



Bristol Local Plan

Submission stage

Regulation 22

Catalogue of representations received on issues not related to specific local plan policies

June 2024



Introduction

This document is a catalogue of the representations received as part of the Regulation 19 consultation on the Bristol Local Plan Publication Version 2023. Following approval of the plan by Full Council on 31 October 2023, a representation period was carried out between 21 November 2023 and 26 January 2024. A total of 1,634 representations were made by 436 respondents during the representation period.

All representations relating to general issues and those which have not been categorised under a specific local plan policy or proposal title have been processed into a standardised format as shown below, with links to any additional documents provided. The full representations as received have been published on the Bristol City Council [website](#). An index of representors included within this document is provided below.

A summary of the main issues raised in the representations is available [here](#).

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General comments by chapter – Section 1: Objections and proposed modifications

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345	Kevin Chidgey	Section 1	-	-	-	-	-	<p>Abandonment of the sub – regional Spatial Strategy</p> <p>Paragraph 1.4 states that “ the sub regional Spatial Development Strategy is not being progressed and so the strategic planning context for Bristol’s local plan will be established through each council’s own local plan, informed by a process of co-operation”.</p> <p>So, in this short statement the City Council announces the abandonment of a much needed integrated strategic sub regional approach in favour of a going it alone. This is the antithesis of good planning. For over sixty years - going right back to the introduction of the Bristol and Bath Green Belt in the late 1950s - there has always been a generally accepted recognition by all political persuasions of the critical need for a strategic approach to the planning of the wider Bristol and Bath sub region – an area approximating to both the Bristol and Bath employment and housing market areas. Why this integrated strategic approach is now being abandoned is unclear. It would appear that local politics and the unwillingness or inability for authorities to work together for the greater good have won the day.</p> <p>The abolition of Avon County Council in 1996 left a huge hole when it came to strategic planning and transportation. I would have hoped that almost 30 years on and after many half-hearted attempts at sub-regional planning it would have been crystal clear that a properly co-ordinated, sub regional approach is essential. Do Council decision makers really believe that the long term housing and employment needs of our area and the provision of strategic transportation and service infrastructure can be coordinated and delivered through four separate plans approved by four different planning authorities with their own timetables, political (and short term) agendas and ways of working. The strategic role of WECA is also compromised as the Authority does not cover North Somerset.</p>	-	-

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								<p>Statement(s) of common ground with adjoining authorities</p> <p>Regretfully the National Planning Framework (NPF) does not require planning authorities to prepare a formal sub - regional spatial strategy but paragraph 27 of the NPF does require that “In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency”.</p> <p>There is reference in the Local Plan to joint working but no mention of any statement(s) of common ground as required by NPF. Have the four local authorities comprising the West of England agreed and made available a statement(s) of common ground ? if so where can it be found? If not, why not and what is the timetable for producing and making available the statement(s)?</p>		

General comments by chapter – Section 2: Vision: Building a better Bristol – Objections and proposed modifications

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98	Anna Tucker	Section 2 Vision: Building a better Bristol	2.4	-	-	-	-	3.4 Vision I am concerned about the Rapid transit network proposals. I don't agree with plans for building an underground in Bristol.	-	-
103	June Goulding	Section 2 Vision: Building a better Bristol	2.4	-	-	-	-	3.4 Vision I am concerned about the Rapid transit network proposals. I don't agree with plans for building an underground in Bristol because when a feasibility study was undertaken, it showed that the cost of building such a scheme (if possible) would be too high. Further studies would cost billions, and the money would be better spent in improving existing transport methods. The council should also accept that public transport will never be sufficient to meet the demands of a city population. People will always need personal vehicles, and removing parking spaces and trying to pretend new developments will be 'car free occupants' only adds to an unpleasant living experience and stresses communities.	-	-
104	Holly Tipping	Section 2 Vision: Building a better Bristol	2.4	-	-	-	-	3.4 Vision I am concerned about the Rapid transit network proposals. I don't agree with plans for building an underground in Bristol.	-	-
105	Tim Marriner	Section 2 Vision: Building a better Bristol	2.4	Unsure	-	-	-	3.4 Vision I am concerned about the Rapid transit network proposals. I don't agree with plans for building an underground in Bristol because, owing to the old coal workings scattered under the city (and generally not mapped accurately), this would slow down work and escalate costs.	-	-
107	Jasmine Beard	Section 2 Vision: Building a better Bristol	-	-	-	-	-	A future Bristol: We should practice a commitment to reduced car use, transforming the urban landscape into pedestrian-friendly havens. Picture a city where each green space, each habitat, is not just preserved but nurtured and celebrated – a sanctuary for wildlife and a source of collective pride for every resident. Harmony between the concrete jungle and the lush embrace of nature. Affordable and sustainable housing becomes more than a promise; it becomes a reality, a cornerstone of an inclusive city that values every resident, regardless of their socio-economic status. This future Bristol is a beacon of environmental consciousness, where renewable energy sources power our homes and innovation paves the way for a carbon-neutral metropolis. It's a city that champions	-	-

