabeth Parker
47	Elizabeth Stephens
312	Ellen Wilson
334	Emily Johnstone
218	Environment Agency

14	Eric Sille
168	Esteban Investment Ltd
347	Ester de Roij
371	Eva Greene
298	Evan Sweet
287	Finola Holyoak
362	Fiona Cresswell
79	Fiona Lewis
369	Frances Whitlock
302	Friends of the Western Slopes Novers Hill
207	Fusion Students
19	Garry Jones
74	George Cook
78	George D
282	George Thomas Knowlson-Baker
51	Georgina Kellaway
416	Georgina Mortimer
253	Gerard Spillane
440	Giovanni Lopresti
133	Gladman Developments
240	Gordon Ashton
1	Grenville Johnson
132	Hallam Land Management, Wilson Enterprises & Parker Strategic Land
445	Hannah Chittell
341	Hannah fort
41	Harvey Lilley
261	Haydn Gill
372	Hayley Thomas
111	Heather Mack
254	Hilary Abrahams
71	Hilary Rydon
201	Hill Group
157	Historic England
116	Hoare Lea
147	Home Builders Federation
194	Homes England
128	Hotwells & Cliftonwood Community Association
263	Hugh Nettelield
120	IM Land Ltd
29	Ingrid Bates
181	InvestIn
454	Irene Hathway
225	Isabelle Milne
304	Ivy Blackmore
329	J Tutton
407	Jack Olav Husebo
438	Jackson Moulding
394	Jade Howell
376	Jaime Samantha Breitnauer
318	James Drozd

101	James Lyon
399	James Mundy
272	James Ward
436	Jane Gibson
412	Jane Noble
252	Janis Jacqueline Beavon
82	Jasmine Beard
6	Jayne Davis
86	Jean & Colin Bennett
336	Jen Collins
358	Jennifer Bhambri-Lyte
400	Jenny Heyer
260	Jeremy Halpenny
333	Jess Wright
236	Jessica Walker
35	Jim Mayger
275	Joanne Conroy
112	Jodie Partington
231	Jody Reed
428	Joe Banks
238	John
437	John & Tracey Davey
45	John Beard
449	John Corcoran
276	John Courtney
12	John Knight
332	Jolanta Bathe-Taylor
30	Jonathan Marks
397	Jonathan Thewlis
348	Jonathan Walford
3	Judith Brown
15	Julia Halpenny
83	Julian Clover
434	Julie Tan
297	Karen Borek
398	Karen Jennifer Reeves
311	Karen Locke
377	Karen Michelle Brown
64	Karen Mullins
295	Kate 6
316	Kate Laver
256	Kate leftly
224	Kate Milne
68	Kate Saunders
217	Kate Searle
448	Kate Searle
281	Katherine Burton
319	Kathleen Katuszka
195	Kathryn Davies
402	Kathryn Johnson

36	Katie Trace
344	Katya Aloni
70	Keith Saunders
175	Keith Way
274	Kevin Baker
110	Kevin Chidgey
245	Kevin Davis
156	Kevin Draper
305	Kim Drozd
451	Kim Hicks
301	Kirsty Stitfall
206	Knowle Neighbourhood Planning Group
127	Knowle West Regeneration Residents Planning group
9	Landsmith Associates
223	Lawrence Weston Neighbourhood Planning Forum
197	Legal & General
387	Lesley Franklin
10	Lewis Wheatley
212	Lex Morley
430	Lhosa Daly
381	Liam Dillon
129	Lindsey Garwood
355	Lisa Clevely
58	Lisa Colledge
93	Live West
122	Lizzie Darville
322	Lois Greer
283	Louise Gardner
320	Louise Haynes
417	Louise stone
117	Lovell Homes
435	Lucy Goddard
267	Luke Collins
43	Lydia Callaghan
63	Lyn Applin
289	Lynn Spencer
467	M Lewis
461	M Regan
346	Maddy Longhurst
409	Maggie Froude
192	Manor Woods Valley Group
85	Margaret Jones
352	Maria Hernandez-Fuentes
441	Maria Siepe
7	Marine Management Organisation
464	Mark Letcher
443	Martin Chittell
432	Martin Fodor
27	Martin Westlake
172	Martynh Cordey

