

Bristol Local Plan Publication Version (November 2023) Statement of Consultation

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1. Introduction

Purpose of document

This document sets out how Bristol City Council has sought participation from communities and stakeholders during preparation of its Local Plan. In doing so it demonstrates how the council has complied with the requirements of its Statement of Community Involvement (2015) and Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Alongside the Local Plan Publication Version, Regulation 19 requires the council to publish a statement setting out the following:

- a) which bodies and persons were invited to make representations under Regulation 18;
- b) how those bodies and persons were invited to make such representations;
- c) a summary of the main issues raised by those representations; and
- d) how the issues have been addressed in the Local Plan.

Overview of Local Plan preparation process

There were three main stages in the preparation of the Local Plan:

Stage 1 – Local Plan Review: Consultation document (2018)

Stage 2 – Local Plan Review: Draft Policies and Development Allocations –

Consultation document (2019)

Stage 3 – Local Plan Review: Draft Policies and Development Allocations – Further

Consultation document (2022).

Stage 1 - Local Plan Review: Consultation document (2018)

In February 2018 the council published the 'Bristol Local Plan Review – Consultation' document for comment.

As the Core Strategy had been adopted in 2011, one of the main aims of the 2018 document was to seek views on how the city's strategic housing needs could be met over the new plan period to 2036.

These needs had been identified in the West of England Joint Spatial Plan. Prepared by Bath and North East Somerset, Bristol City, North Somerset and South Gloucestershire councils, the Joint Spatial Plan included a requirement of 33,500 new and affordable homes to be delivered in Bristol by 2036.

The other main aim of the 2018 document was to seek comment on the updating of a number of existing Local Plan policies. This updating was necessary to reflect changes to national planning policy and local issues since the adoption of the Core Strategy. Initial proposals for the approach to the management and provision of specialist forms of housing, climate change, health and wellbeing and open space protection were set out for comment.

<u>Stage 2 – Local Plan Review: Draft Policies and Development Allocations – Consultation document (2019)</u>

In March 2019 the council published the 'Bristol Local Plan Review – Draft Policies and Development Allocations – Consultation' document for comment.

This document had been informed by responses to the 2018 consultation and was published in the context of the Joint Spatial Plan, which had reached the examination stage.

The 2019 consultation document contained draft policies relating to the proposed development strategy, infrastructure contributions, urban living, housing, economy, green infrastructure, transport, climate change, design and conservation, and health and well-being. It was supported by an Annex containing proposed allocations for new homes, industrial or mixed-use development. A document setting out sites proposed for Local Green Space and Reserved Open Space protection was also published.

<u>Stage 3 – Local Plan Review: Draft Policies and Development Allocations – Further</u> Consultation document (2022)

In November 2022 the council published the 'Bristol Local Plan Review – Draft Policies and Development Allocations – Further consultation' document for comment.

One of the main aims of the document was to set out the strategic planning context for the Local Plan. This followed the Joint Spatial Plan's withdrawal from examination in April 2020 and work being discontinued on the West of England Combined Authority's Spatial Development Strategy.

Due to the passage of time and changing strategic context it was also necessary to further update existing Local Plan policies. Comment was sought on draft policies relating to housing provision, affordable housing, net zero and climate change, biodiversity and nature recovery, food sustainability, shopping, centres and the evening economy, design and development locations and allocations.

2. Who was consulted?

Members of the Local Plan Consultation Database were kept informed of progress and opportunities for involvement throughout the preparation of the Local Plan. The database contains approximately 2,500 residents, businesses, groups, organisations, statutory bodies and other parties who have expressed an interest in being involved in preparing the Local Plan. More information on the membership of the database is provided in Appendix 1.

3. Consultation methods used

A range of consultation methods was used throughout the plan's preparation in accordance with the council's Statement of Community Involvement to ensure ongoing, proportionate and effective engagement. These included:

- Consultation documents to seek views on draft proposals and policies;
- Council website, for example:
 - Awareness-raising articles published on its Newsroom pages;
 - Planning Policy pages containing consultation documents and information on how comments could be made;
 - The 'Ask Bristol' online consultation and engagement hub, where consultations were publicised and comments sought via questionnaires / surveys.
- Discussion events, e.g. workshops / round-table discussions;
- Drop-in events / exhibitions in accessible locations;
- Emails and letters to the Local Plan Consultation Database, for example with progress updates on Local Plan preparation and how to get involved with consultations;
- Meetings to discuss and gain feedback on emerging proposals and policies.
 These included:
 - liaison meetings with Bristol Neighbourhood Planning Network member groups, the Bristol Civic Society and the Bristol Property Agents Association;
 - meetings with statutory bodies and amenity / local community groups to discuss specific issues;
 - o on-going meetings with neighbouring councils;
 - regular meetings with the cross-party Local Plan Working Group of BCC Councillors.
- Press releases and launches to publicise Local Plan consultations;
- Questionnaires / surveys produced for Local Plan consultations placed on the Ask Bristol online consultation and engagement hub;
- Social media, for example postings about Local Plan consultations on Ask Bristol's Twitter account;
- An on-going Call for Sites exercise in which developers, landowners, businesses and other organisations were invited to put forward potential sites for new homes and/or economic development within Bristol. These informed the selection of development allocations included in the Local Plan Publication Version.

More detail on the methods used at each stage in preparing the Local Plan is provided in Appendix 2.

4. Summary of main issues raised and how they were addressed

This section sets out the main issues that were raised during the preparation of the Local Plan and how they were addressed.

Stage 1 – Local Plan Review: Consultation (2018)

In February 2018 the council published the 'Bristol Local Plan Review – Consultation' document for comment. A total of 436 responses were received. The main issues raised and how they were addressed in the Local Plan are set out in the tables below.

Vision – how will the city develop?

Table 1 - main issues raised on Vision and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Too vague. Too city centre focused. Specific reference to / more emphasis needed on: sustainability and climate change; historic environment; affordable housing; natural environment; protecting tree cover; mixed and balanced communities; children and a child-friendly city; resources and waste; build to rent housing; Avonmouth and Port of Bristol; stronger commitment to delivering housing. Does not fully align with 	The Local Plan Publication Version contains a positive vision for the future development of Bristol looking ahead to 2050. It addresses as succinctly as possible the key issues and needs facing the city, charting the expected progress on how they will be met. The vision is supported by a set of aims and objectives. These provide more detail on how the local plan will address the issues identified in the vision. References are provided to chapters in the local plan which contain policies with a particular focus on responding to the aims and objectives. The key matters raised in the 2018, 2019 and 2022 consultations have informed the vision, objectives, aims and / or policies of the Local Plan Publication Version.
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Strategy - meeting housing needs through urban living

Comments on general approach to proposed strategy

Table 2 - main issues raised on general approach to proposed strategy and how they were addressed in the Local Plan

Ma	ain issu	es raised	Но	ow they were addressed
•	Housir	ng target:	•	Housing target:
	0	Concern target not deliverable given current housing completion rates, plus is an underestimate.		 Local Plan Publication Version Policy H1 'Delivery of new homes – Bristol's housing requirement' contains an appropriate housing target for the plan period. Provided in Local Plan Publication
	0	More detail needed on distribution and deliverability of housing in sites across Bristol.		Version's 'Development Strategy' chapter and supporting site allocations annex.
•		er emphasis needed	•	Requests for greater emphasis:
	on:	Other housing types such as affordable,		 Addressed in Local Plan Publication Version Policy H4 'Housing type and mix'.
		temporary and child-friendly housing.		 Addressed in various Local Plan Publication Version policies including IDC1 'Development contributions and
	 Infrastructure required to support housing delivery. Protecting the environment. 	biodiversity in new dev Policy GI A 'Open Space Recreation'; T2 'Transp infrastructure improve	CIL'; BG1 'Green Infrastructure and biodiversity in new development'; Policy GI A 'Open Space for	
			Recreation'; T2 'Transport infrastructure improvements'; and CF1 'Provision of community	
	0	Employment land needed to		facilities'. O Covered by policies in Local Plan
		accompany housing delivery.		Publication Version chapter on 'Biodiversity and Green Infrastructure', amongst others.
				 Addressed in Local Plan Publication Version Policy E2 'Economic development land strategy'.
•		ic England endorsed Living approach	•	Urban living approach supported by published Urban Potential assessment.

Main issues raised	How they were addressed
provided potential risks to city's historic townscape and setting of heritage assets are addressed in relation to development capacity assumptions.	
Natural England sought more ambition for natural environment, e.g. greater prominence to development of West of England Green Infrastructure Plan, plus commitments to enhancing Green Infrastructure network and achieving net gains in biodiversity.	Addressed by policies in Local Plan Publication Version chapter on 'Biodiversity and Green Infrastructure', amongst others.

Comments on transport strategy

Table 3 - main issues raised on transport strategy and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Insufficient strategic transport plan and proposals to support planned growth. 	 Addressed by Local Plan Publication Version Policy T2 'Transport infrastructure improvements'.
Lack of reference to transport impacts and requirements resulting from urban living approach.	 Urban living approach supported by published Urban Potential assessment. Transport impacts of proposals covered by Local Plan Publication Version Policy T3A 'Transport development management'.
 More emphasis needed on active travel, including strategic pedestrian and cycle network proposals. Child-friendly streets and promotion of electric vehicles also advocated. 	 Provided in Local Plan Publication Version policies T1 'Development and transport policies' and T6 'Active travel routes'.

Main issues raised		How they were addressed	
•	Cross-references sought to relevant plans: Bristol Transport Strategy, City Centre Framework, West of England Local Cycling and Walking Infrastructure Plan and BCC's Transport Development Management Guide.	•	Appropriate cross-references made in various Local Plan Publication Version's 'Transport' chapter policies.

Central Bristol

Proposal CDS 1: Bristol City Centre

Table 4 - main issues raised on Proposal CDS 1: Bristol City Centre and how they were addressed in the Local Plan

Ma	ain issues raised	How they were addressed		
•	Need for flexible policies to enable resilience, diversity and balance in uses.	Diversity and mix of uses referred to in Local Plan Publication Version Policy DS1 'Bristol City Centre'.		
•	Requirement for supporting transport infrastructure.	 Policy DS1 'Bristol City Centre' refers to improved transport systems. Also addressed by Publication Version Policy T2 'Transport infrastructure improvements'. 		
•	Concerns about how a diverse housing stock will be delivered to balance existing proliferation of flats and student housing.	 Appropriate mix referenced in Policy DS1 'Bristol City Centre'. Also covered by Publication Version H4 'Housing type and mix'. 		
•	More detail on specific housing allocations and targets.	 Local Plan Publication Version contains supporting development allocations annex. Indicative housing capacity provided in supporting text to Policy DS1 'Bristol City Centre'. Target set out in Policy H1 'Delivery of new homes – Bristol's housing requirement'. 		
•	Tall Buildings and Urban Living approach: concern about impact on heritage assets and lack of clarity on type of housing to be delivered. Alternative mid-	 Policy DS1 'Bristol City Centre' refers to development conserving heritage assets and advocates a mix of housing types. Issues also covered by Policy DC2 'Tall buildings' which sets out criteria to ensure important planning considerations are appropriately 		

Main issues raised	How they were addressed
rise approach considered more appropriate.	considered. Policy H4 'Housing type and mix' sets out overall approach to securing appropriate mix of housing types.
More references to walking and pedestrian facilities and proposals needed.	 Addressed with specific references made in Policy DS1 'Bristol City Centre' to new and improved walking routes. Also addressed in Policy T2 'Transport infrastructure improvements' which identifies planned enhancements to transport infrastructure.

Proposal CDS 2: Extended Bristol Temple Quarter Enterprise Zone

Table 5 - main issues raised on Proposal CDS 2: Extended Bristol Temple Quarter Enterprise Zone and how they were addressed in the Local Plan

M	Main issues raised		How they were addressed	
•	Appropriateness of tall buildings.	•	Local Plan Publication Version Policy DS2 'Bristol Temple Quarter' makes clear that tall buildings may be appropriate and cross refers to Policy DC2 'Tall buildings'. This sets out criteria to ensure important planning considerations are appropriately considered.	
•	Potential operational impacts on existing noise-generating businesses from new uses.	•	Covered by Local Plan Publication Version policies HW1 'Pollution control and water quality' and HW1A 'Noise'. These will ensure noise-sensitive development proposals consider nearby existing uses.	
•	Need for flexibility in proposed land uses, which may be needed to respond to market circumstances.	•	Addressed in Publication Version Policy DS2 'Bristol Temple Quarter' with reference to the development of a wide range of uses.	
•	Historic England sought greater clarity on proposals to 'transform' Temple Meads station to ensure its Grade 1 listed status is reflected. They also saw the Enterprise Zone extension as an opportunity to enhance important historic sites, which could be highlighted in the proposal.	•	This has been clarified for Local Plan Publication Version Policy DS2 'Bristol Temple Quarter' with reference to development enhancing this heritage asset. Designation of Silverthorne Lane Conservation Area in 2021 also relevant to this issue.	

Proposal CDS 3: St. Philip's Marsh

Table 6 - main issues raised on Proposal CDS 3: St Philip's Marsh and how they were addressed in the Local Plan

Main issues raised		How they were addressed
•	Operational impacts on existing noise-generating businesses from new uses, leading to their eventual loss.	 Covered by Local Plan Publication Version policies HW1 'Pollution control and water quality' and HW1A 'Noise'. These will ensure noise-sensitive development proposals consider nearby existing uses.
•	Need to retain a diverse employment base including light industrial in sustainable locations.	Local Plan Publication Version Policy E2 'Economic development land strategy' sets out city-wide approach to creating a diverse employment land supply. Policy DS3 'St Philip's Marsh' provides more detail on the types of workspace expected to be delivered in different parts of this location.
•	More detail needed on	More detail sought:
	proposals for:River Avon flood and water management.	 Addressed in Local Plan Publication Version policies FR1 'Flood risk and water management' and FR2 'Bristol Avon Flood Strategy'.
	 Greenways and sustainable travel. 	 Covered by references in Local Plan Publication Version Policy DS3 'St Philip's Marsh' to creation of an enhanced multi-purpose greenway and new and enhanced walking and cycle routes.
•	Wholesale and Fruit Market should be recognised and safeguarded as important part of city's food infrastructure.	Any proposals for the Wholesale and Fruit Market will be considered against all relevant planning policies and considerations.
•	Avon Meads Retail Park should be included as has redevelopment potential.	Lack of evidence to suggest redevelopment potential in short- or medium-term.
•	Environment Agency sought reassurance through policy revisions that there would be no adverse impacts on third party interests resulting	 Local Plan Publication Version Policy DS3 'St Philip's Marsh' sets out approach to flood risk in this location. Supported by Publication Version policies FR1 'Flood risk and water management' and FR2 'Bristol Avon Flood Strategy'.

Main issues raised	How they were addressed
from new development or associated mitigation measures. They also advised regard be had to River Avon Tidal Flood Risk Management Strategy and updated Strategic Flood Risk Assessment.	
Network Rail requested consideration be given to impacts of future proposals and the round-the-clock, industrial operations of St Philip's Marsh Train Depot.	 Addressed by Local Plan Publication Version policies HW1 'Pollution control and water quality' and HW1A 'Noise'. These will ensure noise-sensitive development proposals consider nearby existing uses.

Proposal CDS 4: Western Harbour – Development at Cumberland Basin

Table 7 - main issues raised on Proposal CDS 4: Western Harbour – Development at Cumberland Basin and how they were addressed in the Local Plan

Main issues raised		How they were addressed	
•	Potential harm to important character, views, heritage assets and features.	 Local Plan Publication Version Policy DS4 'Western Harbour' refers to proposals having regard to area's important heritage assets and responding appropriately to key views and landmarks. 	
•	Need for new transport infrastructure.	 Policy DS4 'Western Harbour' includes references to provision of reconfigured road system and new walking and cycling routes. 	
•	Proposals too vague.	 Further detail added to Local Plan Publication Version Policy DS4 'Western Harbour'. 	
•	Loss of important maritime industries.	 Supporting text to Local Plan Publication Version Policy DS4 'Western Harbour' makes clear that maritime industries at Underfall Yard will continue to be retained. 	
•	Proposals for roads and tall buildings considered inappropriate.	 Rationale for replacement roads provided in introductory text to Policy DS4 'Western Harbour'. Policy makes clear tall buildings may be appropriate and cross refers to Policy DC2 'Tall buildings'. This sets out criteria to 	

Main issues raised	How they were addressed
	ensure important planning considerations are appropriately considered.
Loss of green / open spaces.	 Addressed with references in Policy DS4 'Western Harbour' to the retention and provision of high quality public open spaces.
Need for flood Risk mitigation and infrastructure improvements.	 Policy DS4 'Western Harbour' sets out approach to provision of flood risk mitigation measures in this location. Supported by Publication Version policies FR1 'Flood risk and water management' and FR2 'Bristol Avon Flood Strategy'.
Local wildlife assets such as Avon New Cut Local Nature Reserve should be protected and enhanced.	 Addressed with references in Policy DS4 'Western Harbour' to the retention and provision of high quality public open spaces incorporating green infrastructure. Also covered by policies in the Local Plan Publication Version's chapter on 'Biodiversity and nature recovery'.
Improving air quality in this location needs to be considered and addressed.	 Addressed by references to development including new sustainable travel routes in this location. Issue also addressed by Local Plan Publication Version Policy HW2 'Air quality'.
 Remove River Avon New Cut area as has different character and important land uses and assets. 	 River Avon New Cut area considered appropriate for inclusion given its development potential and locational attributes, as described in the policy.
New policy needed to replace Central Area Plan Policy BCAP41 'The Approach to Harbourside' in order to focus tourism development in Harbourside area.	 Approach to tourism-related development set out in Local Plan Publication Version policies DS1 'Bristol City Centre' and SSE1 'Supporting Bristol's Centres - network and hierarchy'.
Bonded Warehouses should be used for housing instead of new developments being promoted.	Supporting text to Publication Version Policy DS4 'Western Harbour' explains that the policy provides for the appropriate mixeduse conversion of the bonded warehouses subject to relevant planning policies for design and conservation.

Main issues raised	How they were addressed
Historic England considered that proposals should be informed by adequate assessment of existing heritage assets.	Policy DS4 'Western Harbour' refers to proposals having regard to area's important heritage assets and responding appropriately to key views and landmarks.
 North Somerset Council and Wessex Water requested consultation on any proposed changes to road network and water infrastructure, respectively. 	Consultation will be undertaken in accordance with relevant requirements as proposals emerge.

East Bristol

Table 8 - main issues raised on East Bristol and how they were addressed in the Local Plan

Main issues raised	How they were addressed
South Gloucestershire Council advised joint- working so that proposals with cross-boundary impacts such as transport, employment land and infrastructure (e.g. schools) provision can be adequately addressed.	Ongoing cross-boundary engagement has taken place in preparation of Local Plan.

Proposal CDS 5: Lawrence Hill

Table 9 - main issues raised on Proposal CDS 5: Lawrence Hill and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
 Concerns about operationa impacts on existing businesses from new residential uses, leading to their eventual loss. 	 Addressed by Local Plan Publication Version policies HW1 'Pollution control and water quality' and HW1A 'Noise'. These will ensure noise-sensitive development proposals consider nearby existing uses. 	
 Specific reference / more emphasis sought on: school provision 	 Specific references sought: Not considered necessary to make particular mention as covered by 	
requirements to	general reference in Local Plan	

Main issu	es raised	How they	were addressed
	meet housing growth.		Publication Version Policy DS6 'Lawrence Hill' to new development providing supporting infrastructure,
0	Bristol to Bath Railway Path		services and community facilities.
	corridor and its importance to active travel.	0	Policy DS6 'Lawrence Hill' refers to Bristol and Bath Railway Path and how development will be expected to
0	High level of advertising displays	nedestrian and cycle links to it	
	boards locally compared with other parts of the city and their harmful impacts on residential amenity.	0	Addressed in Local Plan Publication Version Policy AD1 'Advertisements'.

Proposal CDS 6: Central Fishponds

Table 10 - main issues raised on Proposal CDS 6: Central Fishponds and how they were addressed in the Local Plan

M	ain issues raised	How they were addressed	
•	Operational impacts on existing businesses from new residential uses, leading to their eventual loss.	 Addressed by Local Plan Publication Version policies HW1 'Pollution control and water quality' and HW1A 'Noise'. These will ensure noise-sensitive development proposals consider nearby existing uses. 	
•	Appropriateness of tall buildings.	 Local Plan Publication Version Policy DS7 'Central Fishponds' makes clear that tall buildings may be appropriate and cross refers to Policy DC2 'Tall buildings'. This sets out criteria to ensure important planning considerations are appropriately considered. 	
•	Need to restrict additional student housing to protect amenity.	 Issue addressed in Local Plan Publication Version Policy H7 'Managing the development of purpose-built student accommodation'. 	
•	Risk of overdevelopment with harmful impacts such as car parking pressures due to lack of supporting infrastructure provision.	 Policy DS7 'Central Fishponds' refers to new development providing supporting infrastructure, services and community facilities. Transport impacts of proposals covered by Local Plan Publication Version 	

Main issues raised	How they were addressed	
	Policy T3A 'Transport development management', amongst others.	
Need for sustainable transport improvements to address air quality issues.	Policy DS7 'Central Fishponds' makes reference to development being supported by public transport enhancements and cycle and pedestrian route improvements.	
 Risk of new development reversing recent local improvements in biodiversity. 	This issue covered by policies in the Local Plan Publication Version's chapter on 'Biodiversity and nature recovery'.	

South Bristol

Table 11 - main issues raised on South Bristol and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Failure to address economic development and long-term socio-economic condition of South Bristol.	 Supporting text to Local Plan Publication Version chapter on South Bristol explains approach to addressing this issue. Building on recent significant health, workspace, educational and transport infrastructure improvements and provision, it refers to Local Plan approach of continuing to safeguard large areas of land for industry. New industry and distribution locations are also proposed, while new workspace will be created in growth and regeneration areas as well as part of mixed-use development allocations.
Lack of a co-ordinated or integrated approach, e.g. housing delivery needs to be supported with a transport strategy, including active travel links, and sufficient employment land allocations.	 Area policies within South Bristol chapter of Local Plan Publication Version make reference to expected local transport improvements as part of new development proposals. Overall approach set out in Local Plan Publication Version Policy T2 'Transport infrastructure improvements'. Provision of employment land allocations addressed in above bullet point. City-wide approach to employment land provision set out in Local Plan Publication Version 'Policy E2: Economic development land strategy'.

Proposal CDS 7: Central Bedminster and Parson Street

Table 12 - main issues raised on Proposal CDS 7: Central Bedminster and Parson Street and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Potential negative impacts on character and supporting infrastructure resulting from scale, density and height of proposed development. High density mid-rise and terraced housing advocated as an alternative.	The area's good public transport infrastructure and proximity to city centre, as described in supporting text to Local Plan Publication Version Policy DS8 'Central Bedminster', support higher density development approach. Potential impacts on character addressed in Policy DS8's reference to development taking account of the Bedminster conservation area, supported by policies in the Local Plan's chapter on 'Design and conservation'.
 Need to ensure type and tenure of new housing provides high levels of affordable, social rent or community housing, plus homes for families and the elderly. 	 Development contributing to an appropriate mix of housing type referenced in Policy DS8 'Central Bedminster'. Issue also covered by Publication Version Policy H4 'Housing type and mix'.
Loss of employment / business sites.	 Policy DS8 'Central Bedminster' makes reference to development including the provision of high quality workspace, providing for a range of business uses, as part of mixed-use development. The area's good credentials for higher density mixed- use development are explained in supporting text to the policy with reference to high public transport accessibility and proximity to the city centre. Such an approach is also considered appropriate given evidence of under-used or vacant commercial sites in this location.
Inadequate public transport and community infrastructure to support proposed growth.	The area's good public transport infrastructure is explained in introductory text to Policy DS8 'Central Bedminster' with reference to train station and MetroBus services. Policy refers to how new development will deliver enhancements to train station, strengthened pedestrian and cycle links and local highway improvements.

Main issues raised	How they were addressed
	Policy DS8 also refers to new development providing supporting infrastructure, services and community facilities.
Impacts on open spaces.	Policy DS8 'Central Bedminster' refers to development including green infrastructure and public realm enhancements as well as new and enhanced open space, with reference to Policy GI A 'Open space for recreation'.
Need for a masterplan to ensure a 'joined-up' approach, including effective community involvement.	Policy DS8 'Central Bedminster' makes reference to development proposals being expected to accord with regeneration frameworks which will coordinate approach to development across the area. Community engagement on preparation of these will increase their effectiveness in ensuring a coordinated approach.

Proposal CDS 8: Brislington

Table 13 - main issues raised on Proposal CDS 8: Brislington and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Development should be higher density than proposed.	Local Plan Publication Version Policy DS9 'Brislington' sets out an appropriate approach taking into account development potential and locational characteristics, as described in supporting text to the policy.
Loss of suburban character.	• Supporting text to Policy DS9 'Brislington' identifies opportunities for an urban living approach along parts of the Bath Road corridor. This is considered appropriate given area's good public transport accessibility and evidence of under-used sites. Policy DS9 addresses design / character issues with reference to new development creating stronger and more coherent built frontages to Bath Road, with associated improvements to the public realm. This will be supported by the application of policies in the Local Plan Publication Version's 'Design and conservation' chapter.

Main issues raised How they were addressed		How they were addressed
•	Inappropriateness of tall buildings.	 Tall buildings not specifically referred to in draft policy and this is maintained in Publication Version Policy DS9 'Brislington'. Any tall building proposals will be considered with reference to Policy DC2 'Tall buildings' and all other relevant policies.
•	Loss of employment / industrial land to residential use.	 Policy DS9 'Brislington' makes reference to development including the provision of high quality workspace, providing for a range of business uses, as part of mixed-use development. Approach of Policy DS9 considered appropriate given area's good public transport accessibility and evidence of under-used sites, as explained in supporting text.
•	Worsened air quality.	 Addressed by references in Policy DS9 'Brislington' to development including new sustainable travel routes in this location. Issue also addressed by Local Plan Publication Version policies HW1 'Pollution control and water quality' and HW2 'Air quality'.
•	Need for new infrastructure to accompany development, including improved pedestrian and cycle routes and green spaces.	 Policy DS9 'Brislington' makes reference to development including new sustainable travel routes in this location and green infrastructure and public realm enhancements.

Proposal CDS 9: New neighbourhood – Bath Road, Brislington

Table 14 - main issues raised on Proposal CDS 9: New neighbourhood – Bath Road, Brislington and how they were addressed in the Local Plan

Main issues raised		How they were addressed
	e boundary should be ger.	 Boundary considered appropriate and maintained for Local Plan Publication Version Policy DS12 'New neighbourhood – Bath Road, Brislington'.
• Los	ss of green belt land.	 Rationale explained in draft proposal, which is maintained for Publication Version Policy DS12.

M	ain issues raised	How they were addressed
•	Additional pressure on transport and infrastructure, worsening congestion and air quality issues.	Addressed by Policy DS12's reference to new development being supported by appropriate local and strategic transport infrastructure.
•	Objection to tall buildings.	Tall buildings not specifically referred to in draft policy and this is maintained in Publication Version Policy DS12. Any tall building proposals will be considered with reference to Policy DC2 'Tall buildings' and all other relevant policies.
•	Protect heritage value of old mine workings in locality.	Policy DS12 makes reference to development being subject to the preparation of a detailed development framework or master plan prepared in consultation with the local community and stakeholders. Taking into account any local heritage issues can be part of this masterplanning work. Also likely to be relevant will be policies from the Local Plan Publication Version's 'Design and conservation' chapter, including Policy CHE1 'Conservation and the historic environment'.
•	Justification questioned for 40% of new homes to be affordable.	 Policy DS12 expects development to provide an appropriate level of affordable housing (35% of new homes). This is supported by Publication Version Policy AH1 'Affordable housing provision'.

Hengrove and Knowle West

Table 15 - main issues raised on Hengrove and Knowle West and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Important that Hengrove Park, Hartcliffe campus and Whitchurch Park Spatial Framework: Retains wildlife. 	 Local Plan Publication Version explains that Hengrove and Whitchurch Park Neighbourhood Plan came into force in 2019 and this will steer approach to development in this location.

Main issues raised		How they were addressed
0	Ensures carbon neutral development.	
0	Protects open space.	
0	Has regard to Whitchurch Village Neighbourhood Plan.	
0	Includes a rapid transit link to Whitchurch Park.	
0	Provided sufficient employment opportunities.	
Knowle West:		Housing allocations in Knowle West are set
0	objection to any additional housing on the Slopes area.	out in Local Plan Publication Version Policy DA1 'Proposed development allocations' with detail and rationale provided in supporting annex.

Proposal CDS 10: Revised Green Belt boundary at south west Bristol

Table 16 - main issues raised on Proposal CDS 10: Revised Green Belt boundary at south west Bristol and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Objection to principle of Green Belt release. Exhaust Brownfield sites first. Potential for large cross- boundary urban sprawl into North Somerset. Likelihood of increased traffic congestion, parking issues and pressure on community infrastructure and services. 	The draft proposals in 2018 and 2019 have been amended for the Local Plan Publication Version following consultation in 2022. Land at Yew Tree Farm is no longer proposed as a development allocation. The approach to remove from the Green Belt land at Ashton Vale and adjacent to Elsbert Drive and identify them as development allocations has been maintained. Local Plan Publication Version policies DS10 'The Green Belt' and DS11 'Development allocations — southwest Bristol' refer. The approach is considered appropriate to ensure a sufficient number and range of development sites is available to meet housing need.

Ma	ain issues raised	How they were addressed
•	Need for affordable housing and concern it will not be delivered. Impact of development on wildlife corridors and views to the city.	Policy DS11 explains that land at Ashton Vale has now received planning permission (ref. 21/03166/P) for around 500 homes. It also states that development adjacent to Elsbert Drive should be in accordance with a detailed cross-boundary development framework or
•	Loss of high value Green Belt open spaces for amenity including recreation and wellbeing.	master plan prepared in consultation with the local community.
•	Need to ensure sustainable long term employment opportunities area.	
•	Concerns about worsening flood risk.	
•	Negative impact on Yew Tree farm.	
•	Wessex Water thought that, if the proposal was to proceed, improvements could be facilitated to Colliter's Brook.	
•	North Somerset Council commented that:	
	 Any proposed change to Green Belt should be fully justified. 	
	 All options for meeting housing need should be examined prior to proposing changes. 	
	 Proposing Green Belt boundary change to correspond with new link road may not meet NPPF 	

Main issues raised	How they were addressed
para. 85 requirements.	
 Bedminster Down: This extensive tract of land may not meet criteria for Local Green Space designation. An alternative finger of Green Belt land stretching into Bristol from North Somerset suggested as improving recreational opportunities and enhancing ridge landscape value. 	
 Ashton Vale: to avoid merger with Long Ashton important to consider that land north of Ashton Vale Town Green is adjacent to an Area of Separation designated in Long Ashton Neighbourhood Plan. 	
 Consideration should be given to safeguarding a new access road into rear of Ashton Vale Industrial Estate. This is to reflect the MetroWest Portishead rail line re-opening proposal. 	

Main issues raised	How they were addressed
Network Rail advised consideration of a new industrial estate access road, plus how existing freight operations will be maintained.	

North Bristol

Proposal CDS 11: Lockleaze

Table 17 - main issues raised on Proposal CDS 11: Lockleaze and how they were addressed in the Local Plan

Ma	ain issues raised	How they were addressed
•	Adequate infrastructure required such as school and sustainable transport improvements. Links to University of West of England campus needed, particularly through improved active travel infrastructure.	Since the 2018 consultation Lockleaze has seen the opening in 2021 of a new £25m 400-pupil secondary school. Work on the Lockleaze Sustainable Transport Infrastructure project is also underway. A new accessible all-weather path connecting Lockleaze to Stoke Park was opened in 2022 and work is nearing completion on major works in Muller Road to facilitate a bus lane and cycle and walking infrastructure
•	Stoke Park should be referred to as a gateway to the city and important green space.	improvements. Local Plan Publication Version Policy DS13 'Lockleaze' builds on this with its reference to development including new and improved walking and cycling routes to connect to surrounding neighbourhoods, public transport facilities and the wider cycle network.

Proposal CDS 12: Central Southmead and Southmead Road

Table 18 - main issues raised on Proposal CDS 12: Central Southmead and Southmead Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Policy should ensure development aligns with Southmead Community Plan and priorities of the Southmead Development Trust. 	The draft proposal has been amended for the Local Plan Publication Version as Policy DS14 'Central Southmead' no longer includes the Southmead Road area. The Publication Version policy reflects Southmead Community Plan's aspirations with its references to development

Main issues raised	How they were addressed
Emphasis should also be on open space, public realm and active and public transport improvements.	providing an appropriate housing mix and improved community facilities.

Lawrence Weston

Table 19 - main issues raised on Lawrence Weston and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Protect habitats in and around Lawrence Western Moor. Improve interrelationship between residential and surrounding industrial uses and motorway, including mitigating harmful impacts. 	Local Plan Publication Version explains that the Lawrence Weston Neighbourhood Plan will continue to steer the approach to development in this location.

Proposal CDS 13: Avonmouth Village – Protecting the living conditions of residents

Table 20 - main issues raised on Proposal CDS 13: Avonmouth Village – Protecting the living conditions of residents and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Bristol Port Company considered the proposal lacks evidence, fails to recognise existing pollution control regimes, would be ineffective, disproportionate and interfere with the statutory undertakings of the port. Wessex Water considered that any proposed mitigation measures must not inhibit its ability to effectively operate the Avonmouth sewage treatment works. 	Draft proposal not taken forward. Local Plan Publication Version contains a number of policies which will ensure potential harmful impacts of development proposals are adequately considered and addressed. These include policies HW1 'Pollution control and water quality', HW2 'Air quality', HW1A 'Noise' and HW1B 'Contaminated land'. Issue raised around houses of multiple occupation will be addressed by Publication Version Policy H6 'Houses in multiple occupation and other shared housing'.

Ма	in issues raised	How they were addressed
•	Consider extending area of protection and mitigation to cover Lawrence Weston and Shirehampton.	
•	Concern about numbers of Houses of Multiple Occupation and resulting impact on family homes.	

Delivering new homes through urban living

Proposal ULH 1: Provision of new and affordable homes

Table 21 - main issues raised on Proposal ULH 1: Provision of new and affordable homes and how they were addressed in the Local Plan

Ma	ain issues raised	How they were addressed
•	Clarity sought on whether housing figures include student housing need.	 Student housing need addressed by Local Plan Publication Version Policy H7 'Managing the development of purpose-built student accommodation'.
•	More emphasis needed on providing small family / younger professional homes and community-led housing.	 Local Plan approach is to ensure new development provides an appropriate mix of housing types; Publication Version Policy H4 'Housing type and mix' refers.
•	Include requirement for Private Rented Accommodation within overall housing number.	 Approach to overall housing target set out in Publication Version Policy H1 'Delivery of new homes – Bristol's housing requirement'. Private Rented Accommodation requirement not considered appropriate.
•	Too much emphasis on meeting housing targets over sustainable development.	 Approach consistent with national planning policy.
•	Housing target number does not meet objectively assessed need.	 Target set out in Local Plan Publication Version Policy H1 'Delivery of new homes – Bristol's housing requirement' considered appropriate and supported by relevant evidence.

Main issues raised		Но	How they were addressed		
•	Expres minim	s targets as a um.	•	Target is expressed as a minimum.	
•	encou redeve and ur	tion to approach raging elopment of vacant nder used office or rial land:	•	Approach is explained in introductory text to Publication Version's 'Housing' chapter. It is considered appropriate and supported by national planning policy. Policies to encourage sustainable economic growth set	
	0	Could harm economic and sustainable development;		out in the Publication Version's 'Economy and inclusive growth' chapter.	
	0	Underused appearance of industrial land may not reflect actual importance for successful operational use of the site.			
	0	Businesses struggling to secure long term leases on industrial areas, with short-term leases unviable.			
	0	Concerns about incompatibility of introducing residential uses into industrial areas, and consequent impacts on sustaining industrial uses.			
	0	No consideration of impact of losing employment sites.			
	0	Concern that development proposals on employment sites outside of key locations will no			

Main issues raised	How they were addressed
longer have to demonstrate an absence of a demand for employment uses.	
 Highways England sought specific reference to requiring necessary infrastructure to deliver the new homes proposed. 	Local Plan Publication Version Policy IDC1 'Development contributions and CIL' will be used to ensure new development is supported by the provision of infrastructure, services and facilities.

Proposal ULH 2: Affordable housing

Table 22 - main issues raised on Proposal ULH 2: Affordable housing and how they were addressed in the Local Plan

Main issues raised		How they were addressed	
•	Clarify definition of affordable housing. Social housing needed for people on low incomes not just a general definition of 'affordable'.	Definition provided in Local Plan Publication Version Policy AH1 'Affordable housing provision' which reflects the NPPF.	
•	Affordable housing percentage target considered to be:	 Appropriate percentage target set out in Publication Version Policy AH1 'Affordable housing provision'. 	
	o Too low:		
	Higher Percentage sought, e.g. 60%.		
	o Too high:		
	 Inconsistent with national policy and lacking justification. 		
•	More flexible percentage targets required for different parts of the city.	 Such an approach provided for in Publication Version Policy AH1, which is based on latest assessments of development viability for 	

Main issues raised	How they were addressed
	each location referred to in the policy.
 Proposed site size threshold of 5 dwellings considered to be: 	 Site size threshold set out in Local Plan Publication Version Policy AH1 consistent with NPPF.
 Too low. Counter- productive for small developments / small builders. Suggest minimum should be 10 units; 	
 Too high. Should be reduced to 4 units. 	
Concern about links with Joint Spatial Plan policy as latter has not been viability tested.	Joint Spatial Plan withdrawn in 2020.
Viability assessment needed, including in combination with other policies.	Local Plan Publication Version supported by viability assessment.

Proposal ULH 3: Urban living – making efficient use of land to meet our needs

Table 23 - main issues raised on Proposal ULH 3: Urban living – making efficient use of land to meet our needs and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
Support higher density development approach but not through tall buildings.	 Tall buildings can contribute to helping Bristol accommodate new development. Local Plan Publication Version Policy DC2 'Tall buildings' sets out criteria to ensure important planning considerations are appropriately considered in determining tall building applications. 	
 As well as higher density development, approach should also focus on delivering: Sustainable active travel; 	 Issues addressed in various Local Plan Publication Version policies including: Policy T1 'Development and transport policies'; Policy DPM1 'Delivering well-designed, inclusive places'; Policy SSE1 'Supporting Bristol's Centres - network and hierarchy'; and Policy DC1 'Liveability in residential 	

Main issues raised	How they were addressed
o Good design;	development including space standards and
 Mix of uses not just residential; 	private outdoor space'.
 Regeneration of neighbourhoods across the city; 	
 Liveable indoor and outdoor spaces. 	
More clarity sought on:	Clarifications sought:
 What represents 'development which fails to make efficient use of land'; 	 Addressed in explanatory text to Local Plan Publication Version Policy UL1 'Effective and efficient use of land'.
 Assessment of infrastructure impacts resulting from proposal (e.g. on road network, parking, accessibility, child safety, access to open space). 	 Addressed by Local Plan Publication Version Policy T3A 'Transport development management'. This requires a Transport Assessment / Statement to be submitted alongside a planning application where development is likely to have a significant traffic impact.
Bristol Avon Catchment Partnership thought reference to creating liveable environment should specify one which is adaptable to climate change.	Addressed in Local Plan Publication Version Policy NZC4 'Adaptation to a changing climate'.
Historic England sought addition to policy wording so that new development is expected to reflect Bristol's Urban Character 'and the significance of its heritage assets'.	Addressed in Local Plan Publication Version policies DPM1 'Delivering well-designed, inclusive places' and CHE1 'Conservation and the historic environment'.

Proposal ULH 4: Tall buildings

Table 24 - main issues raised on Proposal ULH 4: Tall buildings and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Lack of detail on how developments will be determined.	 Addressed in Local Plan Publication Version Policy DC2 'Tall buildings'.
Over-reliance on Urban Living supplementary planning document – detail and viability implications should be addressed in Local Plan.	 Considered appropriate for detail on application of Local Plan policy to be provided by Supplementary Planning Document. Local Plan supported by viability assessment.
Tall buildings out of character in Bristol.	 Policy DC2 sets out criteria to ensure important planning considerations such as character are appropriately considered in determining tall building applications.
 Negative impacts not adequately understood or assessed. 	 Policy DC2 sets out criteria to ensure potential impacts are appropriately considered in determining tall building applications.
Policy should include specific locations appropriate for tall buildings, e.g. central and accessible locations such as around Temple Meads.	Policy DC2 provides locational guidance with focus on areas identified as suitable for most intensive forms of development or as identified in policies for specified regeneration areas.

Proposal ULH 5: Fire safety

Table 25 - main issues raised on Proposal ULH 5: Fire safety and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
 Proposal not a planning matter. Should be dealt with through Building Regulations regime. 	 Proposal not taken forward in subsequent Local Plan Review consultations. 	

Managing student housing and University development

Proposal ULH 6: Specialist student accommodation

Table 26 - main issues raised on Proposal ULH 6: Specialist student accommodation and how they were addressed in the Local Plan

Main issues raised		Но	How they were addressed	
•	More restrictive approach needed as any increase in student numbers considered unsustainable.	•	Local Plan Publication Version Policy H7 'Managing the development of purpose-built student accommodation' provides an appropriate approach. It seeks to ensure a sustainable increase in purpose-built student accommodation is achieved by ensuring schemes come forward in appropriate locations. This will maintain a balance between the needs of the wider community and delivering high quality and well-managed accommodation.	
•	As well as meeting increase in student numbers, approach should address existing shortfall of purpose-built student housing, as evidenced by reliance on Houses in Multiple Occupation.	•	Publication Version Policy H7 considered to adequately address student housing need. Supporting text to policy sets out the identified need for student bed spaces.	
	Proposed locations for specialist student accommodation: Objection as it constrains development of equally appropriate sites outside preferred areas. Concern about expansion of accommodation in University of Bristol precinct, Clifton campus and Stoke Bishop campus on grounds of amenity impacts such as character and car parking.	•	 Publication Version Policy H7 allows for student accommodation in locations other than those identified, subject to proposals avoiding specified impacts and meeting other objectives described in policy and supporting text. Publication Version Policy H7 seeks to ensure a sustainable expansion is achieved by allowing for some additional accommodation up to specified bed space limits within the University of Bristol precinct and at other residential sites. Proposals at Clifton and Stoke Bishop campuses will be subject to a Masterplan and should not give rise to significant additional demand for on-street parking. 	
•	Affordable Student Housing provision proposal:	•	Affordable Student Housing provision proposal:	

Main issues raised			How they were addressed		
	0	Definition unclear;		0	Definition provided in Publication Version Policy H7.
	0	Lack of evidence e.g. justifying 'identified need';		0	Justification provided in Publication Version Policy H7.
	0	Contrary to NPPF para. 65.		0	NPPF para. 65 is not relevant to the provision of affordable student housing.
•		a 1: General Purpose able Housing:	•	Criteri Housir	a 1: General Purpose Affordable ng:
	0	Unreasonable as does not accord with national policy.		0	Approach amended for Publication Version Policy H7. A contribution towards general purpose affordable housing is now expected only for
	0	Unclear how it would be implemented (i.e. a 35% affordable housing requirement cannot be applied to student units in the same way as standard housing).			schemes which include self-containe accommodation. Such units will be considered as dwellings for the purposes of calculating any affordable housing contribution under Publication Version Policy AH1 'Affordable housing provision'.
•	Criteri	a 2: Harmful Impacts:	•	• Criteria 2: Harmful Impacts:	
	0	Lack of clarity on meaning of 'undesirable concentration' and 'harmful impacts'.		0	Clarification and more detail provided in Publication Version Policy H7.
•	Criteria 3: Mix of uses and Large Scale proposals:		•	Criteri propos	a 3: Mix of uses and Large Scale sals:
	0	Concern it would not support greater quality of life. Reduce proportion to 20% student floorspace. Clarity needed on 'substantial proportion'.		0	Approach amended for Publication Version Policy H7. Purpose-built student accommodation as part of mixed-use developments now sought only where feasible and appropriate in locations other than those specified for student accommodation.

Main issues raised	How they were addressed
 Viability testing needed as could makes purpose-built private sector student accommodation unviable. 	
Criteria 4: Active Frontages:	Criteria 4: Active Frontages:
 proposal should be informed by viability testing. 	 Approach considered appropriate and maintained for Publication Version Policy H7. Flexibility provided with policy's reference to active frontage provision wherever possible and appropriate.

Proposal ULH 7: Housing in Multiple Occupation

Table 27 - main issues raised on Proposal ULH 7: Housing in Multiple Occupation and how they were addressed in the Local Plan

Main issues raised		es raised	How they were addressed	
•	Clarifi	cation sought on:	Clarifications sought:	
	0	Meaning of 'harmful impacts and / or concentrations'; How proportion of HMOs within a 'given area' and how 'housing stock' will be defined; The approach for areas which already	 Addressed in explanatory text to Local Plan Publication Version Policy H6 'Houses in multiple occupation and other shared housing', supported by reference to 'Managing the development of houses in multiple occupation' Supplementary Planning Document. Percentage threshold considered reasonable and appropriate for reasons set out in explanatory text to policy. 	
	0	exceed the 10% threshold; Justification for the		
 Approach to HMOs undermines their value, particularly in providing accommodation for young 		mines their value, ularly in providing	 Positive contribution that HMOs can make to choice and affordability of housing is reflected in introductory text to Publication Version Policy H6. Policy seeks to ensure 	

Main issues raised	How they were addressed	
people starting their	appropriate balance between provision of	
careers.	HMOs and avoiding harmful impacts.	

Proposal ULH 8: Older people's housing

Table 28 - main issues raised on Proposal ULH 8: Older people's housing and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
Ensure sufficient number of sites are allocated and located where older people want to live.	 Approach of Local Plan Publication Version Policy H8 'Older people's and other specialised needs housing' is to encourage a range of older people's and specialised needs housing options. Policy also provides guidance on appropriate location of schemes. 	
Lack of justification for requirement for older people's housing homes to be delivered as a requirement on market housing sites.	Draft proposal not taken forward in Local Plan Publication Version Policy H8.	
Needs to clearly define what constitutes older persons' accommodation. Affordable housing should only be sought from Use Class C3 housing rather than C2 where on-site, specialist care is provided.	Clarification provided in supporting text to Publication Version Policy H8.	

Proposal ULH 9: Accessible homes

Table 29 - main issues raised on Proposal ULH 9: Accessible homes and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
Clarify definition of 'larger schemes'.	Clarified in Local Plan Publication Version Policy H9 'Accessible homes' that this relates to proposals for 10 or more dwellings.	
Should reference accessible housing to be located on the most accessible part of	 Addressed in Publication Version Policy H9 with its reference to all new build housing being designed to be accessible and 	

Main issues raised	How they were addressed	
any site.	adaptable in compliance with Building Regulations M4(2) Category 2: Accessible and adaptable dwellings. The explanatory text to the policy considers site topography.	
 Proposal not justified by evidence nor reflects national planning guidance. 	 Justification provided in introductory text to Publication Version Policy H9. 	
Viability of proposal needs testing.	Local Plan Publication Version supported by viability assessment.	
Proposal for 10% of new homes in larger schemes to be wheelchair accessible:	 Approach of draft proposal maintained for Publication Version Policy H9. This requires at least 10% of new build housing in 	
 Should be flexibly applied on a site-by- site basis. 	proposals of 10 dwellings or more designed to be wheelchair accessible. This is considered appropriate for reasons set out in introductory text.	
o Should be 20%.	introductory text.	

Proposal ULH 10: Self-build accommodation

Table 30 - main issues raised on Proposal ULH 10: Self-build accommodation and how they were addressed in the Local Plan

Main issues raised		es raised	How they were addressed	
•	 Define self-build and custom build. 		Definitions provided in Local Plan Publication Version Policy H5: 'Self-build and community-led housing'.	
•	Should include Community- Led Housing.		 Approach amended so that Publication Version Policy H5 also includes provisions for community-led housing. 	
•	Overall housing target should include percentage to be delivered through self-build housing:		 Approach has evolved from 2018. Publication Version Policy H5 uses a range of policy mechanisms to help meet identified demand including: 	
	0	Support received with 20% suggested. Objection also received.	 encouraging provision of new homes through self-build, custom housebuilding and other community-led approaches; allocating three sites for this form of housing; 	

Main issues raised	How they were addressed
	 requiring at least 5% of homes on two housing allocation sites on former Green Belt land to be for this form of housing; and
	 seeking a proportion of this form of housing as part of the overall development of identified growth and regeneration areas.
 Further consideration needed about interaction of self-build allocations as part of larger housing sites. 	 Supporting text to Publication Version Policy H5 provides more guidance on the provision of self-build housing as part of larger housing sites.
Lack of evidence to justify policy, such as no viability assessment.	 Justification for approach provided in introductory text to Publication Version Policy H5. Local Plan Publication Version supported by viability assessment.

Economy and employment land

Table 31 - main issues raised on Economy and employment land and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Under-allocation of employment land, including lack of suitable office space, and imbalance between employment land and housing need.	Strategic policy approach to the scale and location of new workspace to be delivered over the plan period set out in Local Plan Publication Version Policy E2 'Economic development land strategy'.
Phrase 'consolidate our economic strengths' does not demonstrate progrowth approach.	Local Plan Publication Version Policy E2 sets out aim to secure sustainable and inclusive economic growth through development of new workspace and retention of core industrial land.
Historic England noted no reference to visitor/tourism economy.	 Reference included in 'Economy and inclusive growth' chapter of Local Plan Publication Version.

Avonmouth Industrial Areas and Bristol Port

Proposal EC 1: Avonmouth Industrial Areas

Table 32 - main issues raised on Proposal EC 1: Avonmouth Industrial Areas and how they were addressed in the Local Plan

M	ain issues raised	How they were addressed
•	Access 18:	• Access 18:
 Greenfield land suggested as potential mixed commercial and industrial use. Any expansion of St. Modwen/Access 18 	 Site allocation included in 2019 consultation document for development of industrial and distribution uses on land at Kings Weston Lane, south of Access 18 (Policy E4: Avonmouth Industrial Area and Bristol Port). 	
	would need improved transport links and access.	 Planning permission has been granted for mixed commercial/industrial development on land at the proposed site allocation at Kings Weston Lane, south of Access 18.
•	Limited reference to nationally significant activities at Bristol Port.	 Addressed in Local Plan Publication Version Policy E4 'Avonmouth Industrial Area and Bristol Port'.
•	Historic England noted lack of reference to importance of archaeology in low-lying Avonmouth Levels.	Addressed in Local Plan Publication Version Policy E4.
•	Environment Agency sought retention of existing pollution policies and updating of evidence base.	Pollution policies contained in 'Health, wellbeing and food sustainability' chapter of Local Plan Publication Version. Flood risk policies within 'Net zero and climate' chapter, informed by appropriate evidence.
•	Highways England thought implications for M5 should be considered, particularly at Junction 18 taking account of new M49 junction.	Draft policy approach informed by transport evidence prepared for the Local Plan Review.

The city's core industrial estates

Proposal EC 2: Industry and Distribution Areas

Table 33 - main issues raised on Proposal EC 2: Industry and Distribution Areas and how they were addressed in the Local Plan

Main issues raised	How they were addressed
More flexible approach needed to take advantage of mixed-use brownfield development opportunities as per urban living aim.	Approach considered appropriate for reasons set out in introductory text to draft policy.
 Approach favours hi-tech industries over low-tech manufacturing sector. 	 Industry and Distribution Areas contain wide variety of existing occupiers and policy approach supports this diversity.
Does not demonstrate how industrial growth will be achieved as Industry and Distribution Areas require investment and safeguarding to meet future needs.	Local Plan Publication Version Policy E2 'Economic development land strategy' provides the strategic policy approach to securing sustainable and inclusive economic growth through development of new workspace and retention of core industrial land. Publication Version Policy E5 'Industry and Distribution Areas' identifies the city's core industrial land and reserves it for continued use.
Article 4 Directions needed to protect key office sites from conversion to residential uses.	Lack of evidence to suggest Article 4 Directions are appropriate. Monitoring of office floorspace gains and losses is on-going and will inform the review of the Local Plan.
Need to support artist and creative spaces.	 Provision of such spaces supported by various policies in Local Plan Publication Version, including policies E2 'Economic development land strategy', E5 'Industry and Distribution Areas', E6 'Affordable workspace' and SSE5 'Temporary uses in centres'.
 Following sites considered inappropriate for protection under EC2: Netham Road / Blackswarth Road, Fishponds Trading Estate, Hawkfield Business 	Local Plan Publication Version Policy EC2 identifies these sites as Industry and Distribution Areas due to their strategic economic importance and suitability for industrial and warehousing premises which could accommodate a wide range of sectors.

Main issues raised	How they were addressed
Park, and New Gatton Road.	
Remove Principal Industrial and Warehousing Area designation from Brabazon Hanger.	Brabazon Hanger not identified as an Industry and Distribution Area.

New forms of work space

Proposal EC 3: New forms of work space

Table 34 - main issues raised on Proposal EC 3: New forms of work space and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Inappropriate to require development of former industrial / distribution land to provide new workspace.	 Clarification made to Local Plan Publication Version Policy E6A 'New workspace within mixed use development'. This makes clear that providing new workspace within mixed use development does not apply to areas covered by Policies E4 'Avonmouth Industrial Area and Bristol Port' and E5 'Industry and Distribution Areas' or to other locations to which specific policy provisions apply.
 Request provision is made for sustainability industry and studio, hobby and workshop space. 	 This comment is considered to be adequately addressed in Local Plan Publication Version Policy E6A, for example with reference to workspace provided or retained being suitable for a wide range of sectors and types of premises.

Digital Connectivity

Proposal EC 4: Digital connectivity and inclusion

Table 35 - main issues raised on Proposal EC 4: Digital connectivity and inclusion and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Objection to imposition of	 Written Ministerial Statement refers to
standards higher than	changes made to system by which
existing building standards	technicalities of design and construction are
and contrary to Written	set and does not refer to building standards
Ministerial Statement.	for digital connectivity, thus does not apply

Main issues raised	How they were addressed
	to Local Plan Publication Version Policy E8 'Digital connectivity and inclusion'.

Health and well being

Table 36 - main issues raised on Health and well being and how they were addressed in the Local Plan

Main issue	es raised	How they were addressed
• Greate on:	er emphasis sought	Addressed in Local Plan Publication Version Policy HW2B 'Health and development'.
Bristol Partne should health ensurii detern addres and co Develo should assess and op health comm identif reduce throug	green amenity spaces; nurturing nature; sustainable/active travel; child friendly spaces and play. Avon Catchment rship thought focus be on reducing inequalities by ng wider ninants of health are sed in integrated rordinated way. Spment proposals be expected to potential impacts operation of unities, in order to y mitigation and inequalities, e.g. th use of Health transpaces.	This seeks to ensure development contributes to reducing causes of ill health, improves health and reduces health inequalities by addressing adverse health impacts, providing a healthy living environment, promoting and enabling healthy lifestyles and providing good access to health facilities and services. Health Impact Assessments will be required to accompany large development proposals or where a significant impact on health and wellbeing is likely. These will identify any negative impacts and mitigation measures. The council's practice note 'Planning a healthier Bristol: Assessing the health impacts of development' (2013) provides additional guidance for assessing the health impacts of development. The council intends to update this practice note.

Air quality

Proposal HW 1: New development to contribute to delivering the council's Air Quality Action Plan

Table 37 - main issues raised on Proposal HW 1: New development to contribute to delivering the council's Air Quality Action Plan and how they were addressed in the Local Plan

Main issues raised	How they were addressed
More detail required on financial contributions mechanism and projects it would fund.	 Approach to planning obligations addressed in Local Plan Publication Version Policy IDC1 'Development contributions and CIL' and Planning Obligations supplementary planning document.
Lack of justification and evidence that proposal would not affect development viability and delivery.	Local Plan Publication Version supported by viability assessment.
Effectiveness of proposal questioned as relies on offsite mitigation.	 Local Plan Publication Version Policy HW2 'Air quality' seeks the provision of both on- and off-site mitigation measures where necessary. The acceptability of any off-site provision will be assessed according to the policies of the local plan on a case by case basis.

Proposal HW 2: Controlling potentially polluting development

Table 38 - main issues raised on Proposal HW 2: Controlling potentially polluting development and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Off-site solutions may not help as pollution impacts are localised.	Local Plan Publication Version Policy HW2 'Air quality' seeks provision of both on- and off-site mitigation measures where necessary. The acceptability of any off-site provision will be assessed according to the policies of the local plan on a case by case basis.

New protection for open space

Table 39 - main issues raised on New protection for open space and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Greater clarity sought on which sites would be protected.	Detail provided in 2019 'New Protection for Open Space – Consultation' document.
Concern that approach would result in overall reduction in green space and levels of protection.	 Approach considered appropriate for reasons set out in document.
Bristol Avon Catchment Partnership and Wessex Water: Requested clarity on criteria to be used to assess whether land may no longer be required as open space. Sought an approach which recognises increasing importance of open space to mitigate climate change impacts.	 Bristol Avon Catchment Partnership and Wessex Water comments: Information on approach to open space designation provided in 2019 'New Protection for Open Space – Consultation' document. Importance of open space in climate mitigation referenced in 2018 document. Approach maintained for Local Plan Publication Version's 'Biodiversity and Green Infrastructure' chapter.
 Environment Agency considered that: Proposals could be more aspirational with a target to increase quantum of open space. Insufficient reference had been given to value of watercourses and wetlands, and their enhancement. 	 Environment Agency comments: 2018 consultation identified that a fifth of the city's land area is given over to various forms of open space and that this overall proportion would be maintained in the Local Plan Review. This is the approach of the Local Plan Publication Version and is considered appropriate given the other aims and objectives of the plan, particularly around meeting the city's strategic development needs. Proposals were developed for subsequent consultation documents. Issue covered in Local Plan Publication Version's 'Biodiversity and Green Infrastructure' chapter;

Main issues raised		How they	were addressed
			for example, Policy BG5 'Biodiversity and access to Bristol's waterways'.
· -	Sport England considered		England comments:
that:	Draft proposal did not adequately protect recreation and sport spaces including playing pitches.	0	Approach considered appropriate for reasons set out in consultation document. Proposals were developed in subsequent consultations. Issue addressed in Local Plan Publication Version's 'Biodiversity and Green Infrastructure' chapter.
0	Reference be made to their Active Design principles.		•
0	Existing sports facilities (outdoor) should be protected.		will contribute to providing healthy lifestyles. Policy will be implemented with guidance in council's practice note 'Planning a healthier Bristol: assessing the health impacts of
0	Community use of education sites should be		development'. This includes reference to Sport England's Active Design principles.
	promoted.	0	Issue covered by Local Plan Publication Version Policy CF2 'Retention of community facilities'.
		0	Local Plan Publication Version Policy CF1 'Provision of community facilities' expects community facilities to be accessible and open to all members of the community. Educational establishments will consider whether community use of their sites is appropriate.

Proposal HW 3: Specially Protected Local Green Space

Table 40 - main issues raised on Proposal HW 3: Specially Protected Local Green Space and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
Environment Agency concerned that criteria for	Approach considered appropriate, reflecting the strong protections afforded to Local	
Specially Protected Local	Green Spaces by national planning policy.	

Main issues raised	How they were addressed
Green Space designation excludes Local Wildlife Sites, Sites of Nature Conservation Interest or the value of watercourses.	
A number of sites were submitted for designation as Specially Protected Local Green Space under HW3.	Sites assessed and results set out in 2019 'New Protection for Open Space – Consultation' document.
Lack of clarity on differences between definitions and protections for sites subject to Proposal HW 3 'Specially Protected Local Green Space' and Proposal HW 4 'Reserved Open Space' and how they would be assessed for designation.	Detail provided in 2019 'New Protection for Open Space – Consultation' document.

Proposal HW 4: Reserved Open Space

Table 41 - main issues raised on Proposal HW 4: Reserved Open Space and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Lack of clarity on differences between definitions and protections for sites subject to Proposal HW 3 'Specially Protected Local Green Space' and Proposal HW 4 'Reserved Open Space' and how they would be assessed for designation.	Detail provided in 2019 'New Protection for Open Space – Consultation' document.

Takeaways

Proposal HW 5: Health impact of takeaways

Table 42 - main issues raised on Proposal HW 5: Health impact of takeaways and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Increase distance criteria further.	Distance criteria approach maintained for Local Plan Publication Version Policy HW3 'Takeaways'. Supporting text to policy identifies there may be cases where a proposed takeaway located beyond 400m may not be acceptable due to other local factors which would result in the outlet being likely to have a harmful influence on children's behaviour.
Lack of evidence to justify proposed approach.	 Support for approach in national planning policy and guidance as well as local health- related objectives.
Proposal may have potential harmful impact on centre viability.	 Approach considered to be appropriate, responding to national planning policy and local health-related objectives.
Concern focus on Use Class A5 uses may not capture unhealthy non-A5 uses.	 Local Plan Publication Version Policy HW3 'Takeaways' amended so that it is also applicable to proposals for mixed Use Class A3 and A5 schemes.

Resilience

Climate change

Proposal RES 1: Meeting more of development's energy needs sustainably

Table 43 - main issues raised on Proposal RES 1: Meeting more of development's energy needs sustainably and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
Should be more supportive of renewable energy generation including wind.	Local Plan Publication Version Policy NZC5 'Renewable energy and energy efficiency' sets out a supportive stance for renewable energy development across the city and of all scales. The policy specifically identifies Avonmouth and its environs as being particularly well suited to such development, including wind.	
 Lack of viability-testing and evidence to justify approach. 	Local Plan supported by viability assessment.	
SSE Generation Limited thought proposal should	The council supports the repowering of existing renewable energy generation,	

Main issues raised	How they were addressed
consider applications for repowering existing plant, wind farm extensions and remove time-limit conditions from planning permissions, plus support new gas development.	including wind turbines. These would be addressed through Policy NZC5 where planning permission is required. The council does not support the provision of new gas fired energy infrastructure in the city as part of the transition towards net zero.

Proposal RES 2: Updating the approach to heating systems

Table 44 - main issues raised on Proposal RES 2: Updating the approach to heating systems and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Lack of detailed wording.	The suite of NZC policies has been extensively developed since the 2018 consultation. They are highly detailed policies now which set out specific requirements relating to heating systems. Publication Version Policy NZC2 'Net zero carbon development – operational carbon' is the most relevant policy for this planning issue.
Need to reference renewable sources.	The council's proposed heat hierarchy prioritises connections to the city's expanding heat network. This network is low carbon and will undergo further transition away from fossil fuel powered heating by 2030. Where connections to the heat network are not practicable, communal or individual renewable heating which is fossil fuel free will be expected to be installed.

Proposal RES 3: Supporting new sustainable design standards

Table 45 - main issues raised on Proposal RES 3: Supporting new sustainable design standards and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Reference could be made to Building with Nature standards and use of	The council has prepared a suite of biodiversity and green infrastructure policies to address the ecological emergency. Local Plan Publication Policy BG1 'Green infrastructure and biodiversity in new

Main issues raised	How they were addressed
recycled content building products.	development' requires major development to achieve specific standards for urban greening, and includes Building with Nature as an optional standard.

Proposal RES 4: Stronger policies for adapting to climate change

Table 46 - main issues raised on Proposal RES 4: Stronger policies for adapting to climate change and how they were addressed in the Local Plan

Main issues raised		es raised	How they were addressed
•	More	emphasis needed on: Tree planting; Adaptation of existing development;	The new local plan includes a policy which addresses tree replacement using a standard based on the age/dimension of trees lost. This standard is an improvement on existing local plan policy.
	0	SUDs; Identifying renewable energy zones.	The suite of NZC policies also recognises the role of reusing existing buildings wherever possible, including due to their embodied carbon. Although predominantly concerned with new development, it also includes policy provision that supports the adaptation of development to a changing climate, with regard to issues such as overheating and more extreme weather.
			Local Plan Publication Version Policy NZC5 'Renewable energy and energy efficiency' identifies Avonmouth as an area particularly well suited to renewable energy generation, but is also supportive of proposals across the city.
•		standing impacts on opment viability d.	Local Plan supported by viability assessment.

Food Systems

Table 47 - main issues raised on Food Systems and how they were addressed in the Local Plan

Main issues raised		How they were addressed
•	Stronger emphasis needed on:	The new local plan contains a suite of proposed policies that address food sustainability.

Main issues raised	How they were addressed	
 Protecting allotments, food growing sites, best and most versatile soil, and the St Philip's Marsh Wholesale Market. Food growing should be a strategic objective. 	Publication Version Policies FS1-2 aim to increase the provision of food growing space, both allotments and in new development. Policy FS3 specifically calls for the protection of existing food growing uses in the city, including allotments which are already afforded significant protections in statute.	

Proposal RES 5: Stapleton Allotments and Holdings

Table 48 - main issues raised on Proposal RES 5: Stapleton Allotments and Holdings and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
All allotments should receive similar protection.	All allotments are subject to strict statutory protections. The new local plan builds on this with Publication Version Policy FS3 'The protection of existing food growing enterprises and allotments' which protects food growing uses in the city, including allotments.	

Local plan policies proposed to be retained

Table 49 - main issues raised on Local plan policies proposed to be retained and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
BCS7 'Centres and Retailing': Support retention but suggest it should include Imperial Retail Park, Hartcliffe Way as a district centre.	Existing out-of-centre developments do not constitute centres.	
BCS12 'Community Facilities': policy needs revising with more emphasis on community and cultural facilities, which should be required for each major development.	 Local Plan Publication Version contains two policies which update BCS12: Policy CF1 'Provision of community facilities' and Policy CF2 'Retention of community facilities'. 	

Main issues raised	How they were addressed		
	Introductory text to these policies makes reference to how they include cultural centres and venues.		
	For major development proposals which are likely to generate a need for new or extended community facilities, Policy CF1 expects schemes to provide at least 10% of ground floor space suitably fitted out for the use of community and/or cultural organisations and groups and made available at an affordable rent.		
BCS16 'Flood Risk and Water Management': Revise policy to include specific reference to requirement to ensure no adverse impact on third party interests resulting from new development or associated mitigation measures, in accordance with NPPF.	 BCS16 replaced by Local Plan Publication Version Policy FR1 'Flood risk and water management', which is considered to be in accordance with national planning policy. 		
BCS19 'Gypsies and Travellers and Travelling Showpeople': Evidence base outdated and policy will need updating.	 BCS19 replaced by Local Plan Publication Version Policy H10 'Planning for traveller sites'. 		
DM21 'Development of private gardens': Object to current policy as it is used to permit development and loss of green infrastructure.	DM21 replaced by Local Plan Publication Version Policy BG6 'Private gardens'.		
 DM23 'Transport Development Management': 	 DM23 'Transport Development Management': 		
 Update should reflect Joint Spatial Plan. Parking approach 	 Joint Spatial Plan withdrawn in 2020. Approach of DM23 reflected in Local Plan Publication Version Policy T3A 'Transport development management'. 		
should vary by area as per London Plan and its use of Public	 Approach to parking set out in Local Plan Publication Version Policy T4A 'Parking, servicing and the provision 		

Main issues raised	How they were addressed	
Transport Accessibility Levels.	of infrastructure for electric vehicles', which will be supported by guidance in the Transport Supplementary Planning Document.	
Site Allocations and Development Management Policies Local Plan Appendix A Parking	Site Allocations and Development Management Policies Local Plan Appendix A Parking Standards Schedule: Approach to electric vehicle.	
Standards Schedule:	 Approach to electric vehicle infrastructure and parking set out in 	
 Need references to electric vehicle charging. 	Local Plan Publication Version Policy T4A 'Parking, servicing and the provision of infrastructure for electric	
 New dwellings must include adequate parking spaces. 	vehicles', which will be supported by guidance in the Transport Supplementary Planning Document.	
 DM29 'Shopfronts, Signage and External Installations': Policy required on outdoor advertising. 	 Addressed by Local Plan Publication Version Policy AD1 'Advertisements'. 	
BCAP11 'University and Hospital Development': Explicit support for hospital and ancillary hospital development within defined hospital precinct is needed.	Addressed in Local Plan Publication Version Policy DS1 'Bristol City Centre'.	
BCAP26 'Old City - Reducing Traffic': Policy needs to be strengthened.	 Addressed in Local Plan Publication Version Policy DS1A 'Bristol City Centre – Broadmead, Castle Park and the Old City'. 	
BCAP 29 'Car and Cycle Parking': Policy needs to be strengthened. Parking policy should vary by area.	 Approach to parking addressed in Local Plan Publication Version Policy T4A 'Parking, servicing and the provision of infrastructure for electric vehicles', which will be supported by guidance in the Transport Supplementary Planning Document. 	
BCAP 30 'Pedestrian Routes': Network is unambitious. Needs to be	BCAP30 has been incorporated into a number of policies in the Local Plan Publication Version. For example:	
expanded and deadlines set for improvements.	 In the Central Bristol section of the 'Development Strategy' chapter, each 	

Main issues raised	How they were addressed		
	area policy makes reference to development including measures to secure public access and routes for walking.		
	 Policy T2 'Transport infrastructure improvements' highlights the provision of safe and attractive walking routes and references the plans and strategies which will deliver these enhancements. 		
	 Policy T3A 'Transport development management' expects development to provide for pedestrians including, where appropriate, enhancing the pedestrian network. 		
	 Policy T6 'Active travel routes' will also ensure that the function and amenity of Active Travel Routes is protected. This is supported by the expectation that proposals adjacent to the Active Travel Route network should, where possible, provide connections with existing or proposed routes. 		
BCAP32 'Quayside Walkways': Some progress has been made but standards and deadlines should now be set.	BCAP32 replaced by Local Plan Publication Version Policy BG5 'Biodiversity and access to Bristol's waterways'.		

Local plan policies proposed to be no longer retained

Table 50 - main issues raised on Local plan policies proposed to be no longer retained and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
BCS1 'South Bristol': Object	BCS1 replaced by South Bristol policies in the	
as policy emphasises	Local Plan Publication Version's	
improvements to	'Development Strategy' chapter which also	
pedestrian, cycling and	contain expectations for transport	
public transport facilities.	infrastructure and access improvements.	

Main issues raised

- BCS2 'Bristol City Centre':
 Object as policy emphasises
 improvements to
 pedestrian, cycling and
 public transport facilities.
- BCS8 'Delivering a Thriving Economy': Review policy to reflect market conditions re office floor space retention.
- BCS10 'Transport and Access Improvements':
 - Objection to removal of policy.
 - Should be revised to better control cars and heavy vehicles and prevent shared spaces.
 - Needs amending in reference to the Joint Transport Strategy and Joint Spatial Plan.
- DM12 'Retaining Valuable Employment Sites': Object to the loss of DM12, which should focus on preventing the loss of employment space.
- BCAP41 'The Approach to Harbourside': Object to loss, should be replaced by policy focusing on protection of and promotion of economic regeneration through tourism development in the Harbourside area.

How they were addressed

- BCS2 replaced by Central Bristol policies in the Local Plan Publication Version's 'Development Strategy' chapter which also contain expectations for transport infrastructure and access improvements.
- BCS8 replaced by policies in the 'Economy and inclusive growth' chapter of the Local Plan Publication Version. This includes Policy E2 'Economic development land strategy' which contains an updated approach to the provision and retention of workspace.
- BCS10 'Transport and Access Improvements':
 - Replaced by Local Plan Publication Version Policy T2 'Transport infrastructure improvements'. This provides an updated approach for delivering transport infrastructure enhancements.
 - Publication Version Policy T3A
 'Transport development management' sets out the transport considerations development proposals should address.
 - Joint Spatial Plan withdrawn in 2020.
- DM12 replaced by policies in 'Economy and inclusive growth' chapter of the Local Plan Publication Version. These include policies for the provision and retention of workspace for key sectors.
- Approach to tourism-related development set out in Local Plan Publication Version policies DS1 'Bristol City Centre' and SSE1 'Supporting Bristol's Centres - network and hierarchy'.

Stage 2 – Local Plan Review: Draft Policies and Development Allocations – Consultation (2019)

In March 2019 the council published the 'Bristol Local Plan Review – Draft Policies and Development Allocations – Consultation' document for comment. A total of 922 responses were received.

The main issues raised and how they were addressed in the Local Plan are set out in the tables below.

Vision: Building a better Bristol

Table 51 - main issues raised on Vision: Building a better Bristol and how they were addressed in the Local Plan

 Insufficiently radical to address climate change emergency. Priority of plan should be target of carbon neutrality by 2030. Too housing delivery focussed. Specific reference to / more emphasis needed on: protecting and increasing tree canopy cover; employment land provision, particularly in South Bristol; understanding barriers to access open space and creating safer spaces for women and children; expression of housing Insufficiently radical to address climate change emergency. Priority of plan should be target of carbon neutrality of plan should be target of carbon neutrality by 2030. The Local Plan Publication Version contains a positive vision for the future development of Bristol looking ahead to 2050. It addresses as succinctly as possible the key issues and needs facing the city, charting the expected progress on how they will be met. The vision is supported by a set of aims and objectives. These provide more detail on how the vision. References are provided to chapters in the Local Plan which contain policies with a particular focus on responding to the aims and objectives. The key matters raised in the 2018, 2019 and 2022 consultations have informed the vision, objectives, aims and / or policies of the Local Plan Publication Version. 	Main issues raised	How they were addressed
targets as minimum figures; addressing gentrification; provision of social housing; South Bristol, to address north/south economic divide in city; updated housing numbers if arising from Joint Spatial Plan examination; minimising	 Insufficiently radical to address climate change emergency. Priority of plan should be target of carbon neutrality by 2030. Too housing delivery focussed. Specific reference to / more emphasis needed on: protecting and increasing tree canopy cover; employment land provision, particularly in South Bristol; understanding barriers to access open space and creating safer spaces for women and children; expression of housing targets as minimum figures; addressing gentrification; provision of social housing; South Bristol, to address north/south economic divide in city; updated housing numbers if arising from Joint Spatial Plan 	The Local Plan Publication Version contains a positive vision for the future development of Bristol looking ahead to 2050. It addresses as succinctly as possible the key issues and needs facing the city, charting the expected progress on how they will be met. The vision is supported by a set of aims and objectives. These provide more detail on how the Local Plan will address the issues identified in the vision. References are provided to chapters in the Local Plan which contain policies with a particular focus on responding to the aims and objectives. The key matters raised in the 2018, 2019 and 2022 consultations have informed the vision, objectives, aims and / or policies of the Local

Main issues raised	How they were addressed
impacts of development for health and wellbeing; addressing environmental impacts, e.g. advocate a 'regenerative city' approach incorporating green roofs, street trees and pollinators; setting out strategic priorities; the council's Social Value Policy; and meaningful community engagement.	