137	Matt Hempstock
18	Matthew Montagu-Pollock
418	Maximiliane Gambier
423	Melissa Smith
227	Merche Clark
424	Michael David Akers
237	Michael Mann
221	Michele Tedder
278	Michelle King
22	Michelle Lee Barker
415	Miha klement
226	Mike McSweeney
246	Mikel Pascual
414	Molly Petts
39	Mr & Mrs D Sutton
96	Mr & Mrs Ham
385	Mr Andrew betteridge
299	Mr Nicholas John Borek
290	Mrs Louise Humphrey
308	Mrs Maureen Heppee
199	Nasim Dumont-Namin
406	Natasha Styles
163	National Grid
142	National Highways
208	Natural England
114	Network Rail
113	NHS North Bristol Trust
196	NHS Property Services
466	Nick Porter
426	Nick Smith
335	Nicola Dellard-Lyle
364	Nik Kieboom
303	Norman Gillian
463	North Somerset Council
75	Olly Alcock
106	Pam Morgan
202	Parvaneh Taghinejadnamini
453	Patrick Morrison
67	Paul Becker
198	Pearce Planning
167	Persimmon Homes Severn Valley
20	Peter Brimble
105	Peter Browne
102	Peter Daniels
49	Peter Ellis
266	Peter Kouri
285	Phil Owen
431	Pippa Grace Robinson
215	Rachael Groom
390	Rachael Hosey

21	Rachel & Lee Hall
405	Rachel Mansi
140	Rachel McGee
222	Rachel Tuckett
95	Raymond Sidney Burnell
257	Rebecca Woodward
99	Redrow Homes
255	Richard A Drake
343	Richard Andrew William Simpson
422	Richard Buckley
328	Richard Fullwood
24	Ricky & Lesley Ahtow
392	Rob Bryher
262	Rob Carmier
410	Rob Kershaw
230	Robbie Gillett
149	Robert Davies
419	Robert Fisher
176	Robert Oliver
81	Robyn Reed
61	Roland Kandiah
55	Ronald Bickley
38	Ros Myers
292	Rosamund Kidman Cox
265	Rosie Walker
229	Rowan Hanson-Iles
395	Ruth Clinch
188	S & B Automotive Academy
337	Sally Harvey
243	Sally Martin
37	Samantha Bignell
330	Samantha Moore
124	Sandra Williams
123	Sarah Brook
270	Sarah Jackson
327	sarah Phillips
455	Sarah Suchecki
52	Sarah Williams
144	Save Ashton Vale Environment
203	Savills
280	Scott Wallis
462	Severnnet
16	Sheila Holt
53	Sophie Beard
248	Sophie Cooper
465	South Gloucestershire Council
150	South West Housing Association Planning Consortium
165	Sovereign
89	Sport England
151	St Modwen Homes

277	Stelios Mantopoulos
134	Stephany Meissner
366	Stephen Small
118	Stride Brothers Ltd
109	Structadene Group Ltd
349	Stuart Biggs
4	Sue Strickland
456	Susan Acton-Campbell
452	Susan nichols
359	Susan Willingham
183	Sustrans
408	T Griffee
162	Taylor Wimpey
60	Teresa Tremlett
59	Terry Keen
90	The Coal Authority
268	Tim Marriner
209	Tiny House Community Bristol
44	Toby Baker
365	Tom Blakey
403	Tom Clarke MRTPI
56	Tony Box
363	Tony Pitt
391	Tracy Kramer
141	UKGBC
76	University Hospitals Bristol & Weston NHS Foundation Trust
234	UoB
210	Urban Agriculture Consortium
235	UWE
291	Valerie Steel
115	Veronica Wignall
28	Vicky Smale
427	vicky smith
205	Victoria Hall Management Ltd
353	Vinay Pandya
92	Vistry Homes
239	Vivi Sargioti
284	W Chen
119	Waddeton Park Ltd
88	Watkin Jones Group
135	We Can Make
213	Wendy Batley
32	Wendy Hogarth
323	Wendy Morris
148	Wessex Water
155	Westbury-on-Trym Society
171	Whitbread & Olympian Homes
97	Wildstone Capital Ltd
367	William Thomas
170	Windmill Hill & Malago Planning Group

145	Woodstock Homes
160	Wyevale (Bristol) Ltd
180	Yara Capital
356	Zoe Baird