Development strategy

Table 52 - main issues raised on Development strategy and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
Should better reflect climate change emergency declaration, with more focus needed on environmental over social and economic objectives.	Local Plan Publication Version contains an Aims and Objectives section with tackling the climate emergency referenced as one of four main objectives of the plan. Objectives will be pursued mutually.	
 Insufficient emphasis on providing employment land to support level of housing proposed, including lack of evidence to inform employment land requirements. 	 Addressed in Local Plan Publication Version Policy E2 'Economic development land strategy'. 	
 Increase emphasis on children, including advocating 'child friendly city' principles regarding play, design and community involvement. 	 Local Plan Publication Version focuses on ensuring new development is inclusive. This is specifically referred to in the plan's vision, aims, objectives and many of its policies. 	
 Tackling inequality should be included, with greater focus on a holistic approach to improving deprived areas. 	 Local Plan Publication Version's vision section includes reference to substantially narrowing inequality in the city. A number of policies support this, for example Policy E1 'Inclusive economic development'. This 	

Main issues raised	How they were addressed	
	seeks to ensure new development removes barriers to employment for local residents, facilitates skills development and supports employment initiatives.	
Strategy inconsistent with Bristol's 24-hour economy; i.e. how will strategy support night-time economy and events / festival culture.	Addressed in Local Plan Publication Version Policy SSE3 'Supporting Bristol's evening, night-time and culture economy'.	
References also needed to:	Requests for additional references:	
 Supporting opportunities for urban farming. 	 Addressed by Local Plan Publication Version policies FS3 'The protection of existing food growing enterprises and allotments' and Policy GI4 	
 Making use of unused and derelict buildings to create 	'Stapleton Allotments and Holdings – Food Growing Local Green Space'.	
new housing. o Protecting suburban	 Covered by Publication Version Policy UL1 'Effective and efficient use of land'. 	
gardens from development.	 Addressed by Publication Version Policy BG6 'Development of Private Gardens'. 	
Separate concerns expressed that number of homes to be delivered is too high or too low.	 Number of homes set out in Local Plan Publication Version Policy H1 'Delivery of new homes – Bristol's housing requirement'. 	
Transport:	Transport:	
 More reference needed to encouragement of walking as a mode 	 Addressed in Local Plan Publication Version policies T1 'Development and transport policies' and T6 'Active travel routes'. 	
of transport. Need for transport infrastructure improvements prior to major development.	 Addressed in Publication Version Policy T2 'Transport infrastructure improvements'. 	
Urban living:	Urban living:	

Main issue	es raised	How they were addressed		were addressed
0	Definition unclear and inconsistent.		0	More detail provided in policies in Local Plan Publication Version's Urban Living chapter, supported by Policy DC1 'Liveability in residential development including space standards, aspect and private outdoor space'.
0	Strategy needed to protect suburban gardens for climate change mitigation, wildlife and biodiversity.		0	Approach to this issue set out in Local Plan Publication Version Policy BG6 'Development of Private Gardens'.
0	High density housing approach incompatible with different housing types needed.		0	A number of Local Plan Publication Version policies will be used to ensure an appropriate housing mix is achieved. This includes the various area policies within the 'Development Strategy' chapter and Policy H4 'Housing type and mix'.
0	Adjacent councils should take greater proportion of Bristol's housing need.		0	The approach to meeting city's housing need explained in Local Plan Publication Version's 'Housing' chapter.
0	Highways England thought more consideration was needed on where high density new development will be located so that traffic and transport impacts can be assessed.		0	Addressed in suite of policies in Transport chapter of Local Plan Publication Version, including policies T1 'Development and transport policies' and T2 'Transport infrastructure improvements'.
that who the theorem the theorem the theorem the theorem the the theorem the theorem the the the theorem the the theorem the the theorem the the theorem the theorem the theorem the theorem the theorem the the theorem the theorem the theorem the theorem the theorem the the theorem t	I England considered hile development of field sites at higher es can be an efficient land, these sites can ortant for wildlife.	•	Version and Rewill be	insidered that Local Plan Publication in's Policy BG2 'Nature Conservation ecovery' will ensure any importance considered and addressed in mination of planning applications.

Main issues raised	How they were addressed	
Bristol Water noted that growth could lead to significant increase in water demand and this will need to be considered in water resource management plans.	 Local Plan Publication Version Policy NZC1 'Climate change, sustainable design and construction' seeks to address this issue by expecting new residential development to apply a higher standard of water efficiency than national building regulations. 	

Central Bristol

Draft Policy DS1: Bristol City Centre

Table 53 - main issues raised on Draft Policy DS1: Bristol City Centre and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Approach to retail provision unclear, e.g. compatibility with retained Bristol Central Area Plan Policy BCAP13 questioned. Review and update of evidence base suggested.	 Retail: Local Plan Publication Version Policy DS1 'Bristol City Centre' provides an appropriate strategic approach, identifying retail uses as a key part of the mix of development expected in this location. It is supported by Policy DS1A 'Bristol City Centre –
Workspace provision:	Workspace provision:
 Concern over type of jobs to be provided, i.e. that they should match skills of people living in central Bristol. 	 Local Plan Publication Version Policy DS1 'Bristol City Centre' advocates a mix of uses to reflect the diversity of city centre. This is expected to lead to a wide variety of employment opportunities.

Main issues raised	How they were addressed		
Managing student accommodation:	 Managing student accommodation: Local Plan Publication Version Policy DS1 'Bristol City Centre' maintains the 2019 draft approach that purpose-built student accommodation will be carefully managed and directed towards identified areas in the city centre, with reference to Policy H7 'Managing the development of purpose-built student accommodation'. 		
Flood risk:	• Flood risk:		
 Environment Agency thought flood risk needed to be addressed strategically before development can come forward in this location. 	Supporting text to Local Plan Publication Version Policy DS1 'Bristol City Centre' acknowledges flood risk in this location and explains that this risk will be managed to ensure the city centre can continue to flourish and grow. Publication Version Policy FR1 'Flood risk' provides more detail on the approach to this issue while Policy FR2 'Bristol Avon Flood Strategy' sets out how it will be addressed on a strategic basis consistent with the Bristol Avon Flood Strategy.		
Development amounts:	Development amounts:		
 More clarity sought on amount of employment land and residential development to be provided. 	 An estimate of the number of new homes expected to be provided in the City Centre Development and Delivery Plan area is provided in supporting text to Local Plan Publication Version Policy DS1 'Bristol City Centre'. Local Plan Publication Version Policy E2 'Economic development land strategy' provides the strategic policy approach to the scale and location of new workspace to be provided over the plan period. 		
Insufficient reference to the Stokes Croft and its	 Approach to Stokes Croft addressed in Local Plan Publication Version Policy SSE2 		

Main issues raised	How they were addressed
issues and opportunities such as heritage and socioeconomic deprivation. Area should be identified for mixed-use development.	'Development in Bristol's centres'. This sets out that the emphasis of new development will be on retaining a mix of uses to maintain the location's character and sustainability.
Commitment to zero carbon development needed along with presumption against parking provision in city centre developments.	 Local Plan Publication Version's approach is set out in policies in the 'Net zero and climate' chapter. Approach to car parking provision is addressed in Local Plan Publication Version policy T4A 'Parking, servicing and the provision of infrastructure for electric vehicles', amongst other policies.

Draft Policy DS2: Bristol Temple Quarter

Table 54 - main issues raised on Draft Policy DS2: Bristol Temple Quarter and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Workspace provision:	Workspace provision:
 Concern over type of jobs to be provided, i.e. that they should match skills of people living in central Bristol. 	 Local Plan Publication Version Policy DS2 'Bristol Temple Quarter' advocates a mix of uses. This is expected to lead to a wide variety of employment opportunities.
 Should specify more Research and Development employment uses to be provided. 	 A flexible approach is proposed which could include Research and Development uses.
 Requirement to provide workspaces may jeopardise new development on viability grounds. 	 Policy DS2 'Bristol Temple Quarter' considered to be an appropriate approach, advocating a mix of uses and reflecting the Bristol Temple Quarter Development Framework, approved by the council in 2023.
Temple Island:	Temple Island:
 Requirement that masterplan will guide development 	 Local Plan Publication Version Policy DS2 'Bristol Temple Quarter' makes clear that this area should be

Main issues raised	How they were addressed	
questioned as could delay delivery of schemes.	developed for a variety of uses with proposals to accord with the Bristol Temple Quarter Development Framework.	
Transport and infrastructure improvements: Clarity sought on	 Transport and infrastructure improvements: Local Plan Publication Version Policy DS2 'Bristol Temple Quarter' makes 	
 Clarity sought on how these will be delivered. 	reference to Temple Meads station regeneration plans. Other improvements will be delivered as part of new development schemes in accordance with Publication Version Policy IDC1 'Development contributions and CIL' or through separately delivered plans and programmes referred to in Publication Version Policy T2 'Transport infrastructure	
Flood risk:	improvements'.Flood risk:	
 Unreasonable to expect developers to carry out sequential test as this should be undertaken by the council prior to allocating a site; 	 Approach considered appropriate and supported by national planning policy. Local Plan Publication Version Policy DS2 'Bristol Temple Quarter' supported by Policy FR1 'Flood risk' which provides more detail on the approach to this issue. 	
 Environment Agency thought flood risk needed to be addressed strategically before development can come forward. Policy needs strengthening as most of area is at high risk of flooding. Sequential and Exception tests will need be applied. 	 Local Plan Publication Version Policy DS2 'Bristol Temple Quarter' is supported by Policy FR1 'Flood risk' which provides more detail on the approach to this issue. Policy FR2 'Bristol Avon Flood Strategy' sets out how it will be addressed on a strategic basis consistent with the Bristol Avon Flood Strategy. 	

Main issues raised	How they were addressed	
Reference needed to Temple Quarter Enterprise Zone Spatial Framework.	 References included within Local Plan Publication Version Policy DS2 'Bristol Temple Quarter'. 	
Development amounts:	Development amounts:	
 More clarity sought on amount of employment land and residential development to be provided. 	 Estimate of number of new homes expected to be provided set out in Publication Version Policy DS2 'Bristol Temple Quarter'. Policy DS2 expects development to accord with the Bristol Temple Quarter Development Framework, which provides more details on workspace provision. This is supported by Local Plan Publication Version Policy E2 'Economic development land strategy' which sets out the strategic policy approach to scale and location of new workspace to be provided over plan period. 	
Importance of involving community groups in design of schemes and masterplanning.	 Policy DS2 expects development to accord with the Bristol Temple Quarter Development Framework, the preparation of which involved a wide variety of community engagement methods. Local Plan Publication Version Policy DPM1 'Delivering well- designed, inclusive places' expects major development applications to show how their schemes have been informed by early, proactive and effective community engagement. 	
Concern that retail and leisure uses might undermine Bristol Shoppin Quarter.	Policy makes clear that any retail and leisure uses will be complementary to main uses proposed. This is supported by Local Plan Publication Version Policy SSE2 'Development in Bristol's centres' which states that Bristol Shopping Quarter will be the priority location for major shopping facilities.	
 Other uses suggested for inclusion in policy: urban farming. 	 Policy DS2 sets out an approach to the provision of key uses appropriate to this location and reflecting emerging development proposals. Any proposals for 	

Main issues raised	How they were addressed
social enterprises for high-tech solutions.	the uses suggested will be considered against relevant planning policies and considerations.
o night clubs.	
o tourism.	
Natural England thought more specific measures regarding green infrastructure could be included.	 This issue is considered to be adequately addressed with appropriate references in the policy, for example that development should include new and enhanced green infrastructure. This will be supported by application of the suite of policies in the Local Plan Publication Version's 'Biodiversity and Green Infrastructure' chapter.

Draft Policy DS3: St Philip's Marsh

Table 55 - main issues raised Draft Policy DS3: St Philip's Marsh and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Infrastructure and transport:	 Infrastructure and transport: Local Plan Publication Version Policy DS3 'St Philip's Marsh' expects development to accord with the Bristol Temple Quarter Development Framework, which addresses existing infrastructure and transport issues as well as land use characteristics.
Flood Risk:	 Flood Risk: Publication Version Policy DS3 'St Philip's Marsh' makes appropriate reference to flood risk issues. This is supported by Publication Version Policy FR1 'Flood risk' which provides more detail on the approach. Policy FR2 'Bristol Avon Flood Strategy' sets out how it will be addressed on a strategic basis consistent with the Bristol Avon Flood Strategy.

Main issues raised	How they were addressed
management strategy.	
Workspace:	Workspace:
 Clarify how proposed increase in job numbers and enhanced business diversity will be tracked. 	 Appropriate monitoring of the Local Plan's key policies will be undertaken and published in the Authority's Monitoring Report. This will inform the review of the Local Plan and the effectiveness of its policies which will take place within five years of plan adoption.
 Requirement to provide workspace may jeopardise new development on viability grounds. 	 Policy DS3 'St Philip's Marsh' considered to be an appropriate approach, advocating a mix of uses and reflecting the Bristol Temple Quarter Development Framework, approved in 2023.
 Importance of existing workspace in area, such as recycling operations and railway depot. 	 This is considered to be adequately addressed with the policy's references to development ensuring the retention, refurbishment, intensification and innovative reincorporation of workspace in this location.
Reference needed to Temple Quarter Enterprise Zone Spatial Framework.	References included within Publication Version Policy DS3 'St Philip's Marsh'.
To guide development, clarity needed on specific allocations or a phasing map, along with timescales for masterplan production and its planning status.	Publication Version Policy DS3 'St Philip's Marsh' no longer makes reference to a masterplan. Instead development is expected to accord with the Bristol Temple Quarter Development Framework, approved in 2023.
Flexibility needed to recognise that specific sites can come forward in advance of the masterplan.	Publication Version Policy DS3 'St Philip's Marsh' no longer makes reference to a masterplan. Instead development is expected to accord with the Bristol Temple Quarter Development Framework, approved in 2023.
Development amounts:	Development amounts:

Ma	nin issues raised	es raised How they were addressed	
	 More clarity sought on amount of employment land and residential development to be provided. 	on amount of Marsh' expects development to employment land form, scale and density consiste its central urban location. It als development to be	be of a ent with o expects e Bristol
•	Appropriateness of tall buildings, including building heights, should be specified.	draft policy and this is maintained in the season of the s	in Philip's will be y DC2 'Tall
•	Include Avonmeads Retail Park within policy area.		blication
•	Rather as extension to Temple Quarter, area should be seen as part of Lawrence Hill, Barton Hill and cater for needs of residents in those locations.	addressed in Publication Version Policy be seen as part of made to development demonstration atter for needs of measures to create a neighbourhood welcoming to all, especially in resp	olicy DS3 ference is ing od that is ect of
•	North west St Philip's Marsh:	·	
	 Should specify appropriateness of mixed-use development that optimises use of river. 	appropriateness of mixed-use ensure development that optimises use of Policy DS3 'St Philip's Marsh ensure development along Road addresses and enhance canal-side environment.	n' to Feeder
	 Should support purpose-built student accommodation given proximity to University of Bristol's Temple Quarter Enterprise Campus. 	purpose-built accommodation is reference student Publication Version Policy Dublication Version Policy Dublication Version Policy Publication Version Policy Dublication Version Versio	ed in PS3 'St orted by I7

Main issues raised	How they were addressed
 Clarification sought on boundary of area and meaning of 'other more intensive forms of use appropriate to a location adjacent to the city centre'. 	o Boundary considered to be clear with reference to the map provided with Publication Version Policy DS3 'St Philip's Marsh' plus changes made to the Publication Version which now refers to 'north west St Philip's Marsh', 'South St Philip's Marsh' and 'North East St Philip's Marsh'. Bristol Temple Quarter Development Framework provides more detail. Reference to intensive forms of use provides useful flexibility for an assessment to be made of the appropriateness of specific proposals in this location close to the city centre.
South of Albert Road:	• South of Albert Road:
 Should specify appropriateness of mixed-use development that optimises use of river. 	 Publication Version Policy DS3 'St Philip's Marsh' amended so area is now referred to as 'South St Philip's Marsh'. Policy includes reference to redevelopment of this location addressing and enhancing its river front setting.
 Clarification sought on boundary of area. 	 Boundary considered to be clear with reference to the map provided with Publication Version Policy DS3 'St Philip's Marsh' plus changes to the Publication Version which now refers to 'north west St Philip's Marsh', 'South St Philip's Marsh' and 'North East St Philip's Marsh'.
 Concern about potential loss of significant recycling industry and impact on local employment opportunities. 	 Approach considered appropriate, reflecting the location's good accessibility credentials and potential to accommodate new mixed-use development in a regenerated area of the city, complementing the adjacent Bristol Temple Quarter.
Feeder canal:	Feeder canal:

Main issues raised	How they were addressed
 Should specify appropriateness of mixed-use development that optimises use of river. 	 Text added to Publication Version Policy DS3 'St Philip's Marsh' to ensure development along Feeder Road addresses and enhances its canal-side environment.
 Clarification sought on boundary of area. 	 Boundary considered to be clear with reference to the map provided with Publication Version Policy DS3 'St Philip's Marsh' plus changes to the Publication Version which now refers to 'north west St Philip's Marsh', 'South St Philip's Marsh' and 'North East St Philip's Marsh'.
• Eastern St. Philip's Marsh:	Eastern St. Philip's Marsh:
 Clarification sought on boundary of area and whether there would be a presumption against residential- only planning applications in this location. 	 Publication Version Policy DS3 'St Philip's Marsh' has been amended so that this area is now incorporated within 'North East St Philip's Marsh' and 'South St Philip's Marsh'. The policy expects development to be one of mixed-uses. Reference is also made to development being in accordance with the Temple Quarter Development Framework, which provides more guidance to inform development proposals.

Draft Policy DS4: Western Harbour

Table 56 - main issues raised on Draft Policy DS4: Western Harbour and how they were addressed in the Local Plan

Main issues raised		How they were addressed	
•	Potential harm to important character, views, heritage assets and features.	Local Plan Publication Version Policy DS4 'Western Harbour' refers to proposals having regard to the area's important heritage assets and responding appropriately to key views and landmarks.	
•	Inappropriate to promote intensive development as not considered to be city centre location in terms of	References to intensive development not included in Publication Version Policy DS4. Instead development will be expected to accord with a masterplan, the vision for	

Main issues raised		Но	How they were addressed		
	character and history.		which was approved in 2022 following public consultation.		
•	Need for effective engagement with local community.	•	Publication Version Policy DS4 refers to development being in accordance with a masterplan, the vision for which was approved in 2022 following public consultation. Work continues on the masterplan's preparation with ongoing community engagement.		
•	'Do nothing' approach and other options need to be fully explored.	•	Justification for the approach set out in introductory text to Publication Version Policy DS4 'Western Harbour'.		
•	Clarity needed on capacity of area to accommodate housing given lack of detail over road reconfiguration and land release.	•	Appropriate housing capacity will be considered as part of the master planning process referred to in Publication Version Policy DS4 'Western Harbour'.		
•	Proposals for tall buildings considered inappropriate.	•	Tall buildings not specifically referred to in draft policy and this is maintained in Publication Version Policy DS4 'Western Harbour'. Any tall building proposals will be considered with reference to Policy DC2 'Tall buildings' and all other relevant policies.		
•	Concern over impact on existing businesses such as the tannery on Coronation Road, as well as need to retain important maritime industry businesses.	•	Justification for the approach is set out in introductory text to Publication Version Policy DS4 'Western Harbour'. Supporting text to Local Plan Publication Version Policy DS4 'Western Harbour' makes clear that maritime industries at Underfall Yard will continue to be retained.		
•	Opposition to proposal for further student accommodation as considered to be an existing high concentration.	•	References to student accommodation not included in Publication Version Policy DS4 'Western Harbour'. Approach to this issue set out in Publication Version Policy H7 'Managing the development of purpose-built student accommodation'.		
•	Insufficient focus on tourism and leisure, particularly with Bristol Central Area Plan policy	•	Approach to tourism-related development set out in Local Plan Publication Version policies DS1 'Bristol City Centre' and SSE1 'Supporting Bristol's Centres - network and		

Main issues raised	How they were addressed
BCAP9 not being proposed for retention.	hierarchy'.
Concern about potential loss of open space.	Addressed with references in Publication Version Policy DS4 'Western Harbour' to the retention and provision of high quality public open spaces and development being in accordance with a masterplan.
Design proposals too vague.	 Addressed in 'Place principles' of Publication Version Policy DS4 'Western Harbour'. For example, that development should have regard to the area's important heritage assets, respond appropriately to key views and landmarks and accord with the masterplan being prepared for the area. Policies in the Publication Version's 'Design and conservation' chapter will also be relevant.
Historic England thought evidence should be gathered and applied, including views analysis, to demonstrate how strategic form and capacity assumptions have been established.	• It is considered that the Publication Version Policy DS4 'Western Harbour' provides an appropriate approach. It ensures development proposals have regard to the area's important heritage assets and respond appropriately to key views and landmarks. This is supported with references to the masterplanning process which will be informed by analysis of important heritage issues. Proposals will be expected to accord with the masterplan which results from this process.
Environment Agency thought flood risk needed to be addressed strategically before development can come forward. Policy needs strengthening as most of area is at high risk of flooding. Sequential and Exception tests will need be applied.	Policy DS4 'Western Harbour' sets out approach to flood risk. Publication Version Policy FR1 'Flood risk' provides more detail on the approach while Policy FR2 'Bristol Avon Flood Strategy' sets out how it will be addressed on a strategic basis consistent with the Bristol Avon Flood Strategy.

Draft Policy DS5: Frome Gateway

Table 57 - main issues raised on Draft Policy DS5: Frome Gateway and how they were addressed in the Local Plan

Main issues raised		How they were addressed	
leis mig und	ncern that retail and ure uses in this area ght potentially dermine Bristol Shopping arter.	•	Local Plan Publication Version Policy DS5 'Frome Gateway' amended. Reference now made to retail and leisure development which meets local needs.
сар	ential new housing pacity considered to be ch higher.	•	Publication Version Policy DS5 'Frome Gateway' amended. Estimate of expected new homes now provided in explanatory text. Policy refers to development being in accordance with the Frome Gateway Spatial Regeneration Framework, which will shape development in the area.
	ncern over potential loss obs which match local ls.	•	Publication Version Policy DS5 'Frome Gateway' advocates a mix of uses. This is expected to lead to a wide variety of employment opportunities.
wild pub	green space or key dlife corridors lost and olic rights of way intained.	•	Publication Version Policy DS5 'Frome Gateway' makes reference to development enhancing the River Frome as a townscape feature, pedestrian route and green infrastructure corridor. The policy also requires development to accord with the Frome Gateway Spatial Regeneration Framework. This is currently being developed in consultation with the community and stakeholders and will further guide development proposals in the area taking into account important local issues.
sou pro Fra the sch dev Flo	vironment Agency Ight consultation on the Ipposed Spatial Imework that addresses I sequential layout of I emes, with I velopment located in I od Zone 1 wherever I ssible.	•	Publication Version Policy DS5 'Frome Gateway' sets out approach to flood risk. Publication Version Policy FR1 'Flood risk' provides more detail. Frome Gateway Spatial Regeneration Framework will also address this issue.

East Bristol

Table 58 - main issues raised on East Bristol and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Greater recognition and reference needed to transport infrastructure improvements required to support new development. Examples included improvements to Stapleton Road and Lawrence Hill railway stations and reducing traffic on arterial routes such as Church, Fishponds and Stapleton Roads.	 Local Plan Publication Version policies in this chapter provide appropriate reference to transport infrastructure improvements required from new development proposals. Other improvements will be delivered through separately delivered plans and programmes referred to in Publication Version Policy T2 'Transport infrastructure improvements'.

Draft Policy DS6: Lawrence Hill

Table 59 - main issues raised on Draft Policy DS6: Lawrence Hill and how they were addressed in the Local Plan

M	ain issues raised	How they were addressed	
•	Stronger commitment required on reconfiguration of Lawrence Hill roundabout.	 Appropriate reference is provided in draft policy and this is maintained in Local Plan Publication Version Policy DS6 'Lawrence Hill'. 	
•	Council-led masterplan needed.	Publication Version Policy DS6 'Lawrence Hill' provides appropriate basis for shaping development proposals in this location. This is supported with reference to development also being expected to accord with a regeneration framework which will coordinate the approach to development across the area.	
•	Specific reference sought to delivery of social, council, affordable and family housing, with associated targets.	This is considered to be addressed with reference to new development including a mix of types, sizes and tenures. This will be supported by Publication Version policies Policy AH1 'Affordable housing provision' and Policy H4 'Housing type and mix'.	

Main issues raised	How they were addressed	
Both support and objection to potential for tall buildings.	Draft policy made clear that tall buildings may be appropriate and this approach is maintained for the Publication Version. Both refer to supporting Policy DC2 'Tall buildings'. This sets out criteria to ensure important planning considerations are appropriately considered.	
Existing pressures on services and infrastructure raised, with need to secure adequate improvements alongside new development, such as active travel proposals.	 Text has been added to Publication Version Policy DS6 'Lawrence Hill'. This states that, as part of securing comprehensive change in this area, individual development sites will be expected to contribute appropriately to the delivery of supporting infrastructure, services and facilities. 	

Draft Policy DS7: Central Fishponds

Table 60 - main issues raised on Draft Policy DS7: Central Fishponds and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Council-led masterplan needed.	 Local Plan Publication Version Policy DS7 'Central Fishponds' provides appropriate basis for shaping development proposals in this location. This is supported with reference to development being expected to accord with a regeneration framework which will coordinate the approach to development across the area.
Potential new housing capacity considered to be much higher.	 Publication Version Policy DS7 'Central Fishponds' maintains draft policy approach. This makes clear that higher levels of density may be appropriate subject to a co- ordinated approach to development which delivers quality urban design.
 Concerns about increased pressure on local services as well as noise, traffic and congestion impacts, particularly at Station Road, Filwood Road bridge and Hockey's Lane. 	Text has been added to Publication Version Policy DS7 'Central Fishponds'. This states that, as part of securing comprehensive change in this area, individual development sites will be expected to contribute appropriately to the delivery of supporting infrastructure, services and facilities.

Main issues raised	How they were addressed
Objection to potential of tall buildings due to concerns about higher density leading to negative traffic impacts.	 Draft policy made clear that tall buildings may be appropriate and this approach is maintained for the Publication Version. Both refer to supporting Policy DC2 'Tall buildings'. This sets out criteria to ensure important planning considerations are appropriately considered.

South Bristol

Table 61 - main issues raised on South Bristol and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Insufficient employment land proposed in South Bristol to: Provide for current and future employment and business creation needs. Address north / south Bristol economic divide. 	 Supporting text to the Local Plan Publication Version chapter on South Bristol explains the approach to addressing this issue. Building on recent significant health, workspace, educational and transport infrastructure improvements and provision, it refers to the Local Plan approach of continuing to safeguard large areas of land for industry. New industry and distribution locations are also proposed, while new workspace will be created in growth and regeneration areas as well as part of mixed-use development allocations.

Draft Policy DS8: Central Bedminster

Table 62 - main issues raised on Draft Policy DS8: Central Bedminster and how they were addressed in the Local Plan

Ma	ain issues raised	How they were addressed
•	Potential new housing capacity including student accommodation considered to be much higher.	 Local Plan Publication Version Policy DS8
•	Need for more specific wording to ensure housing mix matches likely occupiers, i.e. smaller units	Considered to be addressed with reference to development contributing to an appropriate mix of housing type. Issue also addressed by Local Plan Publication Version

Main issues raised	How they were addressed
for younger age grou first-time buyers.	os and Policy H4 'Housing type and mix'.
Workspace:	Workspace:
 Strengthen positive ensure a rang workspaces at provided as positive proposed mixed-use approach. 	e of made adequate reference to this issue and this has been maintained in
 Clarify what workspace wi sought, e.g. re specific use cl 	efer to
 Lack of evider suggest dema new workspace Therefore mater be necessary provide new workspace on redeveloped employments 	nd for se. y not
Important to maintai uniqueness of Bedmi character, including r residential and previous industrial buildings.	addressed issue of character with reference to development reinforcing the area as a
Objection to tall build high density approach to negative impacts of character and views.	may be appropriate and this approach is

Main issues raised	How they were addressed
	important planning considerations are appropriately considered.

Draft Policy DS9: Brislington

Table 63 - main issues raised on Draft Policy DS9: Brislington and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Boundary should include Wilverley Trading Estate on north side of Bath Road.	Boundary in draft policy considered appropriate and maintained in Publication Version Policy DS9 'Brislington'.
Unclear what would constitute 'an appropriate form and amount of new workspace' to be provided in mixed-use schemes.	Further detail provided in Publication Version Policy E6A 'New workspace within mixed use development'.
Environment Agency advised development to be located outside the current and future floodplain of the Brislington Brook. It was noted that flood risk was not referred to, despite being an issue locally.	It is considered that this issue will be addressed by Local Plan Publication Version Policy FR1 'Flood risk and water management'.

Hengrove and Knowle West

Table 64 - main issues raised on Hengrove and Knowle West and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Concern about lack of new local plan policy relating to Knowle West, Hartcliffe, Withywood, Hengrove, Whitchurch Park and Bishopsworth and how sustainable mixed communities can be created. A South Bristol Regeneration Framework was requested.	It is considered that appropriate development plan policy coverage will be provided by new policies and proposals in the Local Plan Publication Version as well as the Hengrove and Whitchurch Park Neighbourhood Plan, which came into force in 2019.

Ma	ain issu	es raised	Но	How they were addressed	
•	Allocate more employment land in Filwood and Knowle West.		•	Supporting text to Local Plan Publication Version chapter on South Bristol refers to the Local Plan approach of continuing to safeguard large areas of land for industry. New industry and distribution locations are also proposed, while new workspace will be created in growth and regeneration areas as well as part of mixed-use development allocations. More detail is provided in the Local Plan Publication Version's 'Economy and inclusive growth' chapter, including policies E2 'Economic development land strategy' and E5 'Industry and Distribution Areas'.	
•	Hengr	ove Park:	•	Hengrove Park:	
	0	Query why proposal for second town centre at Hengrove Park has been dropped. Concern at lack of sizeable employment land allocation at Hengrove Park, given local workspace demand.		 Hengrove and Whitchurch Park Neighbourhood Plan will steer the approach to development in Hengrove Park. The Local Plan Publication Version also explains that planning permission has been granted for the major residential-led mixed-use redevelopment of Hengrove Park. 	
•	Knowl	(nowle West:	•	Knowle West:	
	0	Reference to Knowle West Regeneration Framework should be expanded to update on most its recent guidance and agreed objectives. Developers should be expected to show how their schemes have		 It is considered that appropriate reference to the Regeneration Framework was made in the 2019 consultation and this has been maintained for the Local Plan Publication Version. 	

Framework.

Main issues raised		How they	were addressed
clear r increa numbe and fa the ar superi Filwoo or imp	ern there is no mechanism for sing the er of services icilities within ea, e.g. market on od Broadway, provement of centres.	0	Local Plan Publication Version Policy IDC1 'Development contributions and CIL' will be used to ensure new development is supported by the provision of infrastructure, services and facilities.
existir Broad Site Al (BSA1 BSA11 increa	der updating ng Filwood way Local Plan llocations 120 and 122) to use level of floorspace t.	0	Amount of proposed retail floorspace in existing allocations considered appropriate and maintained for the Local Plan Publication Version.
Local I Alloca consid for co housir	ng Novers Hill Plan Site tion BSA1108 dered suitable mmunity-led ng opment.	0	The existing boundary for Site Allocation BSA1108 is no longer considered appropriate for housing. A revised boundary has been drawn for the Local Plan Publication Version which covers only the previously developed part of BSA1108. This is now referenced as BSA1108A and is proposed for a housing allocation. Proposals for community-led housing are encouraged by Publication Version Policy H5 'Self-build and community-led housing'.

Draft Policy DS10: Changes to the Green Belt in South Bristol

Table 65 - main issues raised on Draft Policy DS10: Changes to the Green Belt in South Bristol and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Lack of justification that exceptional circumstances created by South Bristol Link Road.	The draft proposals in 2018 and 2019 have been amended for the Local Plan Publication Version following consultation in 2022. Land at Yew Tree Farm is no longer proposed as a development allocation. The approach to remove from the

Main issues raised

- Land performing Green Belt functions.
- Preference for brownfield development focus over greenfield / Green Belt.
- Concern about piecemeal approach with potential for Green Belt release in adjoining land in Bath and North East Somerset.
- Contrary to sustainable development and tackling climate change objectives.
- Need for housing questioned.
- Green Belt land important for food production.
- Potential for development land created by South Bristol Link Road to provide additional employment land should be assessed.
- Bath and North East
 Somerset Council suggest
 BCC should consider any spatial implications arising from the identification in the Joint Spatial Plan of a strategic development location at Whitchurch. The allocation of this land will be delivered through the Bath and North East Somerset Local Plan and will require significant new transport infrastructure.
- Environment Agency object to development allocation adjacent to Long Ashton Park and Ride due to concern at lack of evidence

How they were addressed

Green Belt land at Ashton Vale and adjacent to Elsbert Drive and identify them as development allocations has been maintained; Local Plan Publication Version policies DS10 'The Green Belt' and DS11 'Development allocations – southwest Bristol' refer.

The approach is considered appropriate to ensure a sufficient number and range of development sites is available to meet housing need.

Policy DS11 explains that land at Ashton Vale has now received planning permission (ref. 21/03166/P) for around 500 homes. It also states that development on land adjacent to Elsbert Drive should be in accordance with a detailed cross-boundary development framework or master plan prepared in consultation with the local community.

Publication Version Policy H5 'Self-build and community-led housing' requires 5% of homes in the allocation at land adjacent to Elsbert Drive to be in the form of self-build/custom-build housing and/or community-led housing.

Main issues raised	How they were addressed
that site is not at flood risk. Issue relates to flood storage area as mitigation for the MetroBus scheme and failure to update Flood Map with latest flood modelling information. Need to ensure proposed allocation is not adversely impacted by nearby flood storage area.	

Draft Policy DS11: Development allocations – southwest Bristol

Table 66 - main issues raised on Draft Policy DS11: Development allocations – southwest Bristol and how they were addressed in the Local Plan

Ma	ain issues raised	How they were addressed
•	Lack of justification that exceptional circumstances have been created by South Bristol Link Road construction.	The draft proposals in 2018 and 2019 have been amended for the Local Plan Publication Version following consultation in 2022. Land at Yew Tree Farm is no longer proposed as a development allocation. The approach to remove from the
•	Land currently performs Green Belt functions.	Green Belt land at Ashton Vale and adjacent to Elsbert Drive and identify them as development allocations has been maintained; Local Plan
•	Preference for brownfield development focus over Green Belt.	Publication Version policies DS10 'The Green Belt' and DS11 'Development allocations – southwest Bristol' refer.
•	Contrary to sustainable development and tackling climate change objectives.	The approach is considered appropriate to ensure a sufficient number and range of development sites is available to meet housing need.
•	Need for housing questioned.	Policy DS11 explains that land at Ashton Vale has
•	Land important for food production and biodiversity / nature recovery.	now received planning permission (ref. 21/03166/P) for around 500 homes. It also states that development on land adjacent to Elsbert Drive should be in accordance with a
•	Concern at potential negative impacts on health and wellbeing due to loss of recreation land.	detailed cross-boundary development framework or master plan prepared in consultation with the local community. Publication Version Policy H5 'Self-build and
		community-led housing' requires 5% of homes in

Main issues raised		es raised	How they were addressed
•	issues conges transp plus ac	rbation of existing around traffic, stion, air quality and fort infrastructure ccess to community es such as GPs and ls.	the allocation at land adjacent to Elsbert Drive to be in the form of self-build/custom-build housing and/or community-led housing.
•	Clarific	cations sought on:	
	0	affordable housing delivery for the sites.	
	0	how development proposals in adjoining North Somerset Council's area will coincide with Policy DC11.	
	0	transport infrastructure plans including Park and Ride for the A38.	
•		tions should be for uses rather than only s.	
•	Land a	nt Ashton Gate:	
	0	Should be re-named 'Land North of Metrobus at Ashton Vale'.	
	0	Policy should be flexibly worded to allow for more than 500 homes to be provided.	
	0	Acknowledgement needed in policy to co-operate with North Somerset Council as access to	

Main issues raised		How they were addressed
	site required within NSC's area.	
• Land a	at Yew Tree Farm:	
0	Objection to loss of Green Belt land and last working farm in city's boundaries.	
0	Concern at potential negative impacts on environment, traffic, congestion, air quality and infrastructure.	
0	Will make insignificant contribution to housing delivery, with any benefits outweighed by environmental costs.	
• Land a Drive:	adjacent to Elsbert	
0	Capacity considered to be 120 homes. Policy should state minimum of 100 homes and up to 150.	
0	Objection to loss of Green Belt land.	
0	Preference for brownfield development focus over Green Belt.	
0	Concern at potential negative impacts on health and wellbeing, amenity, environment, traffic, congestion,	

Main issues raised	How they were addressed
road safety, air quality, biodiversity, semi-rural character and infrastructure.	
 150 homes considered to be overdevelopment. 	
Affordable housing:	
 Lack of justification for 40% requirement. 	
 Flexibility needed as some sites may need significant remediation and have higher development costs. 	
• Community led / self-build (5% requirement):	
 Query why requirement not applied to other proposed allocations across Bristol. 	
 Lack of justification as could affect viability / delivery of rest of allocation sites. 	
 Remove requirement as not possible to create separate community led / self-build area given small size of allocation sites. 	
North Somerset Council wished to work with BCC to ensure alignment of	

Main issues raised	How they were addressed
diverted Ashton Vale Road is shown in Local Plan. To address issue of avoiding merger with Long Ashton, they also thought policy criteria should reference Area of Separation designated in Long Ashton Neighbourhood Plan at land north of Ashton Vale Town Green.	

Draft Policy DS12: New neighbourhood – Bath Road, Brislington

Table 67 - main issues raised on Draft Policy DS12: New neighbourhood — Bath Road, Brislington and how they were addressed in the Local Plan

Ma	in issues raised	How they were addressed	
•	Should also include land north of A4 Bath Road, including Brislington Cricket Club.	 Boundary considered appropriate and maintained for Local Plan Publication Version Policy DS12 'New neighbourhood – Bath Road, Brislington'. 	n
•	Objection to loss of Green Belt land and open space and lack of accompanying evidence.	 Rationale explained in draft policy, which is maintained for Publication Version Policy DS12. 	
•	Concern about biodiversity impacts, such as loss of potential nature recovery sites and mature trees.	Publication Version Policy DS12 refers to new development addressing retention of important trees, hedgerows and other green infrastructure as well as biodiversity gain.	n
•	Concern about potential for worsened air quality and traffic congestion.	Addressed by reference in Publication Version Policy DS12 to new development being supported by appropriate local and strategic transport infrastructure.	
•	Policy should require developers to bring forward a co-ordinated masterplan.	Publication Version Policy DS12 requires development to be in accordance with a detailed development framework or master plan prepared in consultation with the local community.	
•	Site has potential to deliver significant amount of employment land for South	 Approach of Publication Version Policy DS12 for residential-led mixed use development considered appropriate. Local Plan 	2

Main issues raised	How they were addressed
East Bristol.	Publication Version Policy E2 'Economic development land strategy' provides the strategic policy approach to the scale and location of new workspace to be provided over the plan period.
Affordable housing:	Affordable housing:
 Lack of justification for 40% requirement. 	 Policy DS12 expects development to provide an appropriate level of affordable housing with a 35% requirement referred to. This is considered to be a suitable amount, with more detail provided in Publication Version Policy AH1 'Affordable housing provision'.
• Community led / self-build (5% requirement):	 Community led / self-build (5% requirement):
o Should be 10%.	 This has been maintained for
 Lack of justification as could affect viability / delivery of main part of housing allocation. 	Publication Version Policy DS12 and is considered appropriate. More detail provided in Publication Version Policy H5 'Self-build and community-led housing'.
Bath and North East Somerset suggested joint work with BCC to:	On-going joint work has been progressed.
 revised Green Belt boundary to be identified in both councils Local Plans. 	
 agree site of re- located Brislington Park and Ride. 	
 identify infrastructure requirements such as health and education facilities. 	
Environment Agency identified that part of proposed area falls within	It is considered that this issue will be addressed as part of the preparation of a detailed development framework or master

Main issues raised	How they were addressed
Flood Zone 3. Development	plan carried out in consultation with the
should be located within	local community and stakeholders referred
Flood Zone 1 following	to in Publication Version Policy DS12. It will
sequential principles if	also be covered by Publication Version Policy
possible.	FR1 'Flood risk and water management'.

North Bristol

Table 68 - main issues raised on North Bristol and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Reference sought to public transport routes and improvements which will support housing growth, such as Henbury Line.	 Local Plan Publication Version policies in this chapter provides appropriate reference to transport infrastructure improvements required from new development proposals. Other improvements will be delivered through separately delivered plans and programmes referred to in Publication Version Policy T2 'Transport infrastructure improvements'.
Refer to Brabazon Hangar and its mixed-use redevelopment potential.	 Planning permission for the conversion of the Brabazon Hangars into an events arena granted in 2020. Not considered necessary to refer to this in Local Plan Publication Version.
Policy approach should promote 'suburban living' as well as urban living to reflect those parts of North Bristol with a suburban character. Areas such as Westbury Park, Henleaze, Westbury on Trym, Sneyd Park, Stoke Bishop and Henbury should remain leafy suburbs.	Ensuring new development addresses important local character and distinctiveness will be covered by a number of Local Plan Publication Version policies in the 'Design and conservation' chapter.
Concern at potential negative impacts on onstreet parking issues, as well as whether existing community facilities and supporting infrastructure	 Addressed in various Local Plan Publication Version policies including T2 'Transport infrastructure improvements'; T3A 'Transport development management'; IDC1 'Development contributions and CIL'; and Policy CF1 'Provision of community facilities'.

Main issues raised	How they were addressed
could cope with proposed housing growth.	
 Greater clarity sought on future role of Eastgate Retail Park with policy flexibility needed to allow it to develop and upgrade. 	The Local Plan approach to out of centre retail parks accords with national planning policy.

Draft Policy DS13: Lockleaze

Table 69 - main issues raised on Draft Policy DS13: Lockleaze and how they were addressed in the Local Plan

Main issues raised		How they were addressed
•	Policy should promote green infrastructure, urban food growing and public realm enhancements.	 Draft policy made reference to development including green infrastructure and public realm enhancements and this is maintained in Local Plan Publication Version Policy DS13 'Lockleaze'. Food growing opportunities addressed by Publication Version Policy FS2 'Provision of food growing space in new developments', amongst others.
•	Require 40% affordable housing provision.	 An appropriate level of affordable housing will be secured through the application of Publication Version Policy AH1 'Affordable housing provision'.
•	Greater ambition needed on requirements for new housing to be self/custombuilt and community-led to reflect local high demand. Consider at least 20% of new houses could be delivered in this way. Site allocations should be amended accordingly.	The approach to this issue is covered by Publication Version Policy H5 'Self-build and community-led housing'.
•	Refer to Lockleaze Community Plan (2019 - 2024).	 Draft policy makes reference to work by the local community identifying a number of development opportunities alongside those already allocated in the local plan. This approach has been maintained for Local Plan Publication Version Policy DS13 'Lockleaze' and is considered to provide an appropriate

Main issues raised	How they were addressed
	basis for guiding development proposals in the area alongside other Local Plan policies.
100 dwelling per hectare considered inappropriate. Vistas across Lockleaze, especially from Stoke Park, should not be obscured.	 Publication Version Policy DS13 'Lockleaze' maintains draft policy approach in providing information on potential indicative housing density. This will be supported by Publication Version policies UL1 'Effective and efficient use of land', UL2 'Residential densities' and other relevant policies.
Concern that provision of workspace requirement may affect viability of site development.	 Draft policy considered to be an appropriate approach and maintained in Publication Version Policy DS13 'Lockleaze'. This will be supported by Publication Version Policy E6A 'New workspace within mixed use development'.
Specific transport improvements sought such as new railway station for Lockleaze.	Draft policy makes reference to development being supported by transport improvements including public transport enhancements, cycle provision and pedestrian route improvements and this is maintained in Publication Version Policy DS13 'Lockleaze'. Issue also addressed by Publication Version Policy T2 'Transport infrastructure improvements'.
Enhanced amenities needed to support housing growth such as new shops, cafes, restaurants, libraries, health and education facilities.	 Introductory text to draft policy explained that, as existing housing density in Lockleaze is low, infill development at higher densities can help to support and encourage investment in existing and new supporting facilities. This is maintained in Publication Version Policy DS13 'Lockleaze'.
Policy should cover:	Policy coverage requests:
 retail provision. need to work with South Gloucestershire Council on cross- boundary issues. 	 This issue will be addressed through application of Local Plan Publication Policy SSE1 'Supporting Bristol's Centres - network and hierarchy' and other policies in the 'Centres, shopping, and the evening economy' chapter.

Main issues raised	How they were addressed
	 Not considered necessary to make specific reference to this within the policy.

Draft Policy DS14: Central Southmead

Table 70 - main issues raised on Draft Policy DS14: Central Southmead and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Provision of community facilities should specifically reference a youth support focus.	Not considered necessary to make this specific reference. A more flexible approach is preferred to allow for the type of any community facilities provision to be shaped by local needs at the time proposals are made over the course of the plan period.
Reference to Glencoyne Square providing housing and open space should also refer to provision of community amenities / facilities.	Text has been added to Local Plan Publication Version Policy DS14 'Central Southmead' to refer to the planning permission granted for a mixed-use development at Glencoyne Square in 2021.
Policy should seek provision of improvements to Doncaster Road Park.	 Doncaster Road Park is outside the DS14 'Central Southmead' policy area. Issue of open space provision is addressed by a number of Local Plan Publication Version policies, including Policy GI A 'Open Space for Recreation'.
Reference should be made in policy to urban food growing.	 Food growing opportunities addressed by Publication Version Policy FS2 'Provision of food growing space in new developments', amongst others.

Infrastructure and Developer Contributions

Draft Policy IDC1: Development contributions and CIL

Table 71 - main issues raised on Draft Policy IDC1: Development contributions and CIL and how they were addressed in the Local Plan

Main issues raised	Но	w they were addressed
Reference should	be made •	Not considered necessary as supporting text
to development vi	ability	to policy signposts to Planning Obligations

Main issues raised	How they were addressed
and how that affects whether planning obligations can be provided.	supplementary planning document. This details approach taken to secure contributions where appropriate.
Reference to securing mitigation through planning obligations not in accordance with NPPF. Obligations only to be used where planning conditions cannot address unacceptable impacts.	Draft policy considered to accord with national planning policy and guidance.
Objection to obligations being sought from 'any' development. Not compliant with NPPF for affordable housing obligations where a threshold of development size is set.	Draft policy considered to accord with national planning policy and guidance.
Request for policy to reference Community Asset Transfers and how consultation on these should take place.	 Not considered appropriate for this to be incorporated as relates to matters beyond the determination of planning applications. Information on Community Asset Transfers provided on BCC website.
Specific references sought	Specific references sought:
to: o replacement of	 Addressed in Local Plan Publication Version Policy BG4 'Trees'.
trees through section 106 agreements;	 Not considered necessary to include a specific mention to community facilities and uses in this strategic
 Community facilities and uses should be specifically mentioned in the policy, with reference to the 	policy. Re. social value, Local Plan Publication Version contains Policy SV1 'Social value and inclusion'. This expects all major developments proposals to be accompanied by a social value strategy.
council's Social Value Policy. community infrastructure levy	 This would be considered as part of any review of the Community Infrastructure Levy.
containing a	

Main issues raised	How they were addressed
biodiversity or nature recovery strand.	
Sport England felt all new dwellings should provide new or enhanced sport and recreation facilities.	 The provision of new or enhanced sport and recreation facilities will be secured where appropriate using Local Plan Publication Version policies IDC1 'Development contributions and CIL', CF1 'Provision of community facilities' and CF2 'Retention of community facilities'.
Natural England sought reference to green infrastructure, particularly the strategic approach to mitigating effects on sites of European importance for nature conservation.	 Not considered necessary to specifically reference green infrastructure within this strategic policy. Local Plan Publication Version Policy BG1 'Green Infrastructure and biodiversity in new development' sets out the council's expectations for the provision of green infrastructure in new development.
Environment Agency considered provision of flood risk management infrastructure should be referenced.	Not considered necessary to specifically reference flood risk management infrastructure within this strategic policy. Local Plan Publication Version Policy FR1 'Flood risk and water management' sets out the council's approach to the provision of on- and off-site flood risk mitigation measures where appropriate. Policy FR2 'Bristol Avon Flood Strategy' seeks to ensure relevant development proposals contribute to the implementation of that strategy through their design or financial contributions.

Urban Living: Making the best use of the city's land

Table 72 - main issues raised on Urban Living: Making the best use of the city's land and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Highways England sought	 Addressed by policies in Transport chapter of
specific policy on provision	Local Plan Publication Version. Parking issues
of parking and approach to	covered in Policy T4A 'Parking, servicing and
on-street parking in vicinity	the provision of infrastructure for electric
of 'Urban Living'	vehicles'. Policy T3A 'Transport development
allocations. They also	management' requires a Transport

requested an assessment
to predict impact of this
approach on local and
strategic highway network

Assessment / Statement to be submitted alongside a planning application where development is likely to have a significant traffic impact.

Draft Policy UL1: Effective and efficient use of land

Table 73 - main issues raised on Draft Policy UL1: Effective and efficient use of land and how they were addressed in the Local Plan

Ma	ain issues raised	How they were addressed
•	Important that housing capacity of urban living sites is realistically assessed to ensure no detrimental impact on residential amenity or character and historic fabric of city.	Approach informed by published Urban Potential Assessment.
•	Policy should recognise mixed use not always appropriate within single buildings.	 Flexibility is provided in Local Plan Publication Version Policy UL1 'Effective and efficient use of land'. In relation to achieving optimum density, the policy makes clear that this may include development of mixed uses within buildings.
•	Policy should include proviso that, when assessing 'optimum density', weight will be given to impacts of proposal on existing population, such as parking issues, access to public and active transport, air quality and open space.	• Issues addressed in other Local Plan Publication Version policies including: Policy DPM1 'Delivering well-designed, inclusive places'; Policy DC1 'Liveability in residential development including space standards and private outdoor space'; Policy T1 'Development and transport policies'; Policy T3A 'Transport development management'; Policy T4A 'Parking, servicing and the provision of infrastructure for electric vehicles'; Policy HW2 'Air quality'; Policy BG1 'Green Infrastructure and biodiversity in new development'; and Policy GI A 'Open Space for Recreation'.
•	Specific references sought for inclusion in policy wording: o that previously developed land is a	 Specific references sought: Local Plan Publication Version Policy UL1 'Effective and efficient use of land' provides sufficient clarity on the priority being given to development on previously developed land.

Main issues raised	How they were addressed
priority for development;	 Addressed in policies in the Local Plan Publication Version's 'Net Zero and Climate' chapter.
climate change mitigation in development;	 Addressed in Local Plan Publication Version Policy UL2 'Residential
 higher minimum density for development over 20 units; 	densities'. o Approach applies to all uses.
 employment and retail uses. 	
Policy should consider benefits of integrating ecological functionality and services into new developments so that they provide food production, ecological connectivity, water conservation and related quality of life improvements.	 Addressed in other Local Plan Publication Version policies including policies FS2 'Provision of food growing space in new developments'; BG1 'Green Infrastructure and biodiversity in new development'; and NZC1 'Climate change, sustainable design and construction'.
Concern that Diagram 6.1 lacks clarity for defining different density level boundaries.	Diagram 6.1 shows indicative locations where more intensive forms of development will be expected on suitable sites. In conjunction with the policy wording and supporting text, it is considered that the diagram provides sufficient clarity for informing development proposals.
 400m walking distance parameter too restrictive; 800m a suggested alternative as per Manual for Streets. 	400m considered to be an appropriate distance for the purposes of this policy.

Draft Policy UL2: Residential densities

Table 74 - main issues raised on Draft Policy UL2: Residential densities and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Policy should include	 Addressed in introductory text to policy
reference to 'liveability' to	which signposts to other supporting policies

Main issues raised	How they were addressed
make clear optimisation is balance between liveability and density.	in the Local Plan relating to liveability and design.
More flexibility needed in policy to ensure all schemes will be considered on a case-by-case basis.	 Supporting text to the policy makes clear that not all sites will be suitable for higher density forms of development. All relevant Local Plan policies and guidance will be used to determine the appropriateness of individual proposals.
Policy should include proviso that, when assessing 'optimum density', weight will be given to impacts of proposal on existing population, such as parking issues, access to public and active transport, air quality and open space.	 Issues addressed in other Local Plan Publication Version policies including: Policy DPM1 'Delivering well-designed, inclusive places'; Policy DC1 'Liveability in residential development including space standards and private outdoor space'; Policy T1 'Development and transport policies'; Policy T3A 'Transport development management'; Policy T4A 'Parking, servicing and the provision of infrastructure for electric vehicles'; Policy HW2 'Air quality'; Policy BG1 'Green Infrastructure and biodiversity in new development'; and Policy GI A 'Open Space for Recreation'.
Clarity sought on reference to 'safeguarding the special interest and character of the area.' Does this mean Conservation Areas? Concern that policy should not attempt to provide statutory protection to areas not designated as heritage assets.	Aim of policy is ensure development proposals optimise the efficient use of land through encouraging higher density residential development in appropriate locations. Reference to 'safeguarding the special interest and character of the area' seeks to ensure that an appropriate density is achieved having regard to the context of the application site and would include Conservation Areas.
Concern that minimum net density of 50 dwellings per hectare too low to meet housing need.	50 dwellings per hectare considered to be an appropriate minimum. Supporting text to the policy makes clear that higher densities will be sought where this would be consistent with site considerations and other Local Plan policies.
Density higher than 200 dph for city centre suggested, e.g. 300 or a	200 dwellings per hectare for city centre proposals considered to be an appropriate minimum.

Ma	ain issues raised	How they were addressed
	statement included of an expectation that minimum threshold will be exceeded.	
•	Three policy areas identified considered too broad.	The three areas are considered appropriate in seeking to secure higher density residential development in locations most suitable to accommodate it. This is due to their relatively good accessibility by sustainable transport modes to employment opportunities, services and other facilities.
•	Setting of minimum densities contrary to concept of optimising density, which should be based on site specific issues and good design.	Supporting text to the policy makes clear that higher densities will be sought where this would be consistent with site considerations and other Local Plan policies. This would include the suite of design policies set out in the Local Plan Publication Version.

Housing

Draft Policy H1: Delivery of new homes

Table 75 - main issues raised on Draft Policy H1: Delivery of new homes and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Housing target too low. Does not reflect assessed need.	 Appropriate target set out in Local Plan Publication Version Policy H1 'Delivery of new homes – Bristol's housing requirement' based on appropriate assessment of need and capacity.
 Allocate additional residential development sites to ensure a 5-year housing land supply. 	 Local Plan Publication Version contains a range of policy approaches to ensure identified housing need is delivered and exceeded.
Include reference to a policy review period.	 Local Plan Publication Version includes commitment to review the plan within 5 years of adoption with a particular focus on housing needs and delivery.
Concerns about infrastructure and environment impacts	 Adequate infrastructure to support new development addressed by Local Plan Publication Version Policy IDC1

Main issues raised	How they were addressed		
resulting from housing requirement and ambition to exceed it.	'Development contributions and CIL'. Environmental impacts covered by various policies in the Publication Version's Green Infrastructure and Biodiversity, Net Zero and Carbon Health chapters, amongst others.		
 Include flexibility to reflect Joint Spatial Plan examination outcome. 	Joint Spatial Plan withdrawn in 2020.		
 Insufficient reference to specific housing types. 	 Addressed in Local Plan Publication Version Policy H4 'Housing type and mix'. 		

Providing affordable homes

Main issues raised	How they were addressed	
Objection to lack of specific policy as creates uncertainty.	 Policy introduced for 2022 consultation and Publication Version following 2020 withdrawal of Joint Spatial Plan. 	
 Lack of viability testing of Joint Spatial Plan policy. 	Joint Spatial Plan withdrawn in 2020.	
 Amend definition of affordable housing to reflect revised NPPF. 	Definition provided in Local Plan Publication Version Policy AH1 'Affordable housing provision' which reflects the NPPF.	

Draft Policy H2: Preventing the loss of residential accommodation

Table 76 - main issues raised on Draft Policy H2: Preventing the loss of residential accommodation and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Strengthen approach to prevent loss of family and key worker housing to: 	Draft policy considered appropriate and maintained for Local Plan Publication Version.
Short-term lets (such as Airbnbs);	
Student accommodation.	

Draft Policy H3: Making the best use of site allocations

Table 77 - main issues raised on Draft Policy H3: Making the best use of site allocations and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
Concern that aim to 'exceed' or 'be consistent with minimum density' should not override considerations of whether schemes will create sustainable, well-balanced and supportive communities.	Draft policy not taken forward to 2022 consultation document or Local Plan Publication Version.	
Clarification sought on:		
 Whether Growth and Regeneration Areas can be considered as allocations; 		
 Definition of 'overriding need' and 'essential community facilities'. 		

Draft Policy H4: Housing type and mix

Table 78 - main issues raised on Draft Policy H4: Housing type and mix and how they were addressed in the Local Plan

Ma	ain issues raised	How they were addressed		
•	Policy should strengthen its focus on restoring balanced, mixed communities by addressing areas with existing excess concentrations of one dwelling type (e.g. student accommodation).	Draft policy adequately addressed this by its requirement that development should have regard to the need to redress any harmful housing imbalance that exists in an area. This approach maintained for Local Plan Publication Version Policy H4 'Housing type and mix'.		
•	Implementation of policy:	Implementation of policy:		
	 Consider using a 'housing types target' of what constitutes a 	 Draft policy provided appropriate, proportionate and sufficiently flexible approach which reflected national planning policy and evidence of local need. Approach maintained for Local Plan Publication Version Policy H4. 		

Main issues raised	How they were addressed
balanced community;	
 Flexible approach without specific targets is needed to reflect individual site circumstances. 	
 Appropriate mix should be based on response to market signals within area; 	
 Securing appropriate mix needs underpinning by empirical evidence of need and type in different parts of city; 	
 Clarify definition of 'balanced community'. 	
Re. references to having regard to 'existing housing profile' and redressing 'harmful housing imbalance that exists' in the area, unclear whether policy is expecting development to conform to existing profile of area or vary it.	It is considered that the references can be readily understood and allow for an appropriate assessment to be made of a proposal's suitability.
 Query as to how appropriate mix will be determined in growth and regeneration areas with little existing residential development (e.g. St Philip's Marsh). 	Through supporting documentation planning applicants can explain how their proposal reflects the policy's requirements. This will then be assessed by the decision maker.

Draft Policy H5: Self-build and community-led housing

Table 79 - main issues raised on Draft Policy H5: Self-build and community-led housing and how they were addressed in the Local Plan

Main issues raised	How they were addressed		
More allocations requested.	Three sites are allocated for self-build, custom housebuilding and community-led housing in Local Plan Publication Version Policy H5 'Self-build and community-led housing'. In addition, supporting text explains that the council is working with community organisations to deliver community-led housing on seven other sites.		
5% target for Green Belt allocation sites should be increased.	 Draft policy percentage considered appropriate and maintained in Publication Version Policy H5. 		
Lack of evidence of demand, need or viability to justify policy.	Rationale for policy explained in introductory text. Local Plan Publication Version supported by viability assessment.		
Growth and regeneration	Growth and regeneration areas:		
areas:Clarification needed	 Clarification provided in supporting text to Publication Version Policy H5. 		
on proportions required and justification; Requirement for self-build only where viable and deliverable.	 Approach set out in draft policy considered reasonable as reflects identified demand and likely potential of proposals in growth and regeneration areas to accommodate this form of housing. Policy approach maintained for Publication Version Policy H5. 		
Affordable housing:	Affordable housing:		
 Objection to proposed approach as would mean community-led housing will not be sufficiently affordable for all members of the community; 	 Draft policy has been amended for Publication Version Policy H5 to explain the circumstances where affordable housing will be sought for community-led, self-build and / or custom housebuilding proposals. 		
 South Gloucestershire Council considered affordable housing should be 			

Main issues raised	How they were addressed
encouraged.	
• Exception sites:	• Exception sites:
 Concern at how 'demonstrable support by local community' would be evidenced and what the threshold will be for 'deficiency of open space'. Policy should go 	O It is considered that the term 'demonstrable support by local community' provides useful flexibility to enable the decision maker to make an appropriate assessment of a proposal's suitability. Deficiencies of open space will be assessed with reference to Local Plan Publication Version Policy GI A 'Open Space for Recreation'.
further with exception approach applied to any site.	 Draft policy approach considered proportionate and reasonable, reflecting identified demand for community-led housing. It has been maintained for Publication Version Policy H5.

Draft Policy H6: Homes in multiple occupation and other shared housing

Table 80 - main issues raised on Draft Policy H6: Homes in multiple occupation and other shared housing and how they were addressed in the Local Plan

Main issues raised		How they were addressed	
•	More restrictive approach needed as well as more focus on addressing existing HMO concentrations.	•	Draft policy sought to ensure appropriate balance between provision of HMOs and avoiding a local imbalance of such uses. This is considered reasonable and proportionate. Approach maintained for Local Plan Publication Version Policy H6 'Houses in multiple occupation and other shared housing'.
•	Approach undervalues HMOs importance, particularly in providing affordable accommodation.	•	Positive contribution that HMOs can make to choice and affordability of housing is reflected in introductory text to Publication Version Policy H6.
•	Policy should avoid negative framing of all HMO development and instead use positively	•	It is considered that the draft policy achieved the aim of supporting proposals for HMOs provided a local imbalance of such uses are avoided. Approach maintained in Publication

Main issues raised	How they were addressed	
worded criteria to assess proposals including attainable rents, well-managed by a Registered Provider, approx. 5 bedrooms, and new builds that achieve high design standards.	Version Policy H6.	
 More clarity sought on meaning of 'harm to amenity and character' and 'exacerbation of harmful conditions'. 	 It is considered that the draft policy provided sufficient clarity on these terms both in the policy wording and supporting text. This has been maintained in Publication Version Policy H6. 	
Avoiding harmful concentrations:	 Avoiding harmful concentrations: The draft policy was considered reasonable and justified in its introductory text and is supported by the 'Managing the development of houses in multiple occupation' Supplementary Planning Document. This approach has been maintained in Publication Version Policy H6. Local Plan Publication Version supported by viability assessment. 	

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

Table 81 - main issues raised on Draft Policy H7: Managing the development of purpose-built student accommodation and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
University of Bristol sought removal of reference to indicative bedspace capacities. Policy text should instead confirm that purpose-built student accommodation proposals which individually or cumulatively exceed thresholds will be	 Draft policy approach to bed space limits considered appropriate and maintained in Local Plan Publication Version Policy H7 'Managing the development of purpose-built student accommodation' subject to an amendment allowing bed space limits to be exceeded in specified circumstances. 	

Main issues raised		How they were addressed	
	acceptable if they comply with general requirements set out in the policy.		
•	Flexibility needed to ensure policy can adapt to any policy or strategy changes affecting growth in student numbers.	•	Local Plan will be reviewed within five years of its adoption. This review will be informed by results of the on-going monitoring of the supply of bed spaces against projected student accommodation needs within Bristol, as explained in supporting text added to Publication Version Policy H7.
•	Potential inconsistency between number of bed spaces in policy (7,500) exceeding the 6,400 stated additional bedspaces required by University of Bristol.	•	Bedspace numbers have been updated for Publication Version Policy H7 to reflect the latest student growth projections for the revised 2025-2040 plan period of the Local Plan.
•	Policy should reference current shortfall in high quality purpose-built student accommodation in Bristol.	•	Draft policy provided a positive approach to addressing the accommodation needs of the city's growing student population in a sustainable manner. This approach has been maintained for Publication Version Policy H7.
•	Evidence base for capped figures in defined locations should be published and referenced within policy or supporting text.	•	Bedspace numbers have been updated for Publication Version Policy H7 to reflect the latest student growth projections for the revised 2025-2040 plan period of the Local Plan. Figures provided for specified locations based on assessment of appropriate capacities.
•	Additional reference sought to management of purpose-built student accommodation.	•	Additional text added to Publication Version Policy H7 to make clear that all purpose-built student accommodation proposals will be expected to be subject to an appropriate management regime set out in an approved management plan.
•	Reference to proposals requiring support of University of Bristol: o considered onerous and unfair;	•	Publication Version Policy H7 amended to require purpose-built student accommodation proposals to have support of relevant higher education provider when larger scale development is proposed.

Main issues raised	How they were addressed
 University of the West of England thought policy should refer to support from one or more higher education institution being taken into account in the determination of planning applications, rather than being an explicit requirement. 	
 Defined locations and capping of bedspaces: 	Defined locations and capping of bedspaces:
 Unclear how locations have been identified and caps set. 	 Locations identified based on assessment of suitability and bed space levels set based on assessment of appropriate bed space density.
 Concern approach may be overly restrictive and counter-productive to other policy aims, e.g. uncapped student accommodation in Bristol Shopping Quarter and Frome Gateway could add to their vitality. Caps should be referred to as 	 Draft policy considered to achieve an appropriate balance between meeting the accommodation needs of the city's growing student population and ensuring adverse effects on existing communities are avoided. Approach maintained for Publication Version Policy H7. Approach to bedspace caps considered appropriate for reasons explained in above bullet point and introductory text to policy.
indicative capacities or removed.	
 Defined locations - University of Bristol precinct: 	Defined locations - University of Bristol precinct:
precinct.	 Draft policy considered to achieve an appropriate balance between

Main issues raised	How they were addressed
 Objection to proposed additional bedspaces as existing amount of students considered to be causing harmful impacts. 	meeting the accommodation needs of the city's growing student population and ensuring adverse effects on existing communities are avoided. Approach maintained for Publication Version Policy H7.
Defined locations - Clifton	Defined locations - Clifton campus:
campus: Objection as would not result in a sustainable increase in purpose-built student accommodation.	 Publication Version Policy H7 amended to ensure any additional development brought forward at Clifton residential campus is subject to a comprehensive masterplan and does not give rise to significant additional demand for on-street parking.
Defined locations – Stoke Biokagas	Defined locations – Stoke Bishop:
Objection as would exacerbate existing amenity impacts: parking, highway safety, congestion, character, noise, litter, air pollution and anti-social behaviour. Lack of clarity on where the bedspaces will be built, therefore concern at potential loss of open space and character of local area. Bedspace cap	o Publication Version Policy H7 amended to ensure any additional development brought forward at Stoke Bishop residential campus is subject to a comprehensive masterplan. This would include measures to ensure a sustainable approach to development with no loss of existing on-site parking and any significant increased pressure for on-street parking controlled through specific measures to be agreed with the council.
should be lower.	
 Concern about ability of infrastructure to support growth. 	

Main	issues	raised

- Defined locations Temple Quarter and St Philip's Marsh:
 - Clarity sought on evidence for how number of bedspaces proposed (3,000) was identified. Understood area expected to accommodate 3,500 students.
 - Number too high.
- Defined locations Bristol Shopping Quarter (Broadmead) and Frome Gateway:
 - 500 cap threshold for Frome Gateway inappropriate given developer interest, therefore flexibility needed.
 - Query whether
 Frome Gateway is appropriate location as relatively isolated from University of Bristol, also may have negative impacts on operations of existing commercial uses;
 - Unclear how cap would be implemented, e.g.
 500 bedspaces for each location?

How they were addressed

- Defined locations Temple Quarter and St Philip's Marsh:
 - Bedspace figure has been increased and based on assessment of appropriate bed space density.

- Defined locations Bristol Shopping Quarter (Broadmead) and Frome Gateway:
 - Bedspace figures have been set based on assessment of appropriate bed space density.
 - Location considered suitable given its proximity to city centre and good accessibility by sustainable transport modes to other parts of the city. The area is also subject to Local Plan Publication Version Policy DS5 'Frome Gateway'. This expects development to accord with a regeneration framework which will coordinate the approach to development across the area. This will include an assessment of potential impacts of development proposals on existing uses and occupiers.
 - Publication Version Policy H7 has been amended to separate the two locations and set individual bed space limits.

Ma	ain issues raised	Но	w they were addressed
•	Defined locations – Central Bedminster: o Increase threshold / capacity to 1,350. o Concern that proposals within area already far exceed proposed cap.	•	 Defined locations – Central Bedminster: Bedspace figure has been increased and based on assessment of appropriate bed space density.
•	Defined locations – Western Harbour: O University of the West of England thought Western Harbour area should be expanded to include Bower Ashton Campus as they are reviewing student accommodation provision for their City Campus.	•	 Defined locations – Western Harbour: Proposals for student accommodation in draft policy not taken forward in Publication Version Policy H7.
•	Lack of evidence to support reference to proposals for purpose-built student accommodation that exceed 1000 bed spaces within 200 metres of the site likely to result in harm in commercial areas.	•	Draft policy approach considered appropriate for reasons set out in introductory text. General approach maintained for Publication Version Policy H7 with refinements and clarifications made to assist with application of the policy.
•	Mix of uses:	•	Mix of uses:
	 should be promoted as per previous draft policy ULH6. 		 Publication Version Policy H7 promotes purpose-built student accommodation as part of mixed-use proposals in locations other than those specified in the policy.
	 University of Bristol suggested policy re- wording to expect mixed-uses unless there is evidence to demonstrate it is 		 Draft policy amended for Publication Version Policy H7 to make clear that purpose-built student accommodation should form part of mixed-use

Ma	ain issu	es raised	Но	ow they were addressed
		unviable, impractical or otherwise undesirable on planning grounds.		developments in these locations where feasible and appropriate.
•	wording for the context of the conte	cation sought on ng / terminology: urily residential ct'; 'adverse impact'; ful concentrations'; g residential context'; nercial areas'; 'good ard of umodation' and unding communities'.	•	Amendments made to Publication Version Policy H7 to clarify policy wording and explanatory text.
•		able student housing ement:	•	Affordable student housing requirement:
	0	Unclear whether requirement applies to 'other locations' as well as 'defined locations'. Lack of evidence, and viability-testing to justify approach and target as appropriate. 30% target should be increased to 50%. University of the West of England		 Draft policy considered sufficiently clear through its reference to affordable student housing requirement applying to the 'above' locations, i.e. those specified in the preceding part of the policy. This has been maintained for Publication Version Policy H7. Draft policy approach and target considered appropriate with reasoning provided in supporting text. Approach maintained for Publication Version Policy H7. Local Plan Publication Version supported by viability assessment.
		considered 30% requirement overly prescriptive. They also thought it likely to impact viability, as did University of Bristol. They favoured a flexible approach undertaken on a		

Main issues raised	How they were addressed
case-by-case basis which assessed evidenced need, with the support of the University (or other establishment) an important factor in assessing whether the proposal effectively addresses identified need.	
South Gloucestershire Council thought lack of areas identified for University of the West of England student accommodation development meant potential increased student housing pressure in areas of South Gloucestershire. SGC sought joint work with BCC to develop a complementary approach.	 Publication Version Policy H7 provides an appropriate approach to the provision of purpose-built student accommodation informed by an assessment of the projected growth of student numbers to 2040. The Local Plan will be reviewed within five years of its adoption. This review will be informed by results of the on-going monitoring of the supply of bed spaces against projected student accommodation needs within Bristol, as explained in supporting text to Publication Version Policy H7.

Draft Policy H8: Older peoples' and other specialist needs housing

Table 82 - main issues raised on Draft Policy H8: Older peoples' and other specialist needs housing and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 References to 60 dwellings or more and a minimum of 10% affordable specialist housing: Lack of evidence and viability-testing to justify approach. More flexibility needed for sitespecific 	Amendments made to Local Plan Publication Version Policy H8 'Older people's and other specialised needs housing' to make clear that the 10% contribution will be sought from only extra care housing or housing-with-care schemes of the relevant size. Where, for reasons of viability, the applicant considers that the minimum percentage cannot be achieved, text has also been added to expect the applicant to demonstrate whether particular circumstances justify the need for a viability

Main issu	es raised	How they were addressed
	circumstances where 10% affordable unviable.	assessment and provide full development appraisals to evidence an alternative affordable housing provision.
0	Provision of alternative housing types should be allowed where not viable to provide affordable housing.	Explanatory text has also been added to set out the circumstances where a financial contribution in lieu of on-site provision may be appropriate. Local Plan Publication Version supported by viability assessment.
0	Rationale for affordable housing provision should be same as for other types of housing;	
0	Concern about lack of clarity on what constitutes affordable accommodation and practicalities of managing the affordable units.	

Draft Policy H9: Accessible homes

Table 83 - main issues raised on Draft Policy H9: Accessible homes and how they were addressed in the Local Plan

Ma	in issues raised	How they were addressed
•	Lack of viability-testing and evidence to justify approach on optional standards and how 10% and 100% targets have been reached. Revise policy to reflect Government's Planning Practice Guidance that Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the Local Authority	Draft policy approach considered appropriate for reasons set out in its introductory text and based on latest evidence of need. General approach maintained for Local Plan Publication Version Policy H9 'Accessible homes' with updates reflecting the Government's Planning Practice Guidance. Local Plan Publication Version supported by viability assessment.

Main issues raised	How they were addressed
is responsible for allocating or nominating a person to live in that dwelling.	
 More flexible approach needed to address individual site circumstances / constraints. 	

Draft Policy H10: Planning for traveller sites

Table 84 - main issues raised on Draft Policy H10: Planning for traveller sites and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Appropriate locations for plots or pitches should exclude Local Green Space, Reserved Open Space and the grounds and setting of historic buildings.	 Provisions of draft policy considered suitable for ensuring the appropriate assessment of proposals and these have been maintained for Local Plan Publication Version Policy H10 'Planning for traveller sites'. All other relevant development plan policies and considerations will also apply to the assessment of proposals.
Policy should be extended to include assessment of van-dwellers needs.	 Draft policy considered to be in accordance with national planning policy. Approach maintained for Publication Version Policy H10.
South Gloucestershire Council thought greater regard should be given to National Planning Policy for Travellers Sites and its aim that current and future needs should be met.	Draft policy considered to be in accordance with national planning policy. Approach maintained for Publication Version Policy H10.
Environment Agency thought policy should refer to avoiding areas of flood risk.	Provisions of draft policy were considered suitable for ensuring the appropriate assessment of proposals and these have been maintained for Publication Version Policy H10. All other relevant development plan policies and considerations will also apply to the assessment of proposals.

Economy

Table 85 - main issues raised on Economy and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Objection to downgrading of employment provision in South Bristol as mixed-use development not considered to guarantee new employment provision.	 Local Plan Publication Version E2 'Economic development land strategy' explains that South Bristol will remain a priority focus for development and regeneration. Around 150 hectares of land will continue to be reserved for industry across eighteen industry and distribution areas. New land is proposed for industry and warehousing at Vale Lane, while new workspace will also be created in the areas of growth and regeneration and as part of mixed-use development on development allocations.
 Lack of evidence base to justify employment land approach. 	 Local Plan Publication Version E2 'Economic development land strategy' informed by published evidence.
Objection to lack of policy similar to existing Policy DM12 which deals with proposals resulting in loss of employment floorspace outside of designated industrial areas.	 Policy DM12 approach not being taken forward in Local Plan Publication Version. Instead, its policies seek to secure sustainable economic and inclusive growth through allocation of new workspace (Policy E2 'Economic development land strategy'), retention of core industrial land (Policy E5 'Industry and Distribution Areas') and provision of new and affordable workspace as part of new and mixed-use development proposals (policies E6A 'New workspace within mixed use development' and E6 'Affordable workspace').
Economic importance of Bristol Airport insufficiently referenced.	 Airport not located within administrative area of Bristol City Council.

Draft Policy E1: Inclusive economic development

Table 86 - main issues raised on Draft Policy E1: Inclusive economic development and how they were addressed in the Local Plan

Ma	ain issues raised	How they were addressed
•	Concern about impacts on development viability.	 Local Plan Publication Version supported by viability assessment.
•	No targets for employment land provision.	 Targets included in Local Plan Publication Version Policy E2 'Economic development land strategy'.
•	More clarity needed for policy implementation.	 Addressed with additional text added to explanatory text of Local Plan Publication Version Policy E1 'Inclusive economic development'.
•	Lack of policy on tourism.	 Tourism addressed in various Local Plan Publication Version policies including the
•	Development thresholds at which policy would apply:	 Thresholds amended for Local Plan Publication Version Policy E1. Considered
	 No evidence to justify them. 	appropriate for reasons set out in supporting text to policy. Also reflects the council's guidance 'Delivering Employment and Skills
	 Too onerous and wide ranging. 	through Development – a guide for applicants and developers'.
	 Should only apply to major or super- major development. 	

Draft Policy E2: Employment land strategy

Table 87 - main issues raised on Draft Policy E2: Employment land strategy and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Inadequate employment land provision for South Bristol.	 Local Plan Publication Version E2 'Economic development land strategy' explains that South Bristol will remain a priority focus for development and regeneration. Around 150 hectares of land will continue to be reserved for industry across eighteen industry and distribution areas. New land is proposed for industry and warehousing at Vale Lane, while new workspace will also be created in the areas of growth and regeneration and as

Main issues raised	How they were addressed
	part of mixed-use development on development allocations.
Employment land targets needed.	Strategic policy approach to the scale and location of new workspace to be delivered over the plan period set out in Publication Version Policy E2 'Economic development land strategy'.
 Requirement to provide workspaces within mixed- use developments could lead to unviable development in areas lacking demand. 	Approach considered reasonable for reasons set out in draft policy. Approach maintained for Publication Version Policy E2.
Lack of evidence to support policy.	 Scale and location of new workspace to be delivered over the plan period set out in Publication Version Policy E2 'Economic development land strategy', which is supported by published evidence.
No reference to Bristol Airport.	Airport not located within administrative area of Bristol City Council.
Set targets for amount of workspace to be provided on each Industry and Distribution Area through mixed-use development	 Not considered necessary to set such targets as appropriate provision will depend on a number of factors including site specific considerations.
 Concern over loss of existing Principal Industrial and Warehousing Areas (PIWAs) and potential negative economic implications. 	Aim of Publication Version Policy E2 is to secure sustainable and inclusive economic growth through the development of new workspace and retention of core industrial land.
Concern that approach may favour higher-skilled employment over lower- skilled.	 Draft policy promoted a diversity of workspace types in different locations across the city. This is expected to lead to a wide variety of employment opportunities. Approach maintained for Publication Version Policy E2.
Considered inappropriate for industry to re-locate to Avonmouth due to lack of sustainable and low-cost	Publication Version Policy E2 refers to the substantial amount (237 hectares) of Industrial and Distribution Areas which are proposed to be reserved for industry in areas

Main issues raised	How they were addressed
transport.	outside of Avonmouth. Therefore it is not accepted that industry will have to re-locate to Avonmouth.
Identify Broadmead for new workspace and office development.	This is considered to be addressed with the reference in Publication Version Policy E2 to office and other main town centre workspace uses being focussed on the city centre.

Draft Policy E3: Location of office development

Table 88 - main issues raised on Draft Policy E3: Location of office development and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Set targets for office floorspace.	 Target set out in Local Plan Publication Version Policy E2 'Economic development land strategy'.
Definition of office space needed.	Provided in supporting text to policy.
General need for South Bristol employment workspace.	• Local Plan Publication Version policies in the 'Economy and inclusive growth' chapter provide appropriate references to South Bristol as a priority focus for development and regeneration, for example within the explanatory text of Policy E2. Around 150 hectares of land will continue to be reserved for industry across eighteen industry and distribution areas. New land is proposed for industry and warehousing at Vale Lane, while new workspace will also be created in the areas of growth and regeneration and as part of mixed-use development on development allocations.
Identify Broadmead for new workspace and office development.	This is considered to be addressed with the reference in Publication Version Policy E2 to office and other main town centre workspace uses being focussed on the city centre.

Draft Policy E4: Industry and Distribution Areas

Table 89 - main issues raised on Draft Policy E4: Industry and Distribution Areas and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Concern that policy erodes protection for employment areas.	Draft policy explains that the areas identified represent the core provision of industrial and distribution land outside Avonmouth. Approach maintained for Local Plan Publication Version Policy E5 'Industry and Distribution Areas'.
Policy should recognise opportunities within Industry and Distribution Areas for mixed-use development.	Publication Version Policy E5 identifies these areas as being of strategic economic importance. They are therefore reserved for industry and other uses referred to in the policy.
 Concern about proposal to remove designation as a protected industrial location for the area which includes Lawrence Hill bus depot. 	Local Plan Publication Version policies DS6 'Lawrence Hill' and T2A 'Protected transport and movement routes' make clear that bus depots should be retained unless demonstrated that they are no longer required.
 Proposed designation of Barton Hill Trading Estate considered too restrictive over types of uses. 	Area designated due to its strategic economic importance. Publication Version Policy E5 provides for a wide variety of business uses that would be appropriate in these locations.
 Amend Hawkfield Business Park boundary to reflect latest development activity. 	Boundary amended for Publication Version.
Separate Agent of Change policy needed.	 Issue addressed adequately in draft policy. Approach maintained for Publication Version Policy E5 'Industry and Distribution Areas'.

Draft Policy E5: Avonmouth Industrial Area and Bristol Port

Table 90 - main issues raised on Draft Policy E5: Avonmouth Industrial Area and Bristol Port and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Lack of recognition of Bristol Port's importance.	Addressed in amended text to Local Plan Publication Version Policy E4 'Avonmouth Industrial Area and Bristol Port'.
Further consideration needed on suitability of Avonmouth for small to medium sized businesses, given dominance of large scale distribution operations.	Publication Version Policy E4 supportive of wide range of business sizes and types.
 Remove designation from strip of land adjacent to railway line and Portview Road. 	Designation considered appropriate.

Draft Policy E6: Protecting living conditions in Avonmouth village

Table 91 - main issues raised on Draft Policy E6: Protecting living conditions in Avonmouth village and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Lack of evidence to justify policy.	 Draft proposal not taken forward. Local Plan Publication Version contains a number of policies which will ensure potential harmful impacts of development proposals are adequately considered and addressed. These include policies HW1 'Pollution control and water quality', HW2 'Air quality', HW1A 'Noise' and HW1B 'Contaminated land'.

Draft Policy E7: New workspace within mixed use development

Table 92 - main issues raised on Draft Policy E7: New workspace within mixed use development and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Clarity sought on: amount and type of workspace to be provided. 	 Additional text provided in Publication Version Policy E6A 'New workspace within mixed use development'.
whether policy applies in Growth	

Main issues raised	How they were addressed
and Regeneration Areas.	
relationship between it and related policies.	
Include reference to live / work space.	 Not considered necessary to make specific reference as focus of Publication Version Policy E6A is on workspace provision within mixed use development.
 Provision of new workspace may not be viable in areas of low demand for such space. 	 Publication Version Policy E6A is considered to have an adequately justified approach to the redevelopment of brownfield sites for reasons set out in its supporting text.
Lack of evidence to justify development size threshold to which policy will apply.	 Thresholds in draft policy considered reasonable. Approach maintained for Publication Version Policy E6A.
New workspace required in South Bristol.	 Local Plan Publication Version Policies in this chapter provide appropriate references to South Bristol as a priority focus for development and regeneration, for example within the supporting text to Policy E2 'Economic development land strategy'.

Draft Policy E8: Digital connectivity and inclusion

Table 93 - main issues raised on Draft Policy E8: Digital connectivity and inclusion and how they were addressed in the Local Plan

M	ain issues raised	How they were addressed
•	Concern that policy expectations might not be achievable for all development without affecting its viability.	 Approach considered appropriate for reasons set out in supporting text to draft policy. Approach maintained for Local Plan Publication Version Policy E8 'Digital connectivity and inclusion'.
•	Clarify size of development policy applies to.	Policy considered clear.
•	Requirement for Connectivity Statements considered onerous as issue can be addressed	Connectivity Statements can be included within Planning Statements.

Main issues raised	How they were addressed
through Planning Statements.	

Retained policies

Table 94 - main issues raised on Retained policies and how they were addressed in the Local Plan

Main issu	es raised	How they were addressed
hospi	11 'University and tal development': Suggest similar policy provision to cover Bower Ashton campus. Should be expanded to offer greater flexibility in enabling the development of educational and ancillary uses associated with the University of Bristol.	 BCAP11: Planning applications for development at Bower Ashton Campus will be assessed against all relevant development plan policies and other considerations. Approach to development in this location covered in Local Plan Publication Version Policy DS1 'Bristo City Centre'.
temp	12 'Vacant sites and orary uses': Extend beyond city centre.	 Addressed in Local Plan Publication Version Policy SSE5 'Temporary uses in centres'.

Shopping, Services and the Evening Economy

Table 95 - main issues raised on Shopping, Services and the Evening Economy and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Objection to lack of amended / new shopping areas / retail centres policies given rapid retail market changes.	 New centres have been added to the Local Plan Publication Version; Policy SSE1 'Supporting Bristol's Centres - network and hierarchy' refers.
More recognition needed on importance of local retail particularly for its	 Importance of local retail centres set out in Local Plan Publication Version policies SSE1 'Supporting Bristol's Centres - network and

Main issues raised	How they were addressed
accessibility benefits, with Stokes Croft area emphasised.	hierarchy' and SSE2 'Development in Bristol's centres'. Approach to Stokes Croft addressed in Policy SSE2. This sets out that the emphasis of new development in this location will be on retaining a mix of uses to maintain its character and sustainability.
Any proposed new centre and primary shopping boundaries should reflect recent planning permissions, with Broadwalk Shopping Centre redevelopment scheme referenced.	New centres and primary shopping area boundaries are set out in Publication Version policies SSE1 'Supporting Bristol's Centres - network and hierarchy' and are based on appropriate assessment of their suitability.
 Important that retained policies list after Policy DM8 (Shopping Areas and Frontages) continues to reference Policy Advice Note 8 (PAN8) "Shopfront Guidelines" (1997). 	Reference made in Local Plan Publication Version.

Retained policies

Table 96 - main issues raised on Retained policies and how they were addressed in the Local Plan

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Main issues raised	How they were addressed
BCS7 'Centres and Retailing': change to retail policies requested including consideration of role of Eastgate Retail Park.	BCS7 replaced by Local Plan Publication Policy SSE1 'Supporting Bristol's Centres - network and hierarchy' and other policies within the 'Centres, shopping, and the evening economy' chapter. The Local Plan approach to out of centre retail parks accords with national planning policy.
DM7 'Town Centre Uses': amend policy to reflect economic reality and be supportive of potential conversions away from retail on the fringes of secondary retail areas.	 DM7 replaced by Local Plan Publication policies SSE1 'Supporting Bristol's Centres - network and hierarchy', SSE2 'Development in Bristol's centres' and SSE4 'Town centre first approach to development'.

Mai	Main issues raised		How they were addressed	
	DM8 'Shopping Areas and Frontages': amend policy to reflect economic reality and be supportive of potential conversions away from retail on the fringes of secondary retail areas / a more flexible mix of uses.	•	DM8 replaced by Local Plan Publication policies SSE1 'Supporting Bristol's Centres - network and hierarchy', SSE2 'Development in Bristol's centres' and SSE4 'Town centre first approach to development'.	
	DM9 'Local Centres': concern about impact of advertising on local economic development.	•	Addressed by Local Plan Publication Version Policy AD1 'Advertisements'.	
	BCAP13 'Strategy for retail development in Bristol City Centre': update evidence.	•	Updated approach set out in Local Plan Publication Version policies DS1 'Bristol City Centre' and DS1A 'Bristol City Centre – Broadmead, Castle Park and the Old City', supported by policies in the Publication Version's 'Centres, shopping, and the evening economy' chapter.	
	BCAP14 'Location of larger retail development in Bristol City Centre': update evidence.	•	Updated approach set out in Local Plan Publication Version policies DS1 'Bristol City Centre' and DS1A 'Bristol City Centre – Broadmead, Castle Park and the Old City', supported by policies in the Publication Version's 'Centres, shopping, and the evening economy' chapter.	

Green Infrastructure

Table 97 - main issues raised on Green Infrastructure and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Overall proportion of protected green space should increase as housing and population density increases.	2019 consultation identified that a fifth of the city's land area is given over to various forms of open space and that this overall proportion would be maintained in the Local Plan Review. This is the approach of the Local Plan Publication Version and is considered appropriate given the other aims and objectives of the plan, particularly

Main issues raised	How they were addressed
	around meeting the city's strategic development needs.
References should be made to wider role / benefits of Green Infrastructure, e.g. health and wellbeing, supporting wildlife, protecting townscape character, climate change and flood risk mitigation, improving air quality and protecting trees and woodland areas.	Policies addressing these issues were developed for the 2022 consultation and Local Plan Publication Version, for example within the 'Biodiversity and Green Infrastructure', 'Net zero and climate' and 'Design and conservation' chapters.
Protection of garden land.	 Addressed in Local Plan Publication Version Policy BG6 'Development of Private Gardens'.
References needed to blue infrastructure.	 References added to relevant sections of 2022 consultation and Local Plan Publication Version, including its 'Biodiversity and Green Infrastructure' chapter.
Tree canopy protection and enhancement.	Addressed in 2022 consultation and Local Plan Publication Version Policy BG4 'Trees'.
Natural England considered	Natural England comments:
that: o Green Infrastructure	 Policies were updated for the 2022 consultation and included in Local Plan Publication Version.
policies needed updating to reflect local and national ambitions, including the NPPF and 25 Year Environment Plan such as references to biodiversity net gain.	 Standards for green infrastructure provision included in Local Plan Publication Version Policy BG1 'Green Infrastructure and biodiversity'. These relate to Natural England's Green Infrastructure Standards, part of its Green Infrastructure Framework launched in January 2023.
o Green Infrastructure	 Specific reference made to nature recovery network made in Local Plan Publication Version Policy BG1 'Green Infrastructure and biodiversity in new

Main issues raised	How they were addressed
standards should be included.	development'.
 Consideration be given to the evolving West of England work around nature recovery. 	
Environment Agency sought reference to preserving the floodplain / making space for water.	Suitable references included in policies consulted on in 2022 and in Local Plan Publication Version Policy BG1 'Green Infrastructure and biodiversity in new development'.

Draft Policy GI1: Local Green Space

Table 98 - main issues raised on Draft Policy GI1: Local Green Space and how they were addressed in the Local Plan

Ma	ain issues raised	How they were addressed
•	Criteria for Local Green Space designation too restrictive and contrary to national planning policy and guidance.	Criteria considered suitable and in accordance with national planning policy.
•	All current and future allotments and smallholdings should be designated as Local Green Space.	 Criteria for Local Green Space designation was set out in draft policy and supporting 'New Protection for Open Space — Consultation' document. Statutory allotments subject to strict protections. Issue also addressed in Local Plan Publication Version Policy FS3 'The protection of existing food growing enterprises and allotments'.
•	Provide more examples of types of ancillary development which may be allowed in Local Green Spaces.	It is considered that sufficient examples were provided in supporting text to the draft policy and these have been maintained for Publication Version Policy GI1 'Local Green Space'.
•	Green space along rivers should be given Local Green Space designation.	 Criteria for Local Green Space designation was set out in draft policy and supporting 'New Protection for Open Space – Consultation' document. Approach has been maintained for Publication Version Policy GI1

Main issues raised	How they were addressed
	'Local Green Space'. Issue also addressed by Publication Version Policy BG5 'Biodiversity and access to Bristol's waterways'.
Due to lack of green space in areas such as Easton and Lawrence Hill, all green space should be designated as Local Green Space unless proven otherwise.	Not appropriate as would be contrary to national planning policy.
 Query why some Green Belt areas are not given Local Green Space designation. 	Both Green Belt and Local Green Space designation applied where appropriate criteria were met.

Draft Policy GI2: Reserved Open Space

Table 99 - main issues raised on Draft Policy GI2: Reserved Open Space and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
Objection as no support for approach found in national planning policy.	 Support for draft policy approach in national planning policy. Approach maintained for Local Plan Publication Version Policy GI2 'Reserved Open Green Space'. 	
Too restrictive approach given proposal to also protect Local Green Spaces and will be harmful to housing supply.	 Justification for approach provided in explanatory text to draft policy. Approach maintained for Publication Version Policy GI2. 	
 Policy wording unclear, e.g. how to demonstrate open space is no longer required. 	 Policy wording considered to be sufficiently clear. 	
Should merge approach so that both Local Green Spaces and Reserved Open Spaces receive similar protection.	 Reasoning for approach provided in introductory text to both draft policies. Approach maintained for Local Plan Publication Version. 	
Allotments should be designated as Local Green Space not Reserved Open Space.	 Criteria for Local Green Space designation was set out in draft policy and supporting 'New Protection for Open Space – Consultation' document. Statutory allotments subject to strict protections. Issue also addressed in Local Plan Publication Version Policy FS3 'The protection of existing food growing enterprises and allotments'. 	

Draft Policy GI3: Incidental Open Spaces

Table 100 - main issues raised on Draft Policy GI3: Incidental Open Spaces and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Lack of clarity on Incidental Open Spaces definition.	Definition considered to be sufficiently clear.
Approach could inhibit housing delivery requirement through optimising density.	 Justification for approach provided in explanatory text to draft policy. Approach maintained for Publication Version Policy GI2.

Main issues raised	How they were addressed
Amend policy to allow development where: proposals would reprovide an appropriate level of open space in line with other policies in the Local Plan.	Draft policy wording considered appropriate and maintained for Publication Version Policy GI2.
 it can be demonstrated that benefit outweighs harm. 	

Draft Policy GI4: Stapleton Allotments and Holdings – Food Growing Local Green Space

Table 101 - main issues raised on Draft Policy GI4: Stapleton Allotments and Holdings – Food Growing Local Green Space and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Extend policy approach to include all allotments and smallholdings. 	 Statutory allotments subject to strict protections. Issue also addressed in Local Plan Publication Version Policy FS3 'The protection of existing food growing enterprises and allotments'.
South Gloucestershire Council noted the site was previously designated to accommodate a Park & Ride scheme for the M32 corridor. They considered a change in designation premature given importance of such a scheme is recognised within the Joint Local Transport Plan in support of the Joint Spatial Plan.	Local Plan Publication Version Policy GI4 'Stapleton Allotments and Holdings – Food Growing Local Green Space' considered appropriate for reasons set out in its supporting text. Any proposals for improvements in the M32 corridor can be considered as part of the Joint Local Transport Plan process.

Food systems

Table 102 - main issues raised on Food systems and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Need for a more comprehensive plan to protect nature-friendly food growing sites.	Detailed coverage of this topic addressed in Local Plan Publication Version policies FS1 'The provision of allotments', FS2 'Provision of food growing space in new developments', Policy FS3 'The protection of existing food growing enterprises and allotments' and GI4 'Stapleton Allotments and Holdings – Food Growing Local Green Space'.

Retained policies

Table 103 - main issues raised on Retained policies and how they were addressed in the Local Plan

Main issues raised	How they were addressed
BCS9: Green Infrastructure: More emphasis needed on increasing tree canopy cover.	Addressed in Local Plan Publication Version Policy BG4 'Trees'.
DM17: Development involving existing green infrastructure: Amendment needed requiring replacement of trees in such a way as to contribute to an overall doubling on site of tree canopy cover by 2046.	 Approach towards aim of extending city's tree canopy cover addressed in Local Plan Publication Version Policy BG4 'Trees'.
 DM19: Development and Nature Conservation: Amend policy approach towards biodiversity and achieving net gain. 	 Addressed in Local Plan Publication Version Policy BG3 'Achieving Biodiversity Gains', amongst others.
DM21: Development of Private Gardens: Strengthen policy wording. Should prevent conversion of gardens to hardstanding or synthetic grass and the loss of garden space to Electric Vehicle charging.	Local Plan Publication Version includes Policy BG6 'Development of Private Gardens'. This maintains the approach of DM21 and is considered appropriate and proportionate. Policy BG1 'Green Infrastructure and biodiversity in new development' expects new development to not include artificial grass within their landscape schemes or as

Main issues raised	How they were addressed
	part of the provision of private or communal open space.
BCAP25: Green infrastructure in city centre developments: Natural England noted this policy requires development to include an element of green infrastructure as integral part of design. They suggested where this was not possible a contribution to Green Infrastructure elsewhere would be justified.	Local Plan Publication Version Policy BG1 'Green Infrastructure and biodiversity' includes standards for green infrastructure provision in new development which relate to Natural England's Green Infrastructure Standards, part of its Green Infrastructure Framework launched in January 2023.

New Protection for Open Space – Consultation

Proposed Local Green Space designation

Table 104 - main issues raised on Proposed Local Green Space designation and how they were addressed in the Local Plan $\,$

Ma	ain issues raised	How they were addressed
•	Wessex Water requested removal of their assets from the site boundaries of a number of sites proposed for designation.	 Amendments made where assets deemed not to be of public value for the purposes of Local Green Space designation. Designation will not affect maintenance work on assets.
•	Amendments sought to boundaries of following sites:	 Designation proposed in consultation considered appropriate.
	New Cut Local Nature Reserve	
	2. Sheep Wood	
	3. Stoke Park Estate	
•	Objection to proposed designation of following sites:	 Designation proposed in consultation considered appropriate.
	 Wickham Glen Open Space 	

Main issues raised	How they were addressed
Fields above Lawrence Weston Moor	
Bedminster Down Common	

Proposed Reserved Open Space designation

Table 105 - main issues raised on Proposed Reserved Open Space designation and how they were addressed in the Local Plan $\,$

Ma	ain i	ssues raised	Но	w they were addressed
Sites proposed for Reserved Open Space designation considered to meet criteria for Local Green Space designation:		•	Amendments made for Local Plan Publication Version to designate sites as Local Green Space.	
	1.	Stoke Lodge		
	2.	Blackswarth Road Wood		
	3.	Elderberry Walk Open Space		
	4.	Crox Bottom Green Space		
	5.	Withywood Park		
	6.	Colston's Field		
	7.	Playground at School Road, Totterdown		
•	Re de me	es proposed for served Open Space signation considered to eet criteria for Local een Space designation:	•	Sites not considered to meet criteria for Local Green Space designation.
	1.	Land at Windsor Place and The Paragon		
	2.	St Werburgh's Park Open Space		
	3.	Land at Maskelyne Avenue		

Main i	ssues raised	How they were addressed
4.	Land to the south of Cornwallis Crescent	
5.	Trym Valley Open Space, Southmead	
6.	May Hassell playing fields	
7.	Railway line north of Lockleaze Road	
8.	Colston School	
9.	Brixham Road Open Space	
10.	Dorian Road Playing Fields	
11.	Grittleton Road Allotments	
12.	Fairfield School Playing Field, Muller Road	
13.	Sir Johns Lane Allotments	
14.	Land at Boiling Wells	
15.	Land at Boiling Wells	
16.	Railway from Easton Road to Muller Road and Ashley Hill	
17.	Ashley Vale Allotments	
18.	Albion Road Amenity Area	
19.	Belle Vue Road Open Space	
20.	Former Wesley College	
21.	Lynmouth Road Allotments	
22.	Open Space at Eaton Crescent	
23.	Bristol and Bath Railway Path	

Main issues raised		Но	w they were addressed
24	. Bristol and Bath Railway Path adjacent to Owen Square Park		
25	5. Highway Land Portway		
26	i. Portway - land between Railway and River		
27	'. Park Place		
28	B. Dowry Square		
29). The Urban Park		
30). South Parade Gardens		
31	Avon View Cemetery		
32	. Filwood Playing Fields		
33	8. Henbury Court Primary School		
34	. Falcondale Road Allotments		
35	i. Westbury-on-Trym C of E Primary School		
36	5. The Coppice Open Space		
ina	es considered appropriate for esignation:	•	Designation proposed in consultation considered appropriate.
1.	Filton Golf club		
2.	Land to the east of Barkleys Hill		
3.	Land to the west of Barkleys Hill		
4.	Vyvyan Terrace		
bc	mendments sought to oundaries of following ses:	•	Designation proposed in consultation considered appropriate.
1.	Grove Road Open Space		
2.	Land Adjoining Tackley Road Garage		

Sites suggested for Local Green Space designation

Table 106 - main issues raised on Sites suggested for Local Green Space designation and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Sites suggested for Local Green Space designation:	Sites considered as not meeting criteria for designation.
 Open Space at Alma Road 	
 Land at Whiteladies Gate, Cotham (BDA1002) 	
3. Cote House	
4. Land at College Rd, Fishponds	
Bonnington Walk former allotments site.	
6. Land north of Glencoyne Square	
7. Filwood Park (land within former BSA1110)	
8. Stapleton Cricket Club (BDA1301)	
9. Land north east of Blaise Castle SNCI	
10. Green spaces adjacent to River Trym (multiple)	
Yew Tree Farm was raised at consultation with respondents believing it should have a Local Green Space designation.	Yew Tree farm is in the Green Belt and will be protected from inappropriate development in accordance with Local Plan Publication Version Policy DS10 'The Green Belt'.

Suggested sites for designation as Reserved Open Space

Table 107 - main issues raised on Suggested sites for designation as Reserved Open Space and how they were addressed in the Local Plan

Main issues raised		ssues raised	How they were addressed
•	Re	es suggested for served Open Space signation:	These sites considered as not meeting the criteria set out in the 2019 consultation to merit designation.
	1.	Thomas Memorial (top of Whiteladies Road)	
	2.	Victoria Rooms (fountain surround)	
	3.	West end of Belgrave Hill	
	4.	Lockleaze Housing Greens	
	5.	Hengrove Park (30ha)	
	6.	Land at Cherry Orchard Camphill Community	

Transport

Table 108 - main issues raised on Transport and how they were addressed in the Local Plan

Main issues raised		How they were addressed
•	Strengthen policies: Should include proposals for a Clean Air Zone, Workplace Parking Levy and parking controls. Should have greater emphasis on tackling climate emergency, setting out how they will ensure sustainable development.	 The Local Plan Publication Version contains a suite of policies within its 'Transport' chapter to adequately address transport issues and improvements. For example, Policy T1 'Development and transport principles' sets out key matters that development proposals should address. Policy T2 'Transport infrastructure improvements' describes the major transport infrastructure enhancements planned for Bristol. A Clean Air Zone was introduced in 2022.
•	Lack of reference to taxi ranks.	 Any proposals for taxi ranks that require planning permission will be assessed against all relevant development plan policies and considerations.

Main issues raised	How they were addressed
Policies need to address personal safety and accommodation in public spaces for women, pushchairs, wheelchairs, cyclists and pedestrians.	• Local Plan Publication Version Policy T1 'Development and transport principles' expects development to provide safe and accessible streets. Proposals should also create places and streets shaped by the needs of pedestrians, cyclists and public transport users. Development is also expected to make appropriate provision for the transport needs of disabled people. Publication Version Policy DPM1 'Delivering well-designed, inclusive places' expects proposals to be inclusive, providing for equality of access and opportunity in its layout and design.

Draft Policy T1: Development and transport principles

Table 109 - main issues raised on Draft Policy T1: Development and transport principles and how they were addressed in the Local Plan

Main iss	ues raised	How they were addressed
use of cli Shou	ngthen policy against of private cars in light imate emergency. Ild aspire to make ol car free by 2030.	 Draft policy considered reasonable and proportionate. Approach maintained for Local Plan Publication Version Policy T1 'Development and transport principles'.
	cy wording unclear, e.g. ning of 'sustainable el'.	Wording considered clear.
betw Tran Loca	ear relationships veen policy, Bristol sport Strategy, Joint I Transport Plan 4 and ence base documents.	Draft policy sets out key matters that development proposals should address. Approach maintained for Publication Version Policy T1. Other Publication Version transport policies refer to supporting plans and strategies where appropriate.
bring	ibit students from ging cars to city except ecific circumstances.	Approach to parking for purpose-built student accommodation schemes set out in Local Plan Publication Version Policy H7 'Managing the development of purpose-built student accommodation'.
cons	cy does not adequately ider impacts of eased housing density	 Issue will be addressed by a number of Local Plan Publication Version policies including T1 'Development and transport principles', T3A

Main issues raised	How they were addressed
proposed by local plan.	'Transport development management', DPM1 'Delivering well-designed, inclusive places' and DC1 'Liveability in residential development including space standards, aspect and private outdoor space'.
Make reference to cycle network improvements.	 Addressed by Local Plan Publication Version policies T2 'Transport infrastructure improvements' and T6 'Active travel routes'.
Require segregation of cycle and walking routes in new developments.	 Approach to securing cycle and walking access and infrastructure improvements addressed by Local Plan Publication Version policies T2 'Transport infrastructure improvements', T3A 'Transport development management' and T6 'Active travel routes'.
Policy should expect development to make appropriate provision for the transport needs of disabled people.	 Addressed in wording in draft policy. Approach maintained for Local Plan Publication Version Policy T1 'Development and transport principles'.

Draft Policy T2: Transport schemes

Table 110 - main issues raised on Draft Policy T2: Transport schemes and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Policy should safeguard railway sites / land for both committed projects and where improvements are needed in areas with significant population or employment. Policy should include public transport improvements for poorly served areas. Proposals insufficiently radical to meet aim of creating sustainable or low energy transport networks. Concern about coordination of transport 	Local Plan Publication Version Policy T2 sets out the major planned enhancements to transport infrastructure in Bristol. These have been informed by supporting plans and strategies referred to in the policy. This includes the West of England Combined Authority's Joint Local Transport Plan 4, which ensures strategic considerations have informed transport schemes. Policy T2A 'Protected transport and movement routes' safeguards land required to accommodate future improvements.

Main issues raised	How they were addressed
schemes with strategic development.	
 Suggestions for transport proposals to be included in policy: tram system; new bus network and facilities; use of road space to create green cycle corridors; introduction of Low Emission Zone; reopening of Clifton Rocks Railway; support for growth of Bristol Airport; South Bristol Orbital road; Callington link road; railway stations at Lockleaze, Horfield, Ashley Down, Filton North and Henbury to Shirehampton, Avonmouth Dock, St Andrews Road and Severn Beach; improved bus connectivity from central Bristol to north east fringe; additional and expanded park and ride sites; reallocation of road space to prioritise public transport, cycling and pedestrians; improved cycle routes from city centre to fringe. Sites requested for safeguarding: Kingsland Road waste transfer station land and track bed (rail); 	Safeguarding of rail sites and transport depots addressed in Publication Version Policy T2A 'Protected transport and movement routes'.
Bristol East and West yards (rail); Barton Hill depot (rail); Malago Vale sidings, and container depot (rail); bus depots at Lawrence Hill	movement routes'.
and Hengrove.	

Main issues raised	How they were addressed
South Gloucestershire Council noted proposal to designate allotments in Stapleton as Local Green Space on a site previously identified for a Park & Ride scheme for the M32 corridor. They considered change in designation premature given importance of scheme is recognised within Joint Local Transport Plan.	Local Plan Publication Version Policy GI4 'Stapleton Allotments and Holdings – Food Growing Local Green Space' considered appropriate for reasons set out in its supporting text. Any proposals for improvements in the M32 corridor can be considered as part of the Joint Local Transport Plan process.

Draft Policy T3: Car and cycle parking provision for residential development

Table 111 - main issues raised on Draft Policy T3: Car and cycle parking provision for residential development and how they were addressed in the Local Plan

Main issues raised		How they were addressed
•	Parking standards:	 Approach to parking and electric vehicle infrastructure addressed in Local Plan Publication Version Policy T4A 'Parking, servicing and the provision of infrastructure for electric vehicles', which will be supported by guidance in the Transport Supplementary Planning Document.
•	updating. Electric car charging points should be part of new developments. All new office or housing development should have sufficient car club parking.	 Contributions to car club schemes will be sought where appropriate in accordance with Local Plan Publication Version Policy IDC1 'Development contributions and CIL' and the Planning Obligations supplementary planning document.

Draft Policy T4: Cycle parking provision for B1 office development

Table 112 - main issues raised on Draft Policy T4: Cycle parking provision for B1 office development and how they were addressed in the Local Plan

Main issues raised		How they were addressed
•	Standards should be seen as a minimum with higher standards considered at favourable locations.	Approach to cycle parking addressed in Local Plan Publication Version Policy T4A 'Parking, servicing and the provision of infrastructure for electric vehicles', which will be supported by
•	Rather than blanket approach, standards should apply according to development's location, e.g. based on forecasts of likely future modal share for cyclists from Transport Assessment.	guidance in the Transport Supplementary Planning Document.
•	One space per 50m² too low; should be one space per 40m².	

Draft Policy T5: Provision of infrastructure for electric and other low emission vehicles

Table 113 - main issues raised on Draft Policy T5: Provision of infrastructure for electric and other low emission vehicles and how they were addressed in the Local Plan

Mai	n issues raised	How they were addressed
• -	Lack of evidence to justify policy. Too onerous and prescriptive and will negatively impact scheme viability.	Policy approach set out in Local Plan Publication Version Policy T4A 'Parking, servicing and the provision of infrastructure for electric vehicles', which will be supported by guidance in the Transport Supplementary Planning Document.
á	Policy premature given absence of Government approach.	
i	Passive provision approach inappropriate as does not demonstrate existence of infrastructure.	
i	Concern policy encourages car journeys and will increase loss of private gardens.	

Main issues raised	How they were addressed
Proposal for 20% of car parking spaces to provide active charging:	
 Excessive and may result in underutilised facilities. 	
o Should be 50%.	

Retained policies

Table 114 - main issues raised on Retained policies and how they were addressed in the Local Plan

Main issues raised	How they were addressed
DM23 'Transport Development Management': Policy needs to be supplemented with reference to Transport Development Management guide for developers.	Reference included in Local Plan Publication Version Policy T3A 'Transport development management'.

Community facilities

Retained policies

Table 115 - main issues raised on Retained policies and how they were addressed in the Local Plan

Main issues raised	How they were addressed
BCS12 'Community Facilities and DM5 — Protection of Community Facilities': supporting text should be revised to make clear that cultural facilities are included within remit of these policies.	Cultural centres and venues are now referenced in introductory text to Local Plan Publication Version policies CF1 'Provision of community facilities' and CF2 'Retention of community facilities'.
DM6 'Public Houses': Concern existing policy not being applied.	The approach of Policy DM6 has been largely retained in the Local Plan Publication Version with Policy SSE8 'Public houses' including some additional explanatory text.

Climate Change and Sustainability

Draft Policy CCS1: Climate change, sustainable design and construction

Draft Policy CCS2: Towards zero carbon development

Draft Policy CCS3: Adaptation to a changing climate

Draft Policy CCS4: Resource efficient and low impact construction

Draft Policy CCS5: Renewable energy development

Table 116 - main issues raised on Draft Policies CCS1 – CCS5 and how they were addressed in the Local Plan

Main issues raised How they were addressed The suite of Climate Change and Sustainability Insufficiently ambitious. policies in the 2019 local plan consultation are Unclear meaning of 'zero no longer being progressed. Following the carbon'. consultation, emerging evidence, the Covid-19 Inappropriate to include pandemic and changes to the approach to climate change as a strategic regional planning meant that the separate section; should be decision was made to review the entire local 'golden thread' through the plan. As part of this process, an entirely new plan. suite of policies is proposed that will better address the climate emergency. Insufficient reference to Climate Change Emergency. These policies address the operational energy use of new development, embodied carbon, Separate energy section adaptation to climate change through design, needed, setting out city's energy efficiency and the provision of new vision for energy renewable energy generation capacity both at generation, storage and scale and within individual buildings. distribution. Comments received in the 2019 consultation, Lack of evidence and although relating to the previous policies were viability-testing to justify used to inform the development of the new 'Net requirements. Zero and Carbon' Local Plan chapter. Audit of predicted carbon These policies reflect an up-to-date and emissions over plan's extensive evidence base, including works lifetime needed and should commissioned by the council directly. be monitored. **Environment Agency** thought there was insufficient reference to flood risk.

Flood Risk and Water Management - Retained policies

Table 117 - main issues raised on Flood Risk and Water Management - Retained policies and how they were addressed in the Local Plan

Main issues raised	How they were addressed
BCS16 'Flood Risk and Water Management': text from BCS16 should be applied to all proposed development allocations.	 Allocations set out in the Local Plan Publication Version contain references to flood risk issues and required measures where appropriate.

Design and Conservation

Table 118 - main issues raised on Design and Conservation and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Historic England emphasised importance of Local Plan addressing opportunities to enhance heritage assets and Conservation Areas, particularly using up-to- date evidence.	 Addressed in Local Plan Publication Version Policy CHE1 'Conservation and the historic environment'.

Draft Policy DC1: Liveability in residential development including space standards

Table 119 - main issues raised on Draft Policy DC1: Liveability in residential development including space standards and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Concern about lack of evidence to justify the policy's approach, particularly on the potential for negative impacts on the viability of development proposals.	Support for policy approach in NPPF. Local Plan supported by viability assessment.
 Definition sought on terms used in policy: 'short-' and 'long-term occupancy', 'occupier groups' and 	 References to short-term and occupier groups removed from Local Plan Publication Version Policy DC1 'Liveability in residential development including space standards and

Main issues raised		Но	ow they were addressed
	'liveability'.		private outdoor space'. Long-term occupancy explained in policy wording with reference to Use Class C3 schemes. Liveability considerations referred to in Publication Version Policy DPM1 'Delivering well-designed, inclusive places', and Urban Living Supplementary Planning Document.
•	Policy should be sufficiently flexible to determine appropriate density on a site-by-site basis at planning application stage.	•	Policy DC1 aims to ensure development proposals develop land to its optimum density. Flexibility is provided in policy wording with reference to need for proposals to create a liveable environment having regard to all other relevant policies in the plan. This includes Policy UL2 'Residential densities', which provides more detail on how appropriate density will be assessed.
•	Important that retained design policies and Policy Advice Note guidance is referenced in policy text.	•	Local Plan Publication Version Policy CHE1 'Conservation and the historic environment' refers to supporting policy guidance and advice that will continue to be used to guide decisions on development proposals.
•	Concern about appropriateness of Urban Living supplementary planning document being used to underpin requirements of local plan policy, e.g. the standards / requirements in the SPD have not been viability tested in the way that a Local Plan policy would be.	•	Considered appropriate for detailed guidance on the application of Local Plan policy to be provided by Supplementary Planning Document. Local Plan supported by viability assessment.
•	Minimum space standards:	•	Minimum space standards:
	 Caveat needed for co-housing and community living proposals, which may require flexibility on minimum space standards. 		 Supporting text to Policy DC1 explains that standards may not be necessary for specialist forms of accommodation.
			 Minimum space standards are considered key to urban living approach, i.e. one that balances the efficient and effective use of land with making quality places to live.

Main issues raised	How they were addressed
 Concern they will affect housing delivery. 	
Private outdoor space:	Private outdoor space:
 Lack of evidence and reasoning to justify policy. 	 Appropriate private outdoor space provision considered to be key to urban living approach, i.e. one that
 May not be feasible without impacting on dwelling number capacity and residential amenity. 	balances the efficient and effective use of land with making quality places to live.
Sport England advocated reference to its Active Design guidance and developer's checklist and suggested a model policy.	 Ensuring development proposals promote or provide opportunities for physical activity are addressed in a number of Local Plan Publication Version policies including Policy DPM1 'Delivering well-designed, inclusive places'; Policy T1 'Development and transport policies' and Policy T6 'Active travel routes'.

Draft Policy DC2: Tall buildings

Table 120 - main issues raised on Draft Policy DC2: Tall buildings and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Objections included concerns about detrimental impacts on heritage and character, as well as wellbeing through social isolation. Also doubts as to whether they are an effective means of increasing density.	 Local Plan Publication Version Policy DC2 'Tall buildings' sets out criteria to ensure important planning considerations are appropriately considered in determining tall building applications.
Reference should be made to proposals avoiding masking topography as a way of protecting views across the city.	 Supporting text to Policy DC2 explains that Landscape and Visual Impact Assessments will be necessary to enable the visual impact of tall buildings from near and distant viewpoints to be assessed.

Main issues raised	How they were addressed
More clarity needed on:	Clarity requests:
 preferred location of tall buildings, e.g. shown on a map or within the policy text; and evidence 	 Policy DC2 provides locational guidance with focus on areas identified as suitable for most intensive forms of development or as identified in policies for specified regeneration areas.
documents that will be required to support planning applications, e.g. daylighting, overshadowing, wind and security assessments.	 Explanatory text to Policy DC2 refers to expectations for supporting information required, e.g. Landscape and Visual Impact Assessments, Design and Access Statements, plus signposts to additional guidance provided in the Urban Living Supplementary Planning Document.

Draft Policy DC3: Local Character and Distinctiveness

Table 121 - main issues raised on Draft Policy DC3: Local Character and Distinctiveness and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Need for policy to address issues relating to negative impacts of outdoor advertising / billboards. 	 Addressed in Local Plan Publication Version Policy AD1 'Advertisements'.
Inconsistency between this and the tall buildings policy, particularly relating to the requirement that proposals should complement the scale of existing buildings.	 Aspects of Draft Policy DC3 have been incorporated into Publication Version Policy DPM1 'Delivering well-designed, inclusive places'. Both DPM1 and Publication Version Policy DC2 'Tall buildings' will ensure proposals for tall buildings are appropriately assessed, having regard to matters including the location and context of the development site and the proposal's design.
Concern that policy is biased against areas which are already higher density, as it requires development to complement existing scale and massing.	 Aspects of Draft Policy DC3 have been incorporated into Publication Version Policy DPM1 'Delivering well-designed, inclusive places'. Reference to complementing existing scale and massing has been removed.

Main issues raised	How they were addressed	
 More clarity sought on the	 Aspects of Draft Policy DC3 have been	
locations where 'innovative	incorporated into Publication Version Policy	
design solutions' could be	DPM1 'Delivering well-designed, inclusive	
appropriate, e.g. some	places'. Reference to innovative design	
Outer Urban Areas.	solutions has been removed.	

Retained Policies

Table 122 - main issues raised on Retained Policies and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
BCS21: Quality Urban Design: Reference to Building for Life Very Good standard now out of date.	Local Plan Publication Version Policy DPM1 'Delivering well-designed, inclusive places' refers to the latest relevant guidance, which includes the National Design Guide.	
DM27: Layout and Form: Text relating to height, scale and massing requires development to 'be appropriate to the immediate context.' This appears contradictory to draft policies DC2 and DC3.	 Ensuring development proposals adequately address site context are important considerations in Local Plan Publication Version Policies DPM1 'Delivering well- designed, inclusive places'; DC1 'Liveability in residential development including space standards and private outdoor space'; and DC2 'Tall buildings'. 	
DM29: Design of New Buildings: Concern about its lack of reference to issues relating to proposals for the display of advertisements.	 Addressed in Local Plan Publication Version Policy AD1 'Advertisements'. 	
BCAP30: Pedestrian routes: Map accompanying policy needs updating with:	The approach of Policy BCAP30 has been incorporated into a number of policies in the Local Plan Publication Version. For example:	
routes completed since 2015;	 In the Central Bristol section of the 'Development Strategy' chapter, each 	
 newly proposed routes from City Centre Framework and West of 	area policy makes reference to development including measures to secure public access and routes for walking.	
England Local Cycling and Walking	 Policy T2 'Transport infrastructure improvements' highlights the provision of safe and attractive 	

Main issues raised	How they were addressed	
Infrastructure Plan; and o proposals for routes	walking routes and references the plans and strategies which will deliver these enhancements.	
connecting new strategic development areas within walking distance of the	 Policy T3A 'Transport development management' expects development to provide for pedestrians including, where appropriate, enhancing the pedestrian network. 	
centre.	 Policy T6 'Active travel routes' will also ensure that the function and amenity of Active Travel Routes is protected. This is supported by the expectation that proposals adjacent to the Active Travel Route network should, where possible, provide connections with existing or proposed routes. 	
BCAP32: Quayside walkways: Environment Agency stated that quayside walkways need to ensure harbour walls can be inspected in the interest of flood risk management.	Local Plan Publication Version Policy BG5 'Biodiversity and access to Bristol's waterways' includes reference to ensuring development proposals enable long-term safe access, stewardship and maintenance of waterways and watersides.	

Health and Wellbeing

Table 123 - main issues raised on Health and Wellbeing and how they were addressed in the Local Plan $\,$

Main issues raised		How they were addressed			
Policies needed on:		Addressed by:			
	0	advertisement displays;		0	Local Plan Publication Version Policy AD1 'Advertisements'.
	0	Social Value; Provision of		0	Local Plan Publication Version Policy SV1 'Social value and inclusion'.
	Ü	education and nursery provision and children's play.		0	Local Plan Publication Version policies IDC1 'Development contributions and CIL' and GI A 'Open Space for Recreation'.

Pollution

Draft Policy HW1: Pollution Control and Water Quality

Table 124 - main issues raised on Draft Policy HW1: Pollution Control and Water Quality and how they were addressed in the Local Plan

Main issues raised		Но	w they were addressed
a A d v	Revise policy to require applicants to submit an Agent of Change Statement demonstrating ongoing viability of existing uses will not be threatened.	•	This is considered to be satisfactorily addressed with the policy's requirement that relevant proposals should include measures to mitigate the impact of existing pollution on future occupiers. This can be addressed in the Design and Access Statement or other supporting documentation.
to o b	Clarification sought on erms used, e.g. what type of development is meant by 'considered desirable for easons of economic or wider social need'.	•	Policy text provides examples of music venues and industrial uses.
s S a r	Wessex Water sought specific reference to Sewage Treatment Works and Pumping Stations requiring protection from undue operational constraints.	•	Not considered necessary or appropriate to make specific reference to these matters. Local Plan Publication Version Policy DPM1 'Delivering well-designed, inclusive places' ensures that new development has regard to the built environment context and assets of each site.

Draft Policy HW2: Air Quality

Table 125 - main issues raised on Draft Policy HW2: Air Quality and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Policy should be strengthened: references to PM10 should also include PM2.5. require an Air Quality Assessment in planning applications. 	 Strengthening of policy: Reference not included in the Local Plan Publication Version Policy HW2

Main issues raised	How they were addressed
 all major development to be 	appropriate scheme of mitigation for relevant proposals.
at a minimum of neutral on its air quality effects.	 Such an approach not considered reasonable or feasible as could prevent development from coming forward which is essential for reasons of economic or wider social need.
Policy should focus on ensuring development is in locations which reduce journey lengths and discourages private car use.	 Addressed in Local Plan Publication Version Policy T1 'Development and transport policies'.

Retained policies

Table 126 - main issues raised on Retained policies and how they were addressed in the Local Plan

Main issues raised	How they were addressed
DM14: The Health Impact of Development – policy should be updated / amended to: Recommend heal considerations are incorporated into Design and Access Statements (or Environmental Statements) for larger developments rather than a Heal Impact Assessme Make clear it cover both physical and mental health.	HW2B 'Health and development'. This seeks to ensure development contributes to reducing causes of ill health, improves health and reduces health inequalities by addressing adverse health impacts, providing a healthy living environment, promoting and enabling healthy lifestyles and providing good access to health facilities and services. Health Impact Assessments will be required to accompany large development proposals or where a significant impact on health and wellbeing is likely. These will identify any negative impacts and mitigation measures. Supporting text refers to policy relating to both

Health Impacts of Development

Draft Policy HW3: Takeaways

Table 127 - main issues raised on Draft Policy HW3: Takeaways and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Extend approach to: off-licences; betting shops; fast food advertising close to schools. 	 Requests to extend approach: Insufficient evidence concerning levels of harmful impact to justify policy. Insufficient evidence concerning levels of harmful impact to justify policy. The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 restrict local
	planning authority powers in respect of the control of advertisements to amenity and public safety matters only.
 Assumption that all Use Class A5 uses are harmful lacks evidence and fails to recognise their economic and centre viability benefits. 	Policy does not pursue blanket ban of all A5 uses. Instead it allows an assessment to be made on whether a specific proposal is likely to have a harmful impact.
Lack of clarity on what constitutes 'young people' or 'youth facilities'.	These are considered to be readily understood terms.
 Policy unjustified as fails to consider schools being closed for much of the year (i.e. weekends and school holidays). 	 Approach considered reasonable and supported by national planning policy and guidance as well as local health-related objectives.
Concern that application of the policy to mixed A3/A5 uses goes beyond NPPF intentions.	 Reference to mixed A3/A5 uses considered important to ensure the assessment of any potential harmful impacts can be made for mixed-use proposals which include A5 uses.
Clarification sought on whether policy would apply to leisure areas such as Avonmeads Retail Park.	Policy wording confirms that policy approach applies to out of centre locations.
Distance threshold in policy should be 800m.	Distance criteria approach maintained for Local Plan Publication Version Policy HW3 'Takeaways'. Supporting text to the policy identifies that there may be cases where a

Main issues raised	How they were addressed
	proposed takeaway located beyond 400m may not be acceptable due to other local factors which would result in the outlet being likely to have a harmful influence on children's behaviour.

Utilities and Minerals

Retained policies

Table 128 - main issues raised on Retained policies and how they were addressed in the Local Plan

Main issues raised	How they were addressed
DM38: Minerals Safeguarding Areas: Conflict with proposal for new neighbourhood at Bath Road, Brislington (Policy DS12). Minerals Safeguarding Area should be deleted from proposals map as it relates to DS12 as extraction of coal is unlikely to be viable or desirable in planning and environmental terms.	Approach in accordance with national planning policy.

Draft Development Allocations

Ashley

BDA0101 Land opposite 200-208 Mina Road

Table 129 - main issues raised on BDA0101 Land opposite 200-208 Mina Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Community-led development sought. No mention of garages. Concern about consequent impacts on parking. 	 This site is no longer considered appropriate to be allocated due to recent planning permission for storage use on southern part of the site (ref. 22/00380/F) and unsuitability of northern section for housing due to flood risk.

Main issues raised	How they were addressed
Concerns over car access to site.	
Environment Agency thought no development should be allowed within 8 metres of Main River culvert.	
Negative impact on rural character of area.	
Concern about density of development proposed.	

BDA0102 Land at 17-47 Lower Ashley Road

Table 130 - main issues raised on BDA0102 Land at 17-47 Lower Ashley Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Environment Agency considered that site needs to be carefully considered with 'More Vulnerable' uses in Flood Zone 1 or located on upper floors.	 Allocation no longer considered necessary as the site has planning permission for 31 units on western section (ref. 18/06646/F), and offices and student accommodation on the eastern section (ref. 18/05532/M and ref. 15/05530/P). The western section is under construction.

Avonmouth and Lawrence Weston

BDA0205 Land south of Gloucester Road

Table 131 - main issues raised on BDA0205 Land south of Gloucester Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Environment Agency noted stated that the proposed allocation for 140 homes is located within the breach hazard bandwidth identified in the Strategic Flood Risk Assessment (SFRA) Level 2.	This site is no longer considered appropriate to be allocated due to unresolved flood risk issues. The site is within the limits defined by the Development Consent Order for the construction, operation and maintenance of the Hinkley Point C Connection Project.

Main issues raised	How they were addressed
Need to be consistent with the requirements of Draft Policy HW1 and Retained Policy DM35.	
Respondents suggested this site would need to respect the heritage assets on Gloucester Road and Clayton Street.	

BDA0206 Former Sea Mills Children Centre

Table 132 - main issues raised on BDA0206 Former Sea Mills Children Centre and how they were addressed in the Local Plan ${\bf P}$

Main issues raised	How they were addressed
Respondents wanted to see a community-led development.	Allocation no longer necessary as site has been developed.
Respondent believed the development does not match density of the area.	

BDA0207 Land adjacent to Custom House

Table 133 - main issues raised on BDA0207 Land adjacent to Custom House and how they were addressed in the Local Plan

Ma	ain issues raised	How they were addressed
•	Environment Agency stated that site should be screened against Avonmouth Severnside Enterprise Area flood risk model.	This site is no longer considered appropriate to be allocated due to unresolved flood risk issues. The site is within the limits defined by the Development Consent Order for the construction, operation and maintenance of the Hinkley Point C Connection Project.
•	Need to be consistent with the requirements of Draft Policy HW1 and Retained Policy DM35.	

Bedminster

BDA0302 Land to West of Ashton Gate Stadium, Marsh Road / Winterstoke Road

Table 134 - main issues raised on BDA0302 Land to West of Ashton Gate Stadium, Marsh Road / Winterstoke Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Sport England requested more clarity about the sport included in the mixed-use allocation. The Environment Agency said there was an opportunity to deliver a net gain and environmental enhancements and improve the river flow under Winterstoke Road and prevent siltation of the Old Colliters Brook. 	The site has planning permission for a sports and convention centre, a hotel, 125 homes, office accommodation, retail, gym, club museum, multi-storey car park (ref. 21/03165/F). Following discussion, the Environment Agency did not raise any objection to the application and a Biological Net Gain Assessment was provided which demonstrated that overall, the proposed landscape plan would deliver approximately 30% net gain for area-based habitats, 60% net gain for river units and a 90% net gain for hedgerow units.

BDA0303 Former Ashton Sidings

Table 135 - main issues raised on BDA0303 Former Ashton Sidings and how they were addressed in the Local Plan

M	ain issues raised	How they were addressed
•	Comment suggested an amendment to reflect additional technical design and studies around Metro Bus services and the Ashton Gate Underpass. Environment Agency stated that the Tidal and Fluvial flood zone in very close proximity to the site and therefore climate change will need to be included in the Sequential Test and flood risk management.	 Allocation no longer considered necessary as the site has planning permission for residential apartments including affordable housing (social rented and shared ownership) and flexible retail/cafe space, and works have begun on site (ref. 20/01655/F).
•	Respondent suggested an increase in density is required.	

BDA0304 1-25 Bedminster Down Road

Table 136 - main issues raised on BDA0304 1-25 Bedminster Down Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Sport England stated the Ju-Jitsu Dojo gym would need to be replaced in line with NPPF standards. Respondents mentioned how the road design was dangerous to cyclists and pedestrians and this would need to be improved. 	The redevelopment for housing led mixed- uses with flexible workspace if the site is no longer required in its current use, would represent a more efficient use of land in a mixed residential context in a sustainable location adjacent to bus routes and Parson Street Station. The allocation accords with the Local Plan's aim of promoting urban living across the city with a focus on brownfield land, as outlined in Policy UL1 'Effective and efficient use of land'.
	 A development consideration requiring suitable access, which safeguards the operation of the adjacent junction and highway to ensure free-flow of public transport and general traffic, has been included.

BDA0306 Land at Marsh Lane / Winterstoke Road

Table 137 - main issues raised on BDA0306 Land at Marsh Lane / Winterstoke Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Respondents suggest that development should better incorporate cycling facilities in this area into the city network. 	 Allocation no longer considered to be necessary as any development proposals on the site can be progressed through the Development Management process.

Bishopston and Ashley Down

BDA0401 Land adjacent 321 Gloucester Road

Table 138 - main issues raised on BDA0401 Land adjacent 321 Gloucester Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
• None	This site is no longer considered appropriate to be allocated due to recent planning

Main issues raised	How they were addressed
	permission for the erection of a new retail unit on a larger site (ref. 21/00202/F) and the subsequent clearance of the site.

Brislington East

BDA0601 Land at Latimer Close

Table 139 - main issues raised on BDA0601 Land at Latimer Close and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Respondent suggested without compensatory tree planting or open space provision development here would contradict the city's aim to increase tree canopy cover. 	 A development consideration has been added requiring the retention and integration of important trees located within the site.

Brislington West

BDA0702 Land at Marmalade Lane (south)

Table 140 - main issues raised on BDA0702 Land at Marmalade Lane (south) and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Concern about loss of open space. Environment Agency raised concern that a small part south of the site is within Flood Zone 2 and requested that this be removed from the allocation 	 The redevelopment of the site for homes would represent a more efficient use of underdeveloped land which is not required for open space purposes. The development consideration relating to flood risk has been revised to ensure development is sited appropriately within lower risk areas.

BDA0703 Land at Marmalade Lane (north)

Table 141 - main issues raised on BDA0703 Land at Marmalade Lane (north) and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Respondents wanted to see a community-led development.	 Policy H5 'Self-build and community-led housing' provides several mechanisms for delivering community-led housing including specific allocations, provision for a minimum of such development on allocations within the green belt, seeking a proportion of growth and regeneration areas as self- build/custom-build housing and/or community-led housing, and community-led exceptions sites.

Clifton Down

BDA1001 Land west of Hampton Lane

Table 142 - main issues raised on BDA1001 Land west of Hampton Lane and how they were addressed in the Local Plan $\,$

Main issues raised	How they were addressed
 Concern about loss of open space. Concern about waste facilities. Concern over student housing. Respondents suggested large amounts of car parking and cycle parking on site. 	 Should plots become available or no longer be required in their current layout, redevelopment for homes would represent a more efficient use of land in a predominantly residential context. Policy DC4 'Recycling and refuse provision in new development' requires waste and recycling provision of specific capacity, design and access requirements to be provided as part of new residential developments.
	 Houses in multiple occupation and purpose built student housing will be subject to polices H7 'Managing the development of purpose-built student accommodation' and H6 'Houses in multiple occupation and other shared housing'.
	Policy T4A 'Parking, servicing and the provision of infrastructure for electric vehicles' requires appropriate levels of safe, secure, accessible and usable parking provision. It also explains the importance of cycle parking. This site is in a very accessible location, within Whiteladies Road Town

Main issues raised	How they were addressed
	Centre, and close to public transport (both bus routes on Whiteladies Road and Clifton Down Train Station).

BDA1002 Land at Whiteladies Gate

Table 143 - main issues raised on BDA1002 Land at Whiteladies Gate and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Site should be retained for commercial use. Concern about loss of open space. Concern over loss of existing green infrastructure. 	 Development is allocated for housing, which may incorporate compatible workspace should the site no longer being required in its current use. Redevelopment for homes would represent a more efficient use of land in a predominantly residential context. A development consideration has been
Respondents suggested a maximum of 8-10 homes.	included to ensure that development would not be harmful to trees on the boundaries of the site.
•	The estimated capacity for the site is 10 homes. In accordance with policy DA1 'Proposed development allocations', if the capacity indicated is not possible due to site considerations, a lower number of homes than the one stated would be appropriate.

BDA1003 Land Adjacent Alma Vale Road and Alma Court

Table 144 - main issues raised on BDA1003 Land Adjacent Alma Vale Road and Alma Court and how they were addressed in the Local Plan

M	ain issues raised	How they were addressed
•	Respondent suggested the removal of the allocation for residential development and suggested the retention of car parking space.	 The redevelopment of the site for homes would represent a more efficient use of land in a predominantly residential context. The development consideration has been revised to emphasise the need to take account of the neighbouring Grade II listed
•	Need to protect the Grade II listed building.	buildings.A development consideration requiring the
•	Concern over access to site.	provision of suitable access to the site from

Main issues raised	How they were addressed
Concern over car parking.Should be allocated to 10	Alma Vale Road, with appropriate enhancements to footways is included.
or fewer homes.	 Policy T4A 'Parking, servicing and the provision of infrastructure for electric vehicles' requires appropriate levels of safe, secure, accessible and usable parking provision. This site is in a very accessible location, adjacent to Whiteladies Road Town Centre, and close to public transport (both bus routes on Whiteladies Road and Clifton Down Train Station).
	The estimated capacity of 10 homes is based on achieving an efficient use of land within the context of the Whiteladies Road Conservation Area. In accordance with policy DA1 'Proposed development allocations', if the capacity indicated is not possible due to site considerations, a lower number of homes than the one stated would be appropriate.

BDA1004 Barley House, Oakfield Grove

Table 145 - main issues raised on BDA1004 Barley House, Oakfield Grove and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Comment suggested 20 homes was too many.	• The estimated capacity of 20 homes is based on achieving an efficient use of land within the context of the Grade II Listed Building. In accordance with policy DA1 'Proposed development allocations', if the capacity indicated is not possible due to site considerations, a lower number of homes than the one stated would be appropriate.

Cotham

BDA1101 Land at Gibson Road

Table 146 - main issues raised on BDA1101 Land at Gibson Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Respondent suggested the land was ideal for low density buildings.	 The site is considered suitable for residential development to support the existing pattern of residential developments fronting Gibson Road.

BDA1102 Land at Sydenham Lane

Table 147 - main issues raised on BDA1102 Land at Sydenham Lane and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Respondent suggested the land was ideal for low density buildings.	 The site is considered suitable for residential development to support the existing pattern of residential developments fronting Sydenham Lane.

Easton

BDA1201 16-20 Fishponds Road

Table 148 - main issues raised on BDA1201 16-20 Fishponds Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Respondents wanted to see a community-led development.	 Policy H5 'Self-build and community-led housing' provides several mechanisms for delivering community-led housing including specific allocations, provision for a minimum of such development on allocations within the green belt, seeking a proportion of growth and regeneration areas as self- build/custom-build housing and/or community-led housing, and community-led exceptions sites.

Eastville

BDA1301 Stapleton Cricket Club

Table 149 - main issues raised on BDA1301 Stapleton Cricket Club and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Concern over loss of green space and amenity space. Concern over traffic. Sport England stated that if the site is developed replacement facilities should be provided. 	 Self-build custom housebuilding or community-led housing is considered appropriate subject to the provision of suitable alternative playing pitch for recreational purposes. Traffic issues will be addressed by policy T3A 'Transport development management'. This
 Respondent was concerned about a notable oak tree on the boundary, which was registered on the Ancient Tree Inventory. 	will require a Transport Assessment to be submitted alongside a planning application where development is likely to have a significant traffic impact. This will enable the council to assess impacts of proposals and identify any necessary mitigation measures.
	 A development consideration requiring the retention of green infrastructure including an important oak tree and boundary hedgerows has been added.

BDA1302 Land south of Rose Green Close

Table 150 - main issues raised on BDA1302 Land south of Rose Green Close and how they were addressed in the Local Plan $\,$

Main issues raised	How they were addressed
 Issue of lack of infrastructure. Sport England recommended the site is protected for its amenity value and is therefore deleted from the allocations. 	 Future development in Bristol will be supported by new and improved infrastructure such as schools, parks, transport facilities and health facilities in accordance with Policy IDC1 'Development contributions and CIL'. New development will be expected to contribute to these requirements generally through Community Infrastructure Levy or via planning obligations in cases where site specific infrastructure requirements arise. Should the site no longer be required in its current use redevelopment for homes would represent a more efficient use of land in a residential context.

<u>Filwood</u>

BDA1401 Land at Hartcliffe Way

Table 151 - main issues raised on BDA1401 Land at Hartcliffe Way and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Environment Agency stated that the site in close proximity to the Main River Malago and 8 metre maintenance access will be required. Need for public transport provisions. Need for a mixed use development. 	 A development consideration requiring the maintenance of an 8m buffer adjacent to the main river to ensure maintenance access to the waterway has been added. The site is located on a route identified for public transport improvements in Policy T2 'Transport infrastructure improvements'. It is in a relatively sustainable location on a bus route along Hartcliffe Way and close to Parson Street Train Station. The site is relatively close to shops and services and redevelopment for residential mixed-use with workspaces would represent a more efficient use of land in a mixed residential and industrial context.

BDA1402 Land at Nover's Hill

Table 152 - main issues raised on BDA1402 Land at Nover's Hill and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Environment Agency stated that the site is in close proximity to the Main River Malago and 8 metre maintenance access will be required.	 A development consideration requiring the maintenance of an 8m buffer adjacent to the main river to ensure maintenance access to the waterway has been added.

BDA1403 Land at Bedminster Road/Highbury Road

Table 153 - main issues raised on BDA1403 Land at Bedminster Road/Highbury Road and how they were addressed in the Local Plan

N	lain issues raised	Но	w they were addressed
•	Environment Agency stated that a small part of the site	•	Allocation no longer necessary as site has been developed.

Main issues raised	How they were addressed
is within Flood Zone 2 and requested this be removed from the allocation.	

Frome Vale

BDA1501 Land at College Road Fishponds

Table 154 - main issues raised on BDA1501 Land at College Road Fishponds and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Concern over the loss of green space. Concern over horse that lives on site considered very important to local community. 	 The development strategy has a focus on ensuring the delivery of new homes. The site is included in Policy H5 'Self-build and community-led housing' as it is considered appropriate for self-build, custom or community-led housing and would support its delivery, contributing to greater housing choice and potentially providing lower cost options for households than regular market housing.
	 The site has a residential context and is in a sustainable location close to shops and services in Fishponds Town Centre and open space at Oldbury Court Estate.

Hengrove and Whitchurch Park

BDA1801 Hengrove Leisure Park

Table 155 - main issues raised on BDA1801 Hengrove Leisure Park and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
 Request that policy should explicitly state that any development would be guided by the Neighbourhood Plan. Need to maintain links to Hengrove Park. 	 Allocation no longer considered necessary as the site has planning permission for residential-led mixed-use development comprising up to 350 homes and up to 1,650sqm of flexible Class E uses (ref. 21/00531/P). 	

BDA1802 Land at Western Drive

Table 156 - main issues raised on BDA1802 Land at Western Drive and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Concern over loss of wildlife network. Woodland on the site should be maintained and connected to other nearby woodland. 	This site is no longer considered appropriate to be allocated as it is no longer available for industrial / distribution uses.

Knowle

BDA2201 Broadwalk Shopping Centre

Table 157 - main issues raised on BDA2201 Broadwalk Shopping Centre and how they were addressed in the Local Plan

Main issues raised	How they were addressed
• None.	 Allocation no longer considered necessary as the site has planning permission (refs. 18/05184/P and 22/03924/P)

Lockleaze

BDA2401 Bridge Farm, Land at South Hayes

Table 158 - main issues raised on BDA2401 Bridge Farm, Land at South Hayes and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Concern over loss of open space. Comment suggested that the site should provide 50 100% affordable homes. 	The allocation includes open space and the capacity has been reduced to an estimated 15 homes to enable the majority of the open space on the site to be retained. It is considered that with sensitive design, this will enable a type and design of development which preserves and enhances the Stapleton and Frome Valley Conservation Area and facilitates the sensitive preservation and enhancement of the Grade II Listed Bridge Farm.
	 Policy H5 'Self-build and community-led housing' specifically allocates this site for

Main issues raised	How they were addressed
	self-build and custom housebuilding and/or community-led housebuilding. The policy states that such sites should, where viable, be delivered primarily as affordable housing.

BDA2402 Land to the east of Romney Avenue and Stanfield Close

Table 159 - main issues raised on BDA2402 Land to the east of Romney Avenue and Stanfield Close and how they were addressed in the Local Plan

Main issues raised	ŀ	How they were addressed
Respondents was a community-ledevelopment.		Allocation no longer considered necessary as the site has planning permission for 12 homes and development is under construction (ref. 22/01638/FB).

BDA2403 Former Gas Holder Site, Glenfrome Road

Table 160 - main issues raised on BDA2403 Former Gas Holder Site, Glenfrome Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Respondents wanted to see a community-led development.	 Allocation no longer necessary as the site has been developed as a new office/light Industrial unit, and storage/distribution use (ref. 19/04802/F).

Redland

BDA2501 Land south of Zetland Road

Table 161 - main issues raised on BDA2501 Land south of Zetland Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Request for additional small workshop spaces or a convenient health care facility location is provided.	 The allocation makes provision for housing compatible workspace. The redevelopment of the site for homes with workspace would represent a more efficient use of land in a predominantly residential context.

BDA2502 Land at Cossins Road

Table 162 - main issues raised on BDA2502 Land at Cossins Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Respondents wanted to see a community-led development.	 Policy H5 'Self-build and community-led housing' provides several mechanisms for delivering community-led housing including specific allocations, provision for a minimum of such development on allocations within the green belt, seeking a proportion of growth and regeneration areas as self- build/custom-build housing and/or community-led housing, and community-led exceptions sites.

St George Trooper's Hill

BDA2701 Land at Crew's Hole Road

Table 163 - main issues raised on BDA2701 Land at Crew's Hole Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
Environment Agency object to the development in this location. The site is located in present day Fluvial and Tidal Flood Zone 3 and with climate change, flood levels and depths would increase further.	This site is no longer considered appropriate to be allocated due to unresolved flood risk and highways issues.	

St George West

BDA2801 Land to the south of Blackswarth Road

Table 164 - main issues raised on BDA2801 Land to the south of Blackswarth Road and how they were addressed in the Local Plan

Ma	ain issues raised	How they were addressed	
•	Need to retain the character of the Avon Valley Conservation Area.	 There is a development consideration included which requires development to take account of the Avon Valley 	
•	Concern over lack of public transport.	Conservation Area and retain a green frontage with the River Avon. Furthermore, Policy CHE1 'Conservation and the historic	
•	Environment Agency stated that this site relates to Future Flood Zone 3 and is	environment' states that development within or which would affect the setting of a conservation area will be expected to	

Main issues raised	How they were addressed	
in proximity to the Main River Avon. An 8-metre set back distance would be	preserve or, where appropriate, enhance those elements which contribute to their special character or appearance.	
required from the brink of the bank.	The site is in close proximity to St Annes Village Local Centre and bus services on Blackswarth Road.	
	The development consideration relating to flood risk has been revised to stress that the drainage strategy should cover the lifetime of the development and ensure no increased flood risk to third parties.	
	A development consideration requiring the maintenance of an 8m buffer adjacent to the main river to ensure maintenance access to the waterway has been added.	

Southmead

BDA2901 Land at Lanercost Road

Table 165 - main issues raised on BDA2901 Land at Lanercost Road and how they were addressed in the Local Plan $\,$

Main issues raised	How they were addressed
 Respondents wanted to see a community-led development. Concern over loss of open space. 	 Policy H5 'Self-build and community-led housing' provides several mechanisms for delivering community-led housing including specific allocations, provision for a minimum of such development on allocations within the green belt, seeking a proportion of growth and regeneration areas as self- build/custom-build housing and/or community-led housing, and community-led exceptions sites.
	The redevelopment of the site for homes would represent a more efficient use of land in a predominantly residential context. The land is not required for open space purposes and is in close proximity to Elderberry Walk Open Space to the north.

Southville

BDA3001 Land at North Street / Durnford Street

Table 166 - main issues raised on BDA3001 Land at North Street / Durnford Street and how they were addressed in the Local Plan

Main issues raised	How they were addressed
• None.	 Allocation no longer considered necessary as there are several planning permissions on parts of the site — including mixed-use development of 107 homes, office workspace and flexible commercial space which is under construction (ref. 18/04367/F); 7 flats (ref. 23/00592/X); and 40 homes and commercial floorspace (ref. 20/04125/F) — which demonstrate that the site is coming forward.

Stockwood

BDA3101 Greville building, Lacey Road

Table 167 - main issues raised on BDA3101 Greville building, Lacey Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Lack of access. Concern over allocation of social housing. Concern over parking. 32 homes considered too many. 	 The site has planning permission for 26 residential units (ref. 21/05859/FB). Issues over access have been resolved through the Development Management process. Parking has been shown to meet the maximum standards of the adopted Bristol Local Plan.
	 Policy AH1 'Affordable housing provision' provides a range of delivery mechanisms to deliver affordable housing. Bristol City Council is committed to building a better Bristol where all citizens are able to access a safe, permanent and genuinely affordable place to live. The need for affordable housing in Bristol is very high and critical to the long-term social, economic and environmental health of the city.

Main issues raised	How they were addressed		
	The redevelopment of the site for homes would represent a more efficient use of land in a predominantly residential context. The estimated capacity has been reduced to 25 homes to reflect the planning permission on the site. In accordance with policy DA1 'Proposed development allocations', if the capacity indicated is not possible due to site considerations, a lower number of homes than the one stated would be appropriate.		

Stoke Bishop

BDA3201 Land at Sanctuary Gardens, Sneyd Park

Table 168 - main issues raised on BDA3201 Land at Sanctuary Gardens, Sneyd Park and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Respondents wante a community-led development. 20 homes seen to be many. 	housing' provides several means for delivering community-led housing including specific allocations, provision for a minimum
	The estimated capacity of 20 homes reflects the context within the Sneyd Park Conservation Area. In accordance with policy DA1 'Proposed development allocations', if the capacity indicated is not possible due to site considerations, a lower number of homes than the one stated would be appropriate.

Stage 3 – Local Plan Review: Draft Policies and Development Allocations – Further consultation (2022)

In November 2022 the council published the 'Bristol Local Plan Review – Draft Policies and Development Allocations – Further consultation' document for comment. A total of 449 responses were received.

The main issues raised and how they were addressed in the Local Plan are set out in the tables below.

Vision: Building a better Bristol

Vision

Table 169 - main issues raised on Vision and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
 Needs to be strengthened in relation to: climate change; transport; health and well-being; communities; and education. Specific reference needed to: delivering housing to support life-long living; prioritising use of derelict buildings, rather than building on greenfield land; prioritising good design and protection of city's heritage; provision of open space and public realm; promoting delivery of high-quality infrastructure; promoting employment and higher wages; and promoting a healthy living environment. Objection to number of new homes proposed to be built as considered to be an underestimation. 	The Local Plan Publication Version contains a positive vision for the future development of Bristol looking ahead to 2050. It addresses as succinctly as possible the key issues and needs facing the city, charting the expected progress on how they will be met. The vision is supported by a set of aims and objectives. These provide more detail on how the Local Plan will address the issues identified in the vision. References are provided to chapters in the Local Plan which contain policies with a particular focus on responding to the aims and objectives. The key matters raised in the 2018, 2019 and 2022 consultations have informed the vision, objectives, aims and / or policies of the Local Plan Publication Version.	

Main issues raised	How they were addressed
Failure of housing numbers in Vision to align with those in Objectives section.	
More explanation needed on meaning of 'development of rapid transit systems'. Focus should be on improvements to, and extensions of, existing sustainable and active transport networks.	
Clarity needed on meaning of 'urban living'.	
Historic England thought reference should be made to importance and relationship of historic environment in relation to the city's net zero commitment, its prosperity, place shaping, civic pride and well-being.	
Bath and North East Somerset Council thought vision should reflect potential requirement for new homes to be met outside city's boundary.	
South Gloucestershire Council identified no specific mention in Vision to importance of ecology or biodiversity.	

Objectives

Table 170 - main issues raised on Objectives and how they were addressed in the Local Plan

Main issues raised		Нс	How they were addressed		
•	meetineeds of add	rn that objective of ng development is prioritised ahead ressing climate and gical emergencies.	 Objectives will be pursued mutually. All policies in the Local Plan relevant to a proposal will be used in deciding planning applications. 		
•	Greate on:	er emphasis needed	•	Reque	sts for greater emphasis:
	0	growth of education sector.		0	Not considered appropriate to include as a key objective. In relation to higher education providers, the spatial implications of their growth are addressed in the Local Plan Publication Version. For example, one of the plan's aims refers to managing the development of student housing to safeguard existing communities whilst supporting thriving universities by meeting student accommodation needs. In addition, Policy DS1 'Bristol City Centre' promotes the continued consolidation and expansion on the University of Bristol's city centre campus site.
	0	How housing targets will be achieved, i.e. brownfield and / or greenfield development.		0	Addressed in the section on the plan's aims. This refers to a focus on brownfield land.
	0	Parks and green spaces.		0	Addressed in section on plan's aims which refers to protecting valued open spaces.
	0	Economy and jobs.		0	Addressed in section on plan's aims. This refers to enabling the sustainable growth of the economy.
	0	Healthy environment.		0	Addressed in section on plan's aims. This refers to the aim of achieving healthy neighbourhoods which achieve a liveable environment.

Main issues raised	How they were addressed	
Historic England sought an objective relating to the historic environment.	A new aim has been added to the Local Plan Publication Version which refers to cherishing the city's historic environment and harnessing the benefits of heritage- sensitive regeneration.	
Natural England suggested a target for greenspace provision and improving access to greenspace is included.	Targets for green infrastructure provision are included in the Local Plan Publication Version Policy BG1 'Green Infrastructure and biodiversity'. These relate to Natural England's Green Infrastructure Standards, part of its Green Infrastructure Framework launched in January 2023.	

<u>Aims</u>

Table 171 - main issues raised on Aims and how they were addressed in the Local Plan $\,$

Main issues raised		Но	How they were addressed	
•	Housing development given too much weight. Health and wellbeing and the environment should be prioritised.	•	Aims will be pursued mutually. All policies in the Local Plan relevant to a proposal will be used in deciding planning applications.	
•	Concern that brownfield development focus will mean that housing requirements unlikely to be met, taking into account heritage asset constraints and competing demands for employment land and green space provision.	•	Brownfield development focus considered appropriate and supported by the NPPF. Some areas of the existing Green Belt at Brislington, Bishopsworth and Ashton Vale are also proposed to be released to enable new homes to be delivered to meet the needs of the city.	
•	Concern that 'urban living' aim will have adverse implications for suburban character and retention of employment land, plus needs better definition.	•	Urban living seeks to balance making the most efficient use of urban land with achieving successful placemaking and liveability.	
•	Reference to open spaces should include aim to enhance as well as protect.	•	Reference to development enhancing the city's green and blue infrastructure is contained within Local Plan Publication	

Main issues raised	How they were addressed
	Version Policy BG1 'Green Infrastructure and biodiversity in new development'.
Reference to managing development of student accommodation to safeguard existing communities should be framed in relation to potential for harmful impacts.	 Reference to potential harmful impacts is considered more appropriately included within the relevant policy. For the Local Plan Publication Version this is Policy H7 'Managing the development of purpose-built student accommodation.'
Concern that aims difficult to achieve if city's employment and economic needs not sufficiently addressed.	Aims will be pursued mutually. The strategy for meeting the city's employment and economic development needs is set out in Local Plan Publication Version Policy E2 'Economic development land strategy'.
Historic England sought inclusion of historic environment aim.	A new aim has been added to the Local Plan Publication Version which refers to cherishing the city's historic environment and harnessing the benefits of heritage- sensitive regeneration.
 Natural England thought an aim should be for the plan to protect brownfield sites with high value for biodiversity. 	The protection of brownfield land with biodiversity value is considered more appropriately included within the relevant policy. For the Local Plan Publication Version this is Policy BG2 'Nature Conservation and Recovery'.

Housing need and requirement

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

Table 172 - main issues raised on Draft Policy H1: Delivery of new homes – Bristol's housing requirement and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 More detail needed on how neighbouring authorities have been engaged on meeting housing need outside city's boundaries. 	 Suitable engagement has taken place in the preparation of the Local Plan Publication Version and will continue under the duty to co-operate.
Objection to proposal that neighbouring councils should	 Approach considered appropriate for reasons set out in 2022 document's section

Main issues raised		How they were addressed	
	accommodate Bristol's shortfall in meeting its housing need.	entitled 'Bristol's capacity to deliver homes'.	
•	Concerns about infrastructure and environmental impacts resulting from accommodating housing requirement.	 Adequate infrastructure to support new development addressed by Local Plan Publication Version Policy IDC1 'Development contributions and CIL'. Environmental impacts covered by various policies in the Publication Version's Green Infrastructure and Biodiversity, Net Zero and Carbon Health chapters, amongst others. 	
•	Insufficient reference to meeting needs of specific groups, such as students and older people.	 Addressed in other Local Plan Publication Version policies including H4 'Housing type and mix', H7 'Managing the development of purpose-built student accommodation' and Policy H8 'Older people's and other specialised needs housing'. 	of
•	Should specify a target for amount of affordable homes to be delivered by 2040.	 Target added to Local Plan Publication Version Policy AH1 'Affordable housing provision'. 	
•	Concern housing target too high:	Housing target in draft policy considered appropriate for reasons set out in the	
	 Contrary to tackling climate change objective; 	consultation document. Approach maintained for Local Plan Publication Version H1 'Delivery of new homes – Bristol's housing requirement'.	
	 Lack of evidence it will reduce property prices; 	bristor's nousing requirement.	
	 Will lead to high density development not in character with Bristol. 		
•	Concern housing target too low: O Does not reflect assessed need;	 Housing target in draft policy considered appropriate for reasons set out in the consultation document. Approach maintained for Local Plan Publication Version H1 'Delivery of new homes – 	
	 Lack of evidence to support housing figure, e.g. published 	Bristol's housing requirement'.	

Main issues raised	How they were addressed
urban capacity assessment;	
 Should be higher to deliver more affordable homes and improve housing affordability; 	
 Brownfield land focus unlikely to be viable given recent lower delivery rates on these sites. 	
Bath and North East Somerset Council sought reassurance that, for the Publication Stage, evidence will demonstrate that BCC is maximising its urban capacity and that the assumed capacity for Bristol will be deliverable and viable.	Local Plan Publication Version H1 'Delivery of new homes – Bristol's housing requirement' is supported by appropriate published evidence. Publication Version Policy E2 'Economic development land strategy' sets out the scale and location of new workspace expected to be provided over the plan period to meet identified needs.
As there would be likely displacement of industrial and other employment uses from areas of growth and regeneration, they questioned whether adequate provision had been made within Bristol for displaced uses, as well as to meet newly arising employment demand over the plan period.	
North Somerset Council thought it important that BCC fully explores opportunities to meet its own housing need before considering ability of North Somerset to accommodate any residual need given its	This has been carried out, with the approach explained and supported by policies in the Local Plan Publication Version's 'Development Strategy' and 'Urban Living' chapters, amongst others.

Main issues raised	How they were addressed
own challenging housing target.	
Historic England raised concern at reference to existing allocations accommodating more homes. As likely to result in higher densities and increase potential for taller buildings, approach should be caveated to prevent inappropriate forms of development.	This reference has been maintained for the Local Plan Publication Version. It is considered suitable as complements the plan's Urban Living aim and policies. These seek to balance the efficient and effective use of land with aspirations for making quality places to live, successful placemaking, and a positive response to context.
 Environment Agency sought reference to flood risk as a constraint to meeting housing need. 	Not considered necessary to make specific reference to this issue.
Appendix 1 Bristol's housing need and requirement:	 Appendix 1 Bristol's housing need and requirement:
 Homes England concerned at lack of evidence provided on suitability, deliverability and developability of Table 2 sites. 	 Local Plan will be supported by a strategic housing land availability assessment.
 North Somerset Council sought reassurance that, at the Publication Stage, an updated housing delivery trajectory will be presented to support the urban capacity figure proposed. 	
Housing Needs Paper:	Housing Needs Paper:
 Fails to sufficiently set out exceptional circumstances for departing from 	 The Local Housing Needs Assessment for Bristol is being progressed based on the Government's standard method figure, informed by the November 2022

Main issues raised		How they were addressed
	Government's standard method.	housing needs paper.
0	Concern that references to student housing need are based on assumptions rather than evidence from city's further education providers.	 Approach in Publication Version policies H1 'Delivery of new homes – Bristol's housing requirement' and H7 'Managing the development of purpose-built student accommodation' supported by appropriate evidence.
0	Does not adequately deal with: relationship between city and	 Issues addressed in Local Plan Publication Version 'Development Strategy' policies as well as Policy H1
	surrounding administrative areas. affordability issues.	provision', Policy H8 'Older people's and other specialised needs housing' and Policy H7 'Managing the development of purpose-built student accommodation'. Policies also
	 housing needs of older people and students. 	supported by appropriate evidence, including Local Housing Needs Assessment.

Affordable housing

Draft Policy AH1: Affordable housing provision

Table 173 - main issues raised on Draft Policy AH1: Affordable housing provision and how they were addressed in the Local Plan

Main issues raised		Но	w they were addressed
•	Policy needs to be viability tested as may affect viability of development given other competing policy requirements.	•	Local Plan Publication Version supported by viability assessment.
•	Clearer definitions needed for social rent and affordable rent.	•	Detailed definitions provided in the council's Affordable Housing Practice Note, referred to in explanatory text to draft policy.

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Policy appears to provide flexibility to allow affordable homes for sale to be delivered as solely shared ownership units with no requirement for First Homes. Query whether this complies with government guidance.

- Affordable housing tenure proportion for general housing:
 - Objection to proposed reduction in tenure split percentage compared with adopted Local Plan.
 - Flexibility needed to allow split to be negotiated.
 - South West Housing Association Planning Consortium objected to affordable homes for rent not being included in the tenure split.
- Affordable housing tenure proportion for build to rent schemes in stand-alone blocks:
 - Objection to requirement for as

How they were addressed

- will accept affordable housing offers comprising First Homes or Shared Ownership units. Whilst Shared Ownership is the council's preferred route to Affordable Home Ownership this would not preclude consideration of proposals for First Homes, delivered in accordance with the proportion set out in the Written Ministerial Statement and Planning Practice Guidance, where a developer wishes to provide them. This approach has been maintained in Local Plan Publication Version AH1 'Affordable housing provision'.
- Proposed tenure mix in draft policy considered appropriate reflecting latest assessment of priority affordable housing need and national expectation to deliver affordable home ownership. Policy has been amended to allow flexibility in tenure requirements where required to increase affordable housing delivery. Approach maintained in Publication Version Policy AH1.

 Approach not contrary to planning practice guidance and maintained in Publication Version Policy BTR1 'Build to Rent housing'.

Main issues raised	How they were addressed
75% social rent and 25% shared ownership provision as contrary to national planning policy and guidance.	
 General provisions of policy: Objection to requirement for affordable housing to be transferred only to BCC's registered 	 General provisions of policy: The approach allows for affordable housing to be transferred to other affordable housing partners. Approach maintained in Publication Version Policy AH1.
providers. Reference to 'locally affordable price' is unclear on what the price is and how it would be implemented.	 Explanatory text to draft policy provides more information on locally affordable price. This is supported by additional detail in the Affordable Housing Practice Note, referenced in the policy. Draft policy approach maintained in Publication Version Policy AH1.
 Concern that policy does not provide sufficient flexibility to allow public subsidy where schemes are delivered as 100% affordable housing. 	 Draft policy has been amended to identify where public subsidy could be sought. Draft policy also makes reference to the Affordable Housing Practice Note providing guidance on policy implementation. Practice Note makes clear that where a development is being brought forward for 100% affordable housing by a Registered Provider the use of public subsidy will be supported for all units. Draft policy approach maintained in Publication Version Policy AH1.

Net zero and climate

Table 174 - main issues raised on Net zero and climate and how they were addressed in the Local Plan

Main issues raised	How they were addressed
The policies should be accompanied by evidence and viability testing.	 These policies reflect an up-to-date and extensive evidence base, including works commissioned by the council directly.

Draft Policy NZC1: Climate change, sustainable design and construction

Table 175 - main issues raised on Draft Policy NZC1: Climate change, sustainable design and construction and how they were addressed in the Local Plan

Main issues raised		How they were addressed
	Policy should require development to go beyond net zero to net negative.	The requirements in this suite of policies are robust and are a path towards net zero carbon development. Requiring development to go beyond mitigating its own impact and being designed to be adapted and resilient to the impacts of climate change is not considered proportionate or sound planning policy and could unduly impact viability.
	Policy should require buildings to be adaptable to future technologies.	 The policy now includes a reference to the need to adapt to use future technologies. Policy NZC2 includes requirements new relating to system flexibility also.
	Policy is overly onerous and too drastic a change from current policy which could impact the deliverability of affordable housing or high quality design.	• The policy is considered a proportionate balance between the need to address the climate emergency and the need for development. The current local plan policies were prepared over a decade ago and are in need of updating. These policies represent best practice that is recommended by national organisations and their requirements are key to achieving high quality design.
	Policy should set out an approach to retrofitting existing buildings.	 The plan includes a clearer and more supportive stance on retrofitting existing buildings, both in the chapter introduction and Policy NZC5.
	The policy should include mention of active travel and public transport.	 Promoting active travel and use of public transport in development design is now included. This is also addressed by the plan's transport policies.

Main issues raised	How they were addressed
The requirement for BREEAM Communities is overly onerous.	The requirement for BREEAM Communities is already in the Core Strategy.
The requirement for BREEAM Communities Assessment should be for proposals for significantly more than 100 units.	The threshold for BREEAM Communities has been increased to over 200 dwellings to better reflect its criteria and purpose.
BCC must provide evidence and justification if they wish to set standards higher than building regulations.	The requirement for these policies is clearly evidenced and justified through the council's evidence base.
PassivHaus certification should be a requirement of the draft policy, instead of being encouraged by the policy.	 PassivHaus is provided as an alternative route to compliance. By providing an existing, high quality certification scheme, the policy provides a streamlined approach for developers that retains a high level of environmental sustainability.
The water efficiency standard is overly onerous and must be supported by evidence.	Local authorities are permitted to require new developments to meet the tighter Building Regulations optional requirement of 110 litres/person/day where need is evidenced. Bristol Water's Final Water Resources Management Plan 2019 sets out a commitment to achieve this standard and the local plan supports this.
Policy should be strengthened with regard to flood risk mitigation.	 Flood risk mitigation is addressed through Local Plan Publication Version policies FR1-2 and in part NZC4.

Draft Policy NZC2: Net zero carbon development – operational carbon

Table 176 - main issues raised on Draft Policy NZC2: Net zero carbon development – operational carbon and how they were addressed in the Local Plan

Main issues raised	How they were addressed
The level of detail in the policy is too great and should be expanded on in an SPD.	 A practice note will be prepared to accompany this policy and provide further guidance on compliance.

Main issues raised	How they were addressed
The policy should provide more detail as to how to maximise renewable energy should be maximised in new schemes.	The council's future design guidance and practice note will address renewables in new development and provide guidance on maximising generation on site.
The requirements of the policy are overly onerous and will impact delivery of new development.	 Similar policy approaches NZC2 are already in use in other authorities in England and represents best practice.
Further 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.	The policy has been amended to make it clear that energy use intensity rather than carbon emissions is the metric used to assess compliance with the policy.
The principle of allowing offsetting where energy requirements cannot be met on-site should be removed. Developers may use this as an excuse to not meet EUI targets.	The policy recognises that in some instances it will not be feasible to meet the renewable energy generation requirements on site. The council will expect thorough evidencing of why these targets cannot be met before permitting offsetting. The council's position is that the EUI targets are achievable and should be met in most development.
More explicit guidance as to how offsetting criteria will be met is needed.	The council will publish further guidance to accompany the local plan that will detail the implementation of the policy suite.

Draft Policy NZC3: Embodied carbon, materials and waste

Table 177 - main issues raised on Draft Policy NZC3: Embodied carbon, materials and waste and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 The requirements of the policy are overly onerous and will impact delivery of new development. 	 The policy is considered a proportionate balance between the need to address the climate emergency and the need for development.
The policy should prioritise the reuse/repurposing of	The policy prioritises the renovation or retrofit of existing structures where

Main issues raised	How they were addressed
existing buildings.	appropriate subject to other considerations in the local plan.
There should not be a differing approach for	• The difference in approach for development of 5 storeys or more is because:
buildings of varying heights. The lesser requirements for taller buildings are not reflective of the higher level of embodied carbon generally in taller buildings.	 At this scale, all developments are expected to be multi-dwelling apartments rather than houses, representing a different building type.
generally in tailer buildings.	 Two criteria for higher risk buildings in the Building Safety Act are if they contain 2 or more dwellings and/or they are above 18m or 7 storeys tall. Buildings above this threshold face stricter fire safety requirements and are currently unlikely to be able to use timber construction to reduced embodied carbon.
The policy requirements relating to demolitions, waste and recycling are too imprecise and unclear for development management purposes.	The expected approach to reporting on demolitions, waste and recycling has been made clearer.
Specific reference should be made to circular economy principles.	The policy now embeds circular economy principles as key to meeting the requirements of the policy.

Draft Policy NZC4: Adaptation to a changing climate

Table 178 - main issues raised on Draft Policy NZC4: Adaptation to a changing climate and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
The policy is overly focused on overheating and flooding. The policy should be extended to refer to things like extreme weather events.	This policy has been redrafted in response to the November 2022 consultation. This has been done to make the policy more legible and reflective of comments raised. The policy now emphasises the importance of assessing context to inform design when considering climate adaptation.	

Main issues raised	How they were addressed	
	The policy recognises a wider range of climate change associated risks including extreme weather events.	
The policy should make greater reference to the use of green/blue infrastructure in adapting to a changing climate.	The policy makes more explicit reference to the role multifunctional green and blue infrastructure can play in adapting development to climate change.	
The policy is too risk focused and not sufficiently strategic in scope.	The policy requires development to be designed in a way that is informed by its context. This includes identifying local needs and opportunities and whether development is in a location that could exacerbate climate change risks in the surrounding area or elsewhere in the city. The policy also highlights how green/blue infrastructure and other climate adaptation measures can have impacts beyond their immediate location and that this will be viewed favourably by the council in planning decisions.	
The use of TM59 analysis methodology should be included in the policy.	The use of TM59 analysis methodology is now included in the policy's explanatory text.	
 Links between the adaptation strategy and flood risk assessment should be made explicit. 	The policy requires a summary of the approach to flood risk and drainage to be included in the adaptation strategy as well as a separate Flood Risk Assessment.	

Draft Policy NZC5: Renewable energy development

Table 179 - main issues raised on Draft Policy NZC5: Renewable energy development and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Need for policy to existing renewable generation installar	energy of new renewable energy generating

Main issues raised		How they were addressed	
			where this would require planning permission.
•	Stronger policy needed to support renewable energy development, e.g. make reference to support for solar panels and offshore wind.	•	The policy has been strengthened to make clear that renewable energy generation is supported across the city, including at the individual building level.
•	Need for a strategic approach to provision of renewable energy installations in order to avoid piecemeal proposals and overconcentration in an area.	The policy provides a supportive framework for development of renewable energy at the city. Avonmouth is considered to be area of particular suitability for these us and so higher concentrations will be expected in this area. All proposals will subject to the other policies in the plan	
•	Natural England thought the council should explore the most suitable and deliverable options for renewables in different parts of the plan area, having regard to ecology impacts. They also considered that commercial development could be encouraged to use solar panels for energy generation, or green roofs to reduce demand for air conditioning.		assessed to avoid issues such as this. The plan's focus on Avonmouth is informed by work such as the City Wide Energy Study and the fact that the area already hosts significant renewable energy generation assets.
•	South Gloucestershire Council notes the plan's approach to focus renewable energy capacity within Avonmouth and Bristol Port area. As this approach could have direct implications for South Gloucestershire continued dialogue is requested.	•	The council is committed to continuing dialogue with its neighbouring authorities and recognises South Gloucestershire's position as a stakeholder regarding renewable energy generation in the Avonmouth and Bristol Port area.

Biodiversity and nature recovery

Draft Policy BG1: Green Infrastructure and biodiversity in new development

Table 180 - main issues raised on Draft Policy BG1: Green Infrastructure and biodiversity in new development and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
 Objection to assumption in introductory text that brownfield sites have less biodiversity value than greenfield sites. 	Introductory text revised for Local Plan Publication Version Policy BG1 'Green Infrastructure and biodiversity in new development'.	
 Clarify role of West of England Joint Green Infrastructure Strategy 2020-2030 and Nature Recovery Network in relation to Local Plan. 	 Publication Version Policy BG1 amended. Reference is now made to ensuring the integrity and connectivity of the Nature Recovery Network and wider network of green and blue infrastructure across the city will be maintained, protected, enhanced and restored. This reflects priorities set out in the West of England Joint Green Infrastructure Strategy. 	
 Policy wording lacks precision about requirements expected from proposals. 	Policy considered to be sufficiently clear with specific examples provided in policy text.	
 Policy onerous with potential negative impacts on housing delivery. 	 Approach considered appropriate for reasons set out in introductory text. 	
 Strengthen policy with additional references to / emphasis on: nature-based flood management, sustainable drainage, tree planting, food growing, health and wellbeing, mitigating the urban heat island effect, air quality, active travel, ecological and climate change emergency declaration, incorporating green infrastructure into all new development, replacing 'expected' and 		

Main issues raised	How they were addressed
other types of conditional language with 'must', protecting and enhancing hedgerows and urban hedges.	
Natural England's Green Infrastructure Framework should be referenced.	Reference made in Publication Version Policy BG1.
Policy does not allow for mitigation where it is not possible or desirable to maintain existing green infrastructure features.	 Policy approach considered appropriate for reasons set out in its introductory text. Reference is made to Green Infrastructure Statements being submitted with planning applications. These will provide an opportunity for the planning applicant to set out how their proposal responds to the expectations of the policy.
Clarity sought on the reference to appropriate standards for ensuring major development proposals meet the policy's provisions.	 Publication Version Policy BG1 clarifies approach regarding standards for green infrastructure provision. These relate to Natural England's Green Infrastructure Standards, part of its Green Infrastructure Framework launched in January 2023.
Natural England considered that:	Natural England's comments:
 Scope of draft policy should be expanded to incorporate strategic aims of plan relating to nature and green infrastructure. 	o Publication Version Policy BG1 amended. Introductory text now refers to the West of England Joint Green Infrastructure Strategy and how it sets out green infrastructure priorities and project at a subregional level. The policy wording now refers to ensuring the integrity and connectivity of the Nature Recovery Network and wider network of green and blue infrastructure across the city will be maintained, protected, enhanced and restored. This reflects priorities set out in the West of England Joint Green Infrastructure Strategy.
 Policy provisions were unclear as to 	 Policy provisions considered to set out clear expectations for what

Main issues raised		How they were addressed		
	whether they were mandatory or matters that developments should try to achieve.		proposals should achieve.	
0	Application of urban greening factor was most effective for promoting green infrastructure.	0	Publication Version Policy BG1 amended to make reference to this as part of Natural England's Green Infrastructure Standards.	
0	Minimum standards for the provision of integrating green infrastructure features should be included.	0	Publication Version Policy BG1 amended to make reference to Natural England's Green Infrastructure Standards.	
0	Policy wording should be amended so that developments take 'all' available opportunities to deliver multifunctional benefits relating to green infrastructure.	0	Publication Version Policy BG1 amended to make reference to this.	

Draft Policy BG2: Nature Conservation

Table 181 - main issues raised on Draft Policy BG2: Nature Conservation and how they were addressed in the Local Plan

M	ain issu	es raised	How they were addressed
•	Bristol clarity	Parks Forum sought on:	 Bristol Parks Forum comments: Mitigation considered to be readily
	0	definition of	understood term.
		mitigation.	 Local Plan Publication Version Policy
	0	how policy will help	BG2 'Nature Conservation and
		to maintain and	Recovery' amended. Reference is
		enhance the nature	now made to development being

Main issues raised	How they were addressed	
network.	expected to take all available opportunities to connect to or enhance the integrity of the Nature Recovery Network and wider ecological networks.	
Strengthen policy with additional references to / emphasis on: replacing 'expected' and conditional language with 'must'; specific types of biodiversity improvement such as bee and swift bricks; producing an SPD to ensure effective delivery of biodiversity improvements; making clear Bristol Avon is functionally connected to the River Severn and Avon Gorge.	Draft policy provisions and references considered reasonable and proportionate. Approach maintained for Publication Version Policy BG2.	
 Reference to development which would result in significant harm to biodiversity which cannot be appropriately mitigated 'will not' be permitted inconsistent with the NPPF's use of 'should not'. 	Draft wording considered appropriate.	
Natural England thought policy should refer to nature recovery rather than conservation to better recognise wider expectations placed on plans to strategically plan	Title of policy amended for Local Plan Publication Version. Reference is also now made in the policy to development being expected to take all available opportunities to connect to or enhance the integrity of the Nature Recovery Network and wider ecological networks.	

Main issues raised	How they were addressed
for the natural environment.	
 North Somerset Council thought the policy should distinguish between the hierarchy of international, national and locally designated sites. 	Amended Publication Version Policy BG2 addresses this.

Draft Policy BG3: Achieving Biodiversity Gains

Table 182 - main issues raised on Draft Policy BG3: Achieving Biodiversity Gains and how they were addressed in the Local Plan

Main issues raised	How they were addressed
 Clarification sought on aspects of policy and its implementation: What period management plans need to cover and their monitoring. Where legal responsibility for delivering biodiversity net gain lies if landowner and developer are different. Criteria used to determine if off-site biodiversity net gain or compensation is considered to be an acceptable approach. 	 Clarifications sought: Reference to management plans and monitoring removed from Local Plan Publication Version Policy BG3
 How habitat management measures in Biodiversity Gain Plans would be enforced. 	

Main issues raised		How they were addressed	
questione for biodive already in	teness of policy d given provisions ersity net gain cluded in ent Act 2021.	•	Policy considered appropriate for reasons set out in its introductory text.
achieving	bout viability of 10% biodiversity n small sites.	•	Policy reflects the Environment Act 2021.
	_	•	Policy reflects the Environment Act 2021. Flexibility provided, e.g. by allowing off-site measures if on-site solutions cannot be achieved.
suggested developer expected 10% biodi on site or requireme determine	s should be to either achieve versity net gain	•	Policy approach considered appropriate and in accordance with the Environment Act 2021.
	ty net gain target higher than 10%.	•	Policy target considered suitable. Text has been added to Publication Version Policy BG3 to encourage developments to secure greater than the minimum level.
developm	icy approach for ent impacting on oodland and ees.	•	Text has been added to Publication Version Policy BG3 to make clear that impacts on irreplaceable habitats cannot be mitigated by biodiversity net gain.
allowing o measures	bout approach off-site net gain as risks exporting ty away from s needed.	•	Draft policy approach considered appropriate and reflecting the Environment Act 2021. Text has however been added to this section of Publication Version Policy BG3 to emphasise that off-site biodiversity gain should be provided in a location as close as feasible to the site that would contribute to the Nature Recovery Network and, where possible, have a meaningful ecological relationship to the development.
	st resort' in o off-site habitat	•	Text has been added to Publication Version Policy BG3 to clarify that these

Main issues raised	How they were addressed	
payment compensation.	circumstances would be where no suitable off-site location can be found.	
Clarity how 'close' off-site biodiversity net gain should be to the site.	Text has been added to Publication Version Policy BG3 to state that off-site biodiversity gain should be provided in a location as close as feasible to the site that would contribute to the Nature Recovery Network and, where possible, have a meaningful ecological relationship to the development.	
In relation to directing proposed habitat and compensation measures towards opportunity projects, the Bristol Avon Catchment Plan 2022-2027 could be referred to.	 Text has been added to Publication Version Policy BG3 to explain that newly created habitat and compensation measures will be directed towards opportunity projects for biodiversity restoration identified within the West of England Joint Green Infrastructure Strategy or locations that would enhance wider ecological networks identified by the Nature Recovery Network or the emerging Local Nature Recovery Strategy. 	
Natural England suggested Bristol's parks and greenspaces should be included as habitat banks for biodiversity net gain units to ensure biodiversity impacts by developments are mitigated in areas close to proposals.	It is considered that this issue will be addressed through text added to Publication Version Policy BG3. This explains that newly created habitat and compensation measures will be directed towards opportunity projects for biodiversity restoration identified within the West of England Joint Green Infrastructure Strategy or locations that would enhance wider ecological networks identified by the Nature Recovery Network or the emerging Local Nature Recovery Strategy.	

Draft Policy BG4: Trees

Table 183 - main issues raised on Draft Policy BG4: Trees and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
 Request for more emphasis	 Wording of draft policy considered	
on / reference to: role of	appropriate, proportionate and reflecting	
trees in climate resilience;	national planning policy. Approach	
their food growing	maintained for Local Plan Publication Version	
potential; 'requiring'	Policy BG4 'Trees'.	

Main issues raised		Hov	v they were addressed
	development to meet the policy's provisions rather than 'expecting'; highlighting importance of trees in national policy; the Ancient Woodland and Ancient Tree Inventory; Bristol's urban forest as part of the wider West of England Nature Recovery Network.		
•	Tree canopy cover target needed.		Draft policy makes reference to increasing tree canopy cover and this is maintained in Local Plan Publication Version Policy BG4.
•	Amend policy to require new streets to be tree lined only where feasible or viable.		It is considered that this is addressed in the draft policy's reference to development taking practicable opportunities to deliver tree lined streets.
•	Objection to tree replacement standard which indicates that trees with a trunk diameter of less than 15cm need not be replaced.		Publication Version Policy BG4 'Trees' amended so that a replacement tree will be needed for a tree with a diameter of 7-19.9cm.
•	Cross-reference to biodiversity net gain policy.		Publication Version Policy BG4 'Trees' amended to explain relationship to Policy BG3 'Achieving Biodiversity Gains'.
•	Amend policy to state that replacement tree provision should only be acceptable where tree loss or damage is essential for safety.		Draft policy referred to replacement tree provision being acceptable where tree loss or damage is essential to allow for appropriate development. This wording is considered suitable and proportionate and is maintained in Publication Version Policy BG4.
•	Replacement trees should be provided within one mile of development site.		Draft policy's reference to replacement trees being located as close as possible to the development site is considered appropriate and maintained in Publication Version Policy BG4.

Main issues raised	How they were addressed
 Approach to ancient woodland and ancient or veteran trees: Strengthen policy to not permit any development which affects ancient or veteran trees. 	Draft policy's reference to development which would result in the loss of ancient or veteran trees not being permitted is considered appropriate and maintained in Publication Version Policy BG4.
 Policy inconsistent with NPPF which allows development for exceptional reasons. 	
Policy requirements should only be applicable where feasible and viable, and that a financial contribution should be acceptable if not possible to provide replacement trees on-site.	 Draft policy considered appropriate for reasons set out in explanatory text. Policy also makes reference to the council's Planning Obligations Supplementary Planning Document which sets out the approach for off-site tree provision. Approach maintained for Publication Version Policy BG4.
Environment Agency thought the policy should be strengthened to make clear that any tree placement that impacts operational access to a designated main river or results in an increase in flood risk must be avoided.	It is considered that this issue is addressed in Local Plan Publication Version Policy BG5 'Biodiversity and access to Bristol's waterways'.

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

Table 184 - main issues raised on Draft Policy BG5: Biodiversity and access to Bristol's waterways and how they were addressed in the Local Plan

Main issues raised		How they were addressed	
•	More precise standards and criteria needed to ensure policy can be used for assessment of proposals.	•	Draft policy wording considered sufficiently clear and approach maintained in Local Plan Publication Version Policy BG5 'Biodiversity and access to Bristol's waterways'.

Main issues raised	How they were addressed
Too great a focus on walkways; increased emphasis needed in relation to biodiversity and nature recovery.	 Issue considered to be adequately addressed in draft policy's reference to proposals conserving and enhancing the nature conservation value of waterways and adjacent land, including both habitats and species, and deliver biodiversity net gain. Approach maintained in Publication Version Policy BG5.
 Policy should reflect increased potential for active and leisure uses. 	 Issue considered to be addressed in draft policy's reference to proposals maintaining, enhancing and creating suitable, high-quality publicly accessible green infrastructure for walking and cycling.
Policy too restrictive as would prevent any development that does not conserve the nature conservation value of waterways and adjacent land, regardless of biodiversity net gain provision.	 Draft policy approach considered appropriate for reasons set out in its introductory text. Approach maintained for Publication Version Policy BG5.
 Environment Agency felt the policy should be revised to: 	Environment Agency comments:
 Ensure new development is set back from river. 	 It is considered that this is addressed with the draft policy's references to proposals conserving and enhancing the nature conservation value of waterways and adjacent land, and enabling long-term safe access, stewardship and maintenance of waterways and watersides. It will also be addressed by Local Plan Publication Version Policy BG1 'Green Infrastructure and biodiversity in new development'. This states that the integrity and connectivity of the Nature Recovery Network and wider network of green and blue infrastructure across the city will be

Main issues raised	How they were addressed
	maintained, protected, enhanced and restored.
	Similarly, Publication Version Policy DPM1 'Delivering well-designed, inclusive places' sets out the ten characteristics of well-designed places. This includes 'Nature' and sets out that existing blue/green infrastructure in and around the site should be retained and integrated into development proposals.
 Safeguard land to assist with delivery of emerging Bristol Avon Flood Strategy. 	 This is addressed in Local Plan Publication Version Policy FR2 'Bristol Avon Flood Strategy'. This states that development located within or adjacent to areas that are essential for the delivery of future flood defences will be expected to accommodate space for and / or deliver flood protection infrastructure required as part of the development of the area.

Food sustainability

Draft Policy FS1: The provision of allotments

Table 185 - main issues raised on Draft Policy FS1: The provision of allotments and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
Policy should seek allotment provision from commercial developments.	 Policy sets out requirement for new large residential developments to provide allotment space for residents. Not considered reasonable to seek provision from commercial developments as they do not lead to an increase in residents or deficiency in supply. 	
 Expand policy to protect community growing spaces / gardens, food growing enterprises, smallholdings and social eating spaces. 	 Addressed in Local Plan Publication Version Policy FS3 'The protection of existing food growing enterprises and allotments'. 	

Main issues raised	How they were addressed	
 Concern that allotment provision will decrease area that can deliver housing. 	 Proposed approach considered reasonable and supported by national planning policy. 	
Policy needs to be assessed for any impacts on overall viability of development.	Local Plan supported by viability assessment.	
 Any offsite allotment provision and financial contributions should be used to benefit the local area. 	 Approach to planning obligations addressed in Local Plan Publication Version Policy IDC1 'Development contributions and CIL' and Planning Obligations supplementary planning document. 	
 60 dwelling threshold: Lack of justification; Should be lower – 20 suggested. 	 Justification for 60 dwelling threshold provided in explanatory text to policy. 	
 For larger developments, allotment provision should be increased relative to their size, i.e. no upper ceiling of 250m². 	 Confirmed in explanatory text to policy with its reference to larger developments providing proportionately more allotment space. 	

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

Table 186 - main issues raised on Draft Policy FS2: Provision of food growing space within new developments of all scales and how they were addressed in the Local Plan

Main issues raised		How they were addressed	
•	Objection to lack of development threshold above which on-site food growing space would be required.	•	Approach considered reasonable and supported by national planning policy.
•	Details needed about the food growing space to be incorporated.	•	Additional detail provided in explanatory text to Local Plan Publication Version Policy FS2 'Provision of food growing space in new developments'.
•	This type of provision should be counted as an open space contribution	•	Supporting text to policy explains that provision of food growing space may be seen as a part of a development's wider green

Main issues raised	How they were addressed
and not additional to this.	infrastructure. Open space contributions are addressed in Local Plan Publication Version policy GI A 'Open Space for Recreation'.
 Policy should require remediation of land to be used for food growing. 	 Remediation of land addressed in Local Plan Publication Version policy HW1B 'Contaminated land'.
Clarity sought on:	Clarifications sought:
 definition of terms 'long term occupation', 'suitable space', and 'appropriate size, quality and design'; whether policy applies to student accommodation schemes. 	 Additional detail on application of policy provided in explanatory text to Local Plan Publication Version Policy FS2 'Provision of food growing space in new developments'. Purpose-built student accommodation schemes which house term time-only occupants would be unlikely to be considered as being intended for permanent or long-term occupation.
Policy should specify how much space is required per dwelling or person.	 A space standard approach not considered appropriate as the ability of residential development proposals to provide food growing opportunities will depend on site / location-specific considerations. Instead, the policy requires applicants to demonstrate how their proposals have sought to incorporate food growing opportunities into their wider landscaping and design.

Draft Policy FS3: The protection of existing food growing enterprises

Table 187 - main issues raised on Draft Policy FS3: The protection of existing food growing enterprises and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
 Policy lacks justification, clarity and is inconsistent with national planning policy. 	 Approach considered reasonable and supported by national planning policy. 	
Expand policy to:	Policy expansion requests:	
 Protect local community gardens; 	 Supporting text to policy makes reference to community gardens. 	

Require protection Almost all of Bristol is designated as of best and most urban land. There is only a very small area of the best and most versatile versatile soils; agricultural soils within Bristol's boundaries. This is largely already developed, occupied by food growing uses or covered by other protective designations. The approach to protect existing food growing enterprises expands protections to food growing enterprises across the city. Specify amount of The policy relates to the protection of food growing land existing food growing enterprises and being made so this is not relevant to the policy's available for active requirements. cultivation ward by ward; Preserve food Existing wording considered reasonable and sufficient. growing enterprises even if they are temporarily considered nonoperational. More explanation needed Existing wording considered appropriate. on what would be Supporting text to the policy provides more

Shopping, services and the evening economy

'unacceptable impact'.

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

Table 188 - main issues raised on Draft Policy SSE1: Supporting Bristol's centres – network and hierarchy and how they were addressed in the Local Plan

explanation on potential impacts.

Main issues raised	How they were addressed
15-minute city references: more detail / clarification sought, e.g. on its meaning; how key services would be located within a 15-minute distance; how it applies to people with mobility issues; whether it applies to	 Policies in the Local Plan Publication Version chapter on 'Centres, shopping and the evening economy' support the broad aim of a 15-minute city where facilities and services are close to people's homes.

Main issues raised	How they were addressed
hospitality / evening economy uses.	
 Proposed hierarchy of centres: 	Proposed hierarchy of centres:
 Bath and North East Somerset Council emphasised importance of dialogue on implications for local centre provision in development proposals in B&NES close to Bristol. 	 Appropriate dialogue has taken place in preparing the Local Plan Publication Version.
o South Gloucestershire Council sought clarity on: a) where areas for growth and regeneration sit in centre hierarchy; b) the scale and type of town centre development likely to be needed given this could affect potential for new centres in South Gloucestershire; and c) whether primary and secondary shopping areas for town, district and local centres will be retained.	 The draft policy sets out the network and hierarchy of centres in Bristol. Where centres are also located in areas of growth and regeneration the relevant policies for centres continue to apply. Approach maintained for Publication Version policy. The type and scale of development is set out in the policy and its supporting text. Primary shopping areas referred to draft policies SSE1 and SSE2, with the approach maintained for the Local Plan Publication Version. Secondary shopping frontages no longer supported in national policy.
 Concern that policy does not address noise pollution and promotes potentially anti-social activities. 	 Issue covered by a number of Local Plan Publication Version policies including HW1 'Pollution control and water quality' and HW1A 'Noise'. Policy SSE3 'Supporting

Main issues raised	How they were addressed
	Bristol's evening, night-time and culture economy' also expects new evening and night-time economy uses to be neighbourly, having regard to the character of the centre where they are proposed. Policy DPM1 'Delivering well-designed, inclusive places' also requires development to providing a safe environment for future occupiers.
Approach to encouraging residential uses:	Approach to encouraging residential uses:
 Needs to be more restrictive so that residential uses do not harm commercial or cultural function of centres, e.g. require applicants to demonstrate excess supply of commercial units prior to residential uses being allowed. 	 Issue addressed in draft Policy SSE3 'Supporting Bristol's evening and night-time economy' and HW1 'Pollution Control and Water Quality' in connection with the 'agent of change' principle.
 Clarify whether residential development includes build to rent and student accommodation schemes. 	 Clarification considered unnecessary as policy's main aim is to protect primary shopping areas from inappropriate change.
Comments on proposed centres:	Comments on proposed centres:
 Whiteladies Road – boundary should include additional areas to the south towards Oakfield Road and the Royal West of England Academy. 	 Whiteladies Road boundary considered to reflect extent of the centre.
Ridingleaze –Lawrence Weston	 Policy is intended to identify Ridingleaze District Centre as part of the retail

Main issues raised	How they were addressed
Neighbourhood Planning Forum suggest reference is made to the centre's regeneration plan being produced by the forum.	hierarchy. The local plan refers to the Lawrence Weston Neighbourhood Development Plan.
 Alma Vale Road, Clifton – boundary should be drawn to include entire length of shop frontages on both sides of Alma Vale Road. 	 Alma Vale's boundaries have been amended.
 Filwood Broadway – Knowle West Regeneration Residents Planning Group suggest this should be a district rather than local centre. 	 Filwood Broadway currently has the characteristics of a local centre.
 St. Peter's Rise, Bishopsworth – boundary should include shops further back along Bishopsworth Road and at junction with Bridgewater Road. Environment Agency thought designation should be revisited due to a culverted water course passing through area. 	 The boundary at St Peter's Rise is considered to accurately reflect the extent of the centre.
 `Two Mile Hill Road boundary map not included in Appendix 2. 	 Boundaries will be included in policies map, and a reference to Kingswood Town Centre has been added.

M	ain issues raised	Но	w the	ey were addressed
	To assist in application of sequential test, South Gloucestershire Council advised policy should refer to Two Mile Hill Road centre as being part of Kingswood Town Centre and having proximity to other South Gloucestershire centres.			
•	New centres suggested for inclusion in the network of centres: Whiteladies Road South; Kellaway Avenue; Ashley Down Road; Cotham Road South; Broad Plain/Temple Quay	•	O K to	centres: Cellaway Avenue has now been added to he list of local centres. Ashley Down Road has now been added is a local centre. Cotham Road South was added as a local entre. The southern end of Whiteladies Road east Belgrave Road has a different oncentration of Use Class E(a) uses in omparison to the section of Whiteladies to add identified in the centre. Broad Plain / Temple Quay is part of the ity centre.
•	Approach to creation of new centres: National Highways felt policy should include reference to incorporation of permeable and sustainable transport networks to facilitate ease of movement across new centres.	•		e matters addressed in the Local Plan's sport policies.

Draft Policy SSE2: Development in Bristol's Centres

Table 189 - main issues raised on Draft Policy SSE2: Development in Bristol's Centres and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Policy should better reflect the need to value local centres as areas for local services.	Importance of local centres reflected in approach of draft policies SSE1 and SSE2.
Objection to policy's general opposition to residential uses within ground floor frontage of primary shopping areas. Contradiction between this policy and Bristol City Centre Framework, with the latter supporting residential development which complements retail uses within primary shopping areas.	Draft policy explains importance of protecting primary shopping areas, therefore approach considered appropriate and maintained in Local Plan Publication Version.
Proposal for environmental enhancement to be provided as part of major development proposals should be flexible in terms of enhancements sought.	Policy considered proportionate and flexible.

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

Table 190 - main issues raised on Draft Policy SSE3: Supporting Bristol's evening and night-time economy and how they were addressed in the Local Plan

Main issues raised	Н	How they were addressed	
 Policy should also opportunities for night venues. 	• •	Addressed in draft policy which supports proposals which contribute to the vitality and viability of Bristol's evening and night-time economy.	
 Concern that pooperation of lat businesses and interests over the 	e-night commercial	Draft Policy SSE3 expects new evening and night-time economy uses to be neighbourly, having regard to the character of the centre where they are proposed. Also relevant will	

Main issues raised	How they were addressed
and wellbeing of residents.	be Local Plan Publication Version policies in the 'Health, wellbeing and food sustainability' chapter, including HW1 'Pollution control and water quality' and HW1A 'Noise'.
Policy wording on cultural venues should be expanded to include specific reference to 'theatres and other performance venues'.	 Policy wording on cultural venues would include theatres and other performance venues.

Draft Policy SSE4: Town Centre First Approach to Development

Table 191 - main issues raised on Draft Policy SSE4: Town Centre First Approach to Development and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
Concern that approach places undue limits on the flexibility of Use Class E uses, e.g. in relation to requiring impact assessments.	Policy aim of retaining existing Use Class E uses within identified centres considered appropriate.	
Proposed sequential approach: for main town centre use applications equal to or less than the amount of floor space currently present on the site, sequential approach should not apply.	Sequential approach set out in draft policy considered appropriate and in accordance with national planning policy.	

Draft Policy SSE5: Temporary Uses in Centres

Table 192 - main issues raised on Draft Policy SSE5: Temporary Uses in Centres and how they were addressed in the Local Plan $\,$

Main issues raised	How they were addressed	
Objection to blanket ban on use of vacant sites for car parking as they could be useful for accessibility reasons (e.g. for older)	 Draft policy considered appropriate for reasons set out in explanatory text. Approach maintained for Local Plan Publication Version. 	

Main issues raised	How they were addressed
people) without undermining sustainable travel.	
 Requiring meanwhile uses to enhance local character and amenity of surrounding area felt to be onerous; neutral impacts should be acceptable. 	Draft policy felt to be appropriate as it is considered these uses should have a positive impact.

Draft Policy SSE6: Retaining and Enhancing Markets

Table 193 - main issues raised on Draft Policy SSE6: Retaining and Enhancing Markets and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
Proposals for new street or open markets: wording should state that new markets should complement local businesses and take other food / beverage offers nearby into account.	 The policy is supportive of the creation of new markets in the correct locations and further provisions are not considered necessary. 	

Draft Policy SSE7: Provision of public toilets

Table 194 - main issues raised on Draft Policy SSE7: Provision of public toilets and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
 Policy wording should be strengthened to ensure access is not restricted by any means and that facilities are appropriately maintained. 	Draft policy refers to toilets being located at readily accessible parts of the development which facilitate public access.	
Requirement for public toilet provision should only apply where it is viable, deliverable and where it would not have a negative effect on amenity.	 Approach considered appropriate for reasons set out in supporting text. Considerations of amenity are addressed in policies within the Local Plan Publication Version's 'Design and conservation' chapter. 	

Main issues raised	How they were addressed
Building Regulations requirements to provide 'changing places' toilets should not make a development unacceptable in situations where it cannot be achieved, e.g. due to building heritage considerations.	Material considerations always taken into account in assessment of planning applications.
Objection to requirement for 24-hour access to facilities, given likely staffing costs and implications relating to crime prevention strategies.	Bristol is a 24-hour city which is recognised within the local plan.
Closed public toilets should be reopened and reinstated by the council before developers are required to provide new facilities.	This policy concerns the provision of new toilets as a result of development.
Clarification sought on reference to 'open to the public' – define what is meant and clarify who will be allowed to use new facilities.	The term is considered clear.

Design

Proposed approach to the preparation of local design guides or codes

Table 195 - main issues raised on Proposed approach to the preparation of local design guides or codes and how they were addressed in the Local Plan

M	ain issues raised	How they were addressed	
•	Approach not in line with Government's National Model Design Code guidance.	 In light of changes to national planning policy Bristol City Council will prepare design guides and codes. These will support the policies in the Local Plan Publication Version's 'Design and conservation' chapter and provide more detailed guidance for developers as to what is expected in terms of 	

Main issues raised	How they were addressed
	design. A prospectus of this guidance will be appended to the Publication Version.

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

Table 196 - main issues raised on Draft Policy DC A: Delivering well-designed, inclusive places and how they were addressed in the Local Plan

Main issues raised		How they were addressed	
•	Lack of reference to how design proposals should be developed through engagement with local communities.	Text has been added to Local Plan Publication Version Policy DPM1 'Delivering well-designed, inclusive places' which states that major applications will be expected to show how the design of development has been informed by and responded to early, proactive and effective engagement with the community.	
•	Inclusion of specific matters sought: O Healthy Streets Approach should be adopted as part of the formal assessment of street design and transport schemes. O Text needed to support the creation of new parks and green spaces.	proactive and effective engagement with t	
•	Policy too 'high level' to provide adequate detail for guiding for new	 The Local Plan Publication Version includes a number of policies with relevance to design matters and which, taken together, provide sufficient detail for assessing planning 	

Main issues raised	How they were addressed		
development proposals.	applications.		
 Use of 'beautiful' inappropriate as it is a subjective term. 	Support for use of 'beautiful' found in NPPF.		
 Policy should require developers to undertake post-completion checks to ensure development meets original design specification. 	Post-completion issues are a planning enforcement matter.		
Sport England advocated reference to its Active Design guidance and developer's checklist.	 Ensuring development proposals promote or provide opportunities for physical activity are addressed in a number of Local Plan Publication Version policies including Policy DPM1 'Delivering well-designed, inclusive places', Policy T1 'Development and transport policies' and Policy T6 'Active travel routes'. 		
 Section on criteria for achieving well-designed proposals: 	 Section on criteria for achieving well- designed proposals: 		
 Reference should be made to providing new green spaces and ensuring they are accessible and maintainable by residents. 	 Text has been added to this section of Local Plan Publication Version Policy DPM1 'Delivering well- designed, inclusive places' to refer to providing blue/green infrastructure and enabling long term stewardship of buildings and spaces. 		
 Clarity sought on how 'inclusive' is to be interpreted. 	 'Inclusive' is a term used in the NPPF. Its normal everyday meaning would be used when applying the policy. 		
 National Grid thought the policy should be amended to ensure existing site constraints are respected, particularly relating to utilities. 	 Text has been added to the 'Context' element of this part of Policy DPM1 which explains that good design demonstrates an understanding and respect for an area's unique built, natural and cultural characteristics. 		

Main issues raised	How they were addressed		
 Natural England considered that the requirement for inclusive design should reference green infrastructure designed to be safe and accessible to all. 	 Text has been added to the 'Nature' element of this part of Policy DPM1 to explain that good design retains, integrates and provides blue/green infrastructure in and around the site, while the 'Public and communal spaces' element now includes reference to creating safe, secure, and attractive settings for the spaces. 		
Section on Urban living:	Section on Urban living:		
 Concern that the text on optimising densities implies that liveability can be compromised to achieve housing targets. 	 The aim of Local Plan Publication Version Policy DPM1 'Delivering well- designed, inclusive places' is to ensure a balance is achieved between optimising site densities and achieving successful placemaking and liveability. Text has been added to DMP1 to provide more detail on the considerations that should ensure liveability in proposals for new dwellings. 		
 Minimum space standards should be included to ensure liveability, including standards for communal and play spaces. 	 This is addressed by Local Plan Publication Version Policy DC1 'Liveability in residential development including space standards and private outdoor space.' 		
 South Gloucestershire Council considered that the policy wording could be strengthened to ensure densities are optimised. 	 This is addressed by Local Plan Publication Version policies UL1 'Effective and efficient use of land'; UL2 'Residential densities'; and DC1 'Liveability in residential development including space standards and private outdoor space'. 		
Section on Mixed-use	Section on Mixed-use development:		
development: O A mix of uses should only be required where feasible and appropriate to the	 NPPF advocates mixed-use development as a means of securing an efficient use of land and healthy, inclusive and safe places. Local Plan Publication Version Policy DPM1 		

Main issues raised		How they were addressed			
		site's context.			'Delivering well-designed, inclusive places' expects major development proposals to provide or contribute to an appropriate mix of uses.
	0	Clarity sought on how an appropriate mix of uses should be established for a site.		0	Design and Access Statements which accompany major development proposals should address how an appropriate mix of uses has been provided or contributed to.
•		n on local character stinctiveness:	•		n on local character and tiveness:
	0	Policy should recognise those circumstances where a scheme which would cause some harm to local character or distinctiveness is nevertheless acceptable given its overall planning merits.		0	The second paragraph of Draft Policy DC A which referred to development not being permitted where it would be harmful to local character and distinctiveness has been removed from Local Plan Publication Version Policy DPM1 'Delivering well-designed, inclusive places'.
	0	Emphasis should be on requirement for development to mitigate harm rather than refusing schemes that will result in harm.		0	The second paragraph of Draft Policy DC A which referred to development not being permitted where it would be harmful to local character and distinctiveness has been removed from Publication Version Policy DPM1.
•		n on Co-ordinated opment:	•	Section	n on Co-ordinated development:
	O	Policy should be re- written to allow schemes where there is no reasonable potential for a co- ordinated approach or where such an approach would result in delays to		0	It is considered that Draft Policy DC A provided sufficient flexibility as it referred to 'Where such potential may reasonably exist'. This wording has been maintained in Local Plan Publication Version Policy DPM1 'Delivering well-designed, inclusive places'.

Main issues raised	How they were addressed	
deliverable sites being brought forward.		
Section on public art and cultural activity: Greater flexibility required to recognise circumstances where it is not feasible or appropriate for new development to deliver public art or other cultural	Section on public art and cultural activity: Text has been added to Local Plan Publication Version Policy DPM1 Delivering well-designed, inclusive places' which clarifies the types of development the policy will apply to. It also provides more detail on the expectations for meeting the policy, e.g. that relevant proposals should demonstrate how the provision / promotion of public art and cultural	
activity. Clarity sought on developer's role in delivering public art, e.g. would it be through financial contributions?	 Supporting text has been added to Policy DPM1 which explains that applicants are encouraged to consider ways to incorporate space; commission cultural happenings; utilise artist-led design, such as lighting, wayfinding and landscaping; and temporary or permanent artworks in the public realm. The Design and Access Statement which accompanies the planning application should be used to set out how the provision/promotion of public art and cultural activity has been addressed in the proposal. 	
 South Gloucestershire Council thought that consideration could be given to strengthening the policy's wording to better enable public art and cultural activity delivery. 	 Text has been added to Publication Version Policy DPM1 to provide more detail on the expectations for major development proposals to address public art and cultural activity provision. 	

Draft Policy DC B: Advertisements

Table 197 - main issues raised on Draft Policy DC B: Advertisements and how they were addressed in the Local Plan

Main issues raised	How they were addressed		
Assessment of cumulative impacts of advertisements in an area should be included in policy.	• It is considered that this was addressed in the first bullet point of Draft Policy DC B. This referred to unacceptable amenity impacts being caused where advertisements create or reinforce an incongruous feature in its immediate neighbourhood. Similarly, cumulative impacts would also be assessed with reference to the policy's second bullet point. This stated that unacceptable amenity impacts would be caused if advertisements result in harmful clutter of residential areas. The policy wording has been maintained for Local Plan Publication Version Policy AD1 'Advertisements'.		
 Policy should cross-refer to aims of policies NZC1, BG2 and DC A to assist in addressing potential climate change, biodiversity and design impacts of advertisements. 	This is not considered necessary or appropriate. The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 restrict local planning authority powers in respect of the control of advertisements to amenity and public safety matters only.		
Policy should place operating hours restrictions on illuminated advertisements to reduce carbon emissions.	Both Draft Policy DC B and Local Plan Publication Version Policy AD1 'Advertisements' refer to the restriction of operating hours as a means of ensuring proposals for illuminated advertisements do not have harmful impacts.		
Evidence to justify the policy questioned.	The need to exercise appropriate controls over advertisements is considered reasonable and supported by the NPPF.		
Criteria proposed to assess unacceptable impact:	Criteria proposed to assess unacceptable impact:		
 Lack of clarity of terms used: 'incongruous features', 'other nuisance'. 	 The terms used in the policy are considered appropriate and allow judgements to be made on proposals in the light of local / site circumstances. 		

Main issu	es raised	How they we	re addressed
0	Potential for adverse effects should only be referred to where advertisements are not an established feature or if an area is wholly residential in character.	0	The need to exercise appropriate controls over advertisements is considered reasonable and supported by the NPPF.
0	Policy should not refer to undue prominence on medium or long-distance views as context of proposed advert locations may mean they can be acceptable.	0	Use of 'unduly prominent' in the policy text to Draft Policy DC B allows consideration of context as an assessment will be made on the relative prominence of the proposal in its location. The policy wording has been maintained for Local Plan Publication Version Policy AD1 'Advertisements'.
0	Additional criteria suggested: - Regard to visual amenity in any area of the city Enjoyment of green space. - Potential for intrusive light.	0	- Not considered necessary to refer to 'any area of the city' as the policy will be applied citywide This is considered to be addressed in the policy wording of both Draft Policy DC B and Publication Version Policy AD1. For example, the third bullet point of Policy DC B refers to unacceptable impacts being caused from advertisements which detract from the character or setting of any feature of scenic interest This is considered to be addressed in the policy wording of both Draft Policy DC B and
			Publication Version Policy AD1. The sixth bullet point of Policy DC B refers to unacceptable impacts from advertisements which result in a negative impact upon residents' living conditions by

Main issues raised	How they were addressed
- Impacts relating to ease of movement.	reason of its illumination. - This is considered to be addressed in the policy wording of both Draft Policy DC B and Publication Version Policy AD1. For example, the second bullet point of Policy DC B refers to unacceptable impacts resulting
- Creation of well- designed, inclusive places.	from advertisements which result in harmful clutter. - This is considered to be addressed in the policy wording of both Draft Policy DC B and Publication Version Policy AD1 as the criteria seek to ensure advertisements do not have unacceptable amenity impacts. For example, the first bullet point of Policy DC B refers to unacceptable impacts resulting from advertisements which create or reinforce an incongruous feature in, or result in a negative visual impact on, its immediate neighbourhood.
Criteria proposed relating to harmful impacts on public and road safety:	Criteria proposed relating to harmful impacts on public and road safety:
 Reference to adverts obscuring 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. 	 The approach is considered appropriate and allows a judgement to be made on the proposal in the light of local / site circumstances.

Main issu	es raised	How they we	re addressed
0	Policy should reference cyclists, pedestrians and wheelchair users as well as drivers in relation to visual distractions.	0	Local Plan Publication Version Policy AD1 'Advertisements' amended to make reference to 'road users'.
0	Policy should require advertisements to limit the potential for visual distractions in relation to the interpretation of road signs.	0	This is considered to be addressed in the final bullet point of Draft Policy DC B. The policy wording has been maintained for Local Plan Publication Version Policy AD1: Advertisements.
	Additional criteria suggested, so that an advert will be considered harmful: - When it might encroach on personal privacy; and - Creates barriers in pedestrian areas.		- It is considered that this matter was adequately addressed by Draft Policy DC B policy's reference to unacceptable impacts from proposals which result in a negative impact upon residents' living conditions by reason of its siting or illumination. The policy wording has been maintained for Local Plan Publication Version Policy AD1 'Advertisements' This is considered to be addressed in the policy wording of both Draft Policy DC B and Publication Version Policy AD1. For example, the eighth bullet point of Policy DC B refers to advertisements being harmful where they create an unwelcoming sense of enclosure.
0	Clarity sought on how adverts that	0	The term 'unwelcoming sense of enclosure' is considered

Main issues raised	How they were addressed
create an 'unwelcoming sense	appropriate and allows a judgement to be made on
of enclosure' will be	proposals in the light of local /
assessed.	site circumstances.

Development locations and allocations

Land at Bath Road, Brislington

Table 198 - main issues raised on Land at Bath Road, Brislington and how they were addressed in the Local Plan

Main issues raised	How they were addressed	
Reasons for objection: lack of exceptional circumstances to justify Green Belt loss; ecological and green infrastructure significance of site; importance of site for mitigating flood risk; need to develop brownfield land before greenfield; pressure on existing amenities and services from resulting new development; increased pollution, congestion, and associated risks to road safety from new development.	Rationale for approach explained in 2022 consultation document and maintained in supporting text to Local Plan Publication Version Policy DS12 'New neighbourhood – Bath Road, Brislington'.	
 Boundary should also include land north of A4 Bath Road, including Brislington Cricket Club. 	 Boundary considered appropriate and maintained for Publication Version Policy DS12. 	
 Sport England thought that any development should provide new or enhanced sport and recreation facilities. 	 Provision of new or enhanced sport and recreation facilities will be secured where appropriate using Local Plan Publication Version policies IDC1 'Development contributions and CIL', CF1 'Provision of community facilities' and CF2 'Retention of community facilities'. 	
Environment Agency considered that detailed	It is considered that this issue can be addressed as part of the preparation of a	

Main issues raised	How they were addressed
flood modelling is likely given site's relationship to Scotland Bottom Watercourse. This will inform appropriate flood risk mitigation measures.	detailed development framework or master plan carried out in consultation with the local community and stakeholders referred to in Publication Version Policy DS12. Also covered by Publication Version Policy FR1 'Flood risk and water management'.
Bath and North East Somerset Council sought:	 Bath and North East Somerset Council comments:
 Transport assessments which would consider impacts on highway network. 	o Building on the text provided in 2022 consultation document, Publication Version Policy DS12 makes clear that development will be expected to be supported by appropriate local and strategic transport infrastructure to address the impact of the development. Additional text has also been added to Publication Version Policy DS12 requiring development to address the provision of land across the frontage on the A4 to allow for a mass transit and improved walking and cycling corridor, good permeability through the site for walking and cycling, and improved links to the local cycling network. The issue will also be addressed as part of the preparation of a detailed development framework or master plan carried out in consultation with the local community and stakeholders referred to in the Publication Version policy. Other Local Plan Publication Version Policies will also be relevant including those in the Transport chapter, for example Policy T3A 'Transport development management'.
 Clarification on relocation of Park & Ride. 	 Supporting text to Publication Version Policy DS12 explains that there is potential for Park & Ride to be relocated to land near Hicks Gate Roundabout within Bath and North

Main issues raised	How they were addressed
	East Somerset to support improved transport facilities.
 Natural England thought features of ecological value should be retained and enhanced and high quality accessible green infrastructure provided. 	Text has been added to Publication Version Policy DS12 to refer to the retention of (and incorporation of new) important trees, hedgerows and other green infrastructure.

Land west of Silbury Road, Ashton Vale

Table 199 - main issues raised on Land west of Silbury Road, Ashton Vale and how they were addressed in the Local Plan

Ma	ain issues raised	How they were addressed
•	Reasons for objection: nature conservation and green infrastructure significance of site; loss of access to land which has benefits for health and wellbeing; flood risk; lack of exceptional circumstances to justify Green Belt designation removal; increased pressure on local services; noise pollution from nearby recycling plant likely to affect new residents; potential land contamination issues; possible negative impacts on reopening of Portishead trainline.	Proposal is maintained in Local Plan Publication Version Policy DS11 'Development allocations – southwest Bristol' with rationale provided in supporting text. Policy DS11 explains that land at Ashton Vale has now received planning permission (ref. 21/03166/P) for around 500 homes ('Longmoor Village').

Land adjacent to Elsbert Drive, Bishopworth

Table 200 - main issues raised on Land adjacent to Elsbert Drive, Bishopworth and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Reasons for objection: increase in pollution and	Proposal is maintained in Local Plan Publication Version Policy DS11
congestion and associated	'Development allocations – southwest

Main issues raised	How they were addressed
risks to road safety; poor public transport connections; increased pressures on existing services and infrastructure; increase in noise pollution for existing residents; concerns about overshadowing and loss of privacy for existing residents; brownfield land development should be prioritised over greenfield; loss of valuable green space which has benefits for mental and physical health; nature conservation importance of site; loss of site important for climate change mitigation; flood risk; presence of redundant coal mines; deforestation and soil erosion; negative impact on water table; lack of exceptional circumstances to justify Green Belt release; site not large enough to accommodate significant amount of affordable housing.	Bristol' with rationale provided in supporting text.
 Prospective developer of site thought: It could support delivery of 150 dwellings. Retention and incorporation of trees, hedgerows and green infrastructure should not be an 	Prospective developer's comments: Issues raised will be addressed by the provisions of Publication Version Policy DS11. This requires development at Elsbert Drive to be in accordance with a detailed cross-boundary development framework or master plan prepared in consultation with the local community which addresses the layout and form of development, access and the relationship with surrounding areas. It also requires development to

Main issues raised	How they were addressed
absolute requirement. Biodiversity net gain requirement does not need to be included given this	address the residential amenity of existing homes on Elsbert Drive and accord with all the other relevant policies in this plan. Supporting text refers to an estimated housing capacity of 150 homes.
is mandatory in national planning policy. • Essential infrastructure requirements should be determined through planning application process.	Affordable and self-build housing provision will be sought in accordance with Publication Version policies AH1 'Affordable housing provision' and H5 'Self-build and community-led housing'.
 Affordable housing requirement should be supported by viability testing. 	
 Objection to community led/self- build housing requirement given likely site challenges. 	
North Somerset Council	North Somerset Council's comments:
thought that: o key development principles should include reference to vehicular access not being appropriate from South Bristol Link.	 It is considered that the issues raised will be addressed in the preparation of a detailed cross-boundary development framework or master plan prepared in consultation with the local community, referred to in Publication Version Policy DS11. This will address layout and form of development, access and relationship
 Affordable housing figure will need to be considered in relation to potential differing requirements in 	with surrounding areas. Other Local Plan Publication Version policies are likely to be relevant, including IDC1 'Development contributions and CIL'; BG1 'Green Infrastructure and biodiversity in new development';

Main issues raised	How they were addressed
Bristol and North Somerset. Master-planning should include compensatory improvements to environmental quality and accessibility of remaining Green Belt land.	and Policy GI A 'Open Space for Recreation'.

Yew Tree Farm

Table 201 - main issues raised on Yew Tree Farm and how they were addressed in the Local Plan $\,$

Main issues raised	How they were addressed
Prospective developer's reasons for objecting to discontinuation of Yew Tree Farm development allocation: site is not considered to be part of a working farm; ecological impacts could be mitigated and green infrastructure improvements incorporated; development would form definitive edge to settlement boundary; site in sustainable location close to local facilities.	The approach outlined in the 2022 consultation to discontinue the proposed development allocation has been maintained for the Local Plan Publication Version.

Green Belt boundary

Table 202 - main issues raised on Green Belt boundary and how they were addressed in the Local Plan $\,$

Main issues raised	How they were addressed
 Reasons for objection included: brownfield development and urban intensification should be 	The approach outlined in the 2022 consultation has been maintained for the Local Plan Publication Version.

Main issues raised	How they were addressed
prioritised over Green Belt development; lack of exceptional circumstances to justify Green Belt release; loss of green spaces that benefit human health and wellbeing, biodiversity, flood resilience and air quality.	

Changes to existing site allocations

Western Slopes

Table 203 - main issues raised on Western Slopes and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Prospective developer's reasons for objecting to discontinuation of existing site allocations BSA1108 'Land at Novers Hill, east of Hartcliffe Way and west of Novers Lane/Novers Hill' and BSA1114 'Land at Novers Hill, adjacent to industrial units':	The approach outlined in the 2022 consultation has been maintained for the Local Plan Publication Version.
o conflict with housing provision policies as would lead to a lower level of housing delivery; development would provide policy-compliant level of affordable housing; site is in sustainable location in terms of access to services and facilities; inconsistent approach taken to how the ecological role of the site has	

Main issues raised	How they were addressed
been considered against other retained allocations in Local Plan review.	

Brislington Meadows

Table 204 - main issues raised on Brislington Meadows and how they were addressed in the Local Plan

Main issues raised	How they were addressed
Landowner's reasons for objecting to discontinuation of existing site allocation BSA1201 'Land at Broomhill, Brislington': no evidence that ecological value of site has changed since allocation; allocation could help meet housing shortfall including 30% affordable housing; 10% biodiversity net gain could be achieved; site in highly sustainable location for housing development.	The approach outlined in the 2022 consultation has been maintained for the Local Plan Publication Version. Planning permission for the development of up to 260 new residential dwellings on this site was granted planning permission in April 2023 (ref. 22/01878/P).

Appendix 1 – Local Plan Consultation Database

Throughout the preparation of the Local Plan, the council notified members of the Local Plan Consultation Database about opportunities for involvement and updates on progress. The approximately 2,500 members of the database fall within the following categories:

Specific consultation bodies

These are the organisations specified in the Town and Country Planning (Local Planning) (England) Regulations 2012 which the council is required to notify and invite representations from. It includes Government agencies such as Historic England and the Environment Agency, neighbouring councils and infrastructure providers, e.g. Bristol Water.

General consultation bodies

The council also sought involvement from what the Regulations describe as 'general consultation bodies'. These include voluntary bodies, bodies which represent the interests of racial, ethnic, national, religious and disabled groups in the area, and bodies representing business in the area.

Other bodies and individuals

Engagement was also sought from residents, employees, businesses, community / interest groups, landowners, developers and all other parties who have expressed an interest in being involved in preparing the Local Plan.

Appendix 2 – Consultation methods used

Stage 1 - Local Plan Review: Consultation (2018)

Consultation methods used:

Consultation document

In February 2018 the council published the 'Bristol Local Plan Review: Consultation' document. Comments were sought for eight weeks between 19th February and 13th April 2018.

The document was made available for inspection in the city's public libraries and City Hall. Hard copies were made available free to community groups and organisations on request.

Emails and letters

Members of the Local Plan Consultation Database were notified by email and letter.

Press release

A press release was published on 19th February to raise awareness about the consultation with local news outlets and publications.

Social media

An article about the consultation document was published on the Ask Bristol Twitter and Facebook account.

Website

The consultation document was promoted on the council's website including its Newsroom and Planning Policy pages. It was also publicised on the council's Consultation and Engagement Hub ('Ask Bristol') where an online survey was provided. An article was also sent to subscribers to the council's email news alert 'Our City'.

Discussion event

A discussion event attended by approximately 60 members of the Local Plan Consultation Database was held in City Hall on $6^{\rm th}$ March 2018. As well as an introduction to the consultation, this event enabled stakeholders to ask questions and discuss the initial proposals with officers.

Meetings

Officers attended meetings of the following groups and organisations to present information about the consultation document and answer questions:

- 14th March St Paul's Planning Group
- 20th March Avonmouth Planning and Liaison Group

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- 21st March Bristol CCI Planning and Transport Group
- 22nd March Lockleaze Residents Planning Group
- 28th March Bristol Green Capital
- 29th March Ambition Lawrence Weston
- 9th April Hartcliffe, Withywood and Bishopsworth Pride of Place Group
- 9th April Hotwells and Cliftonwood Community Association
- 18th April Knowle West Planning Group
- 28th April Bristol Parks Forum

Drop-in exhibition / event

A drop-in exhibition / event was held in Bristol Central Library on 12^{th} March between 2-6.30pm to enable the public to discuss the initial proposals with council officers.

Stage 2 – Local Plan Review: Draft Policies and Development Allocations – Consultation (2019)

Consultation methods used:

Consultation documents

In March 2019 the council published the 'Bristol Local Plan Review: Draft Policies and Development Allocations – Consultation' document. Comments were sought for nine weeks between 18th March and 17th May 2019.

The documents were made available for inspection in the city's public libraries and City Hall and placed on the council's website, along with a questionnaire. Hard copies were made available free to community groups and organisations on request.

Emails and letters

Members of the Local Plan Consultation Database were notified by email and letter.

Press release and launch

A press release was published to raise awareness about the consultation and articles were included in a number of local news outlets and publications including the Bristol Post (27th March, 12th April, 16th and 22nd May) and South Bristol Voice (April).

The Mayor of Bristol also attended a press launch for the consultation held at the Hub, Gainsborough Square, Lockleaze on 18th March.

Social media

An article about the consultation document was published on the Ask Bristol Twitter feed.

Website

The consultation document was promoted on the council's website including its Newsroom and Planning Policy pages. It was also publicised on the council's Consultation and Engagement Hub ('Ask Bristol') where an online questionnaire was provided. An article was also sent to subscribers to the council's email news alert 'Our City'.

Drop-in exhibitions / events

Four drop-in exhibitions / events were held to enable local people to discuss the draft policies and proposals with council officers.

- 23rd April Greenway Centre, Southmead BS10 5PY, 2.30-6.30pm
- 25th April @symes Community Building, Hartcliffe BS13 0BE, 2.30-6.30pm
- 30th April Central Library, Bristol BS1 5TL, 12-6.30pm
- 9th May Central Library, Bristol BS1 5TL, 2.30-6.30pm

Meetings

Officers attended meetings of the following groups and organisations to present information about the consultation document and answer questions:

- 21st March Bristol Homes and Communities Board
- 9th April Bristol Neighbourhood Planning Network
- 11th April Thriving South Bristol
- 15th April Western Harbour stakeholder group
- 30th April St Philip's Marsh planning groups
- 1st May Bristol Civic Society
- 1st May Lawrence Hill planning groups
- 2nd May Parks Forum
- 7th May Business West Planning and Transport Group
- 9th May Bishopsworth planning groups
- 13th May Bristol Property Agents Association
- 15th May Knowle West Future
- 16th May Greater Brislington Together
- 20th May Hartcliffe and Withywood Community Partnership
- 20th May Homes West
- 22nd May St Paul's Planning Group
- 10th June Bristol Disability Equality Forum

Stage 3 – Local Plan Review: Draft Policies and Development Allocations – Further consultation (2022)

Consultation methods used:

Consultation document

In November 2022 the council published the 'Bristol Local Plan Review: Draft Policies and Development Allocations – Further consultation' document. Comments were sought for seven weeks between 28th November 2022 and 20th January 2023.

The document was made available for inspection in the city's public libraries and City Hall and placed on the council's website, along with a questionnaire. Hard copies were made available free to community groups and organisations on request.

Emails and letters

Members of the Local Plan Consultation Database were notified by email and letter.

Press release and launch

A press release was published on 30th November to raise awareness about the consultation. Articles were included in a number of local news outlets and publications including the Bristol Post (5th December).

Social media

An article about the consultation document was published on the Ask Bristol Twitter feed.

Website

The consultation document was promoted on the council's website including its Newsroom and Planning Policy pages. It was also publicised on the council's Consultation and Engagement Hub ('Ask Bristol') where an online questionnaire was provided.

Meetings

Officers attended meetings of the following groups and organisations to present information about the consultation document and answer questions:

- 25th October Bristol Neighbourhood Planning Network
- 30th November One City Environment Board
- 30th November Bristol Green Capital Partnership Sustainable planning group
- 12th December Bristol Advisory Committee on Climate Change
- 15th December Bristol Civic Society
- 5th January South Bristol planning groups

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- 11th January St Philips Marsh and Old Market planning groups
- 12th January Bishopston, Redland, Cotham Community Partnership
- 12th January Bristol Advisory Committee on Climate Change
- 17th January Easton planning groups
- 23rd February Bristol Property Agents Association