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								<p>sustainable practices, from locally sourced goods to eco-friendly transportation, fostering a culture that reveres the earth we call home.</p> <p>Let us unite in our passionate pursuit of this vision, where Bristol becomes a shining example of a city that not only grows but flourishes in harmony with nature, valuing the well-being of its residents, the preservation of its green spaces, and the accessibility of affordable and sustainable housing. The future of Bristol is a future of balance, resilience, and shared prosperity – a future we must strive for with unwavering dedication and impassioned determination.</p>		
110	Fran Whitlock	Section 2 Vision: Building a better Bristol	-	No	-	-	-	My perfect Vision of Bristol would include real powers by elected councillors to hold planning officers to account, to force developers to build to conditions and the affordable quota agreed in the granted Planning permissions.	-	-
111	Thomas Lewis	Section 2 Vision: Building a better Bristol	-	-	-	-	-	<p>3.4 Vision</p> <p>I am concerned about the Rapid transit network proposals. I don't agree with plans for building an underground in Bristol because I don't think the years of building it would require to build one would be useful, the stress and discomfort you would be forcing citizens to endure would not be worth it. I think an overhead transport system would be better like a monorail or gondolas as we are such a hilly city.</p> <p>My perfect Vision of Bristol would include wildspaces for animals spread throughout the city, which will also help people's attitudes and clean the environment up around them more.</p>	-	-
113	Julia Halpenny	Section 2 Vision: Building a better Bristol	-	No	-	-	-	My perfect Vision of Bristol would include less student accommodation - to encourage more local potential students to apply to study at Bristol. I would like to see more affordable Continental/Canadian style town houses built to high ecological and building standards. Also parks free from litter and dog mess where everyone feels safe. Not everyone can cycle or walk long distances, so a good public transport network would be essential	-	-
124	Sue Chubb	Section 2 Vision: Building a better Bristol	-	No	-	-	-	<p>3.4 Vision</p> <p>I am concerned about the Rapid transit network proposal and how much damage it would do to nature if it were built.</p> <p>My vision for Bristol is for it to be a thriving carbon neutral city with green spaces for all, high quality housing, our green spaces permanently protected and enhanced, more tree cover, good air quality, clean rivers, more local food production, new nature sites, the</p>	-	-

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								restoration and establishment of new biodiverse habitats for wildlife, high quality public facilities and services, protection for social care and libraries and other public services that benefit all, especially our children.		
126	John Knight	Section 2 Vision: Building a better Bristol	Paragraph 2.7	-	-	-	-	-	Paragraph 2.7 The "...goal of a 15-minute city" is in line with item 11 of the UN Global Goals; however the Department of Transport Policy paper The plan for drivers [1] will consult about restrictions on the availability of DVLA data to local authorities. It is not clear that Government policy will support 15-minute-cities, therefore consider deleting the term from the Local Plan. 1 https://assets.publishing.service.gov.uk/media/651fe3022548ca000dddee82/the-plan-for-drivers.pdf	-
153	Catherine Withers	Section 2 Vision: Building a better Bristol	-	-	-	-	-	3.4 Vision I am concerned about the Rapid transit network proposals. I don't agree with plans for building an underground in Bristol because the carbon emissions and costs would appear to be astronomical My perfect Vision of Bristol would include real powers by elected councillors to hold planning officers to account, to force developers to build to conditions and the affordable quota agreed in the granted Planning permissions.	-	-
154	Bridget Bennett	Section 2 Vision: Building a better Bristol	-	-	-	-	-	3.4 Vision I am concerned about the Rapid transit network proposals. I don't agree with plans for building an underground in Bristol because	-	-
156	Hilary Rydon	Section 2 Vision: Building a better Bristol	-	-	-	-	-	3.4 Vision I am concerned about the Rapid transit network proposals. I don't agree with plans for building an underground in Bristol because it is unrealistic and too expensive. Bristol needs a good bus service to cover and connect the city and to provide cheap and accessible transport for everyone.	-	-
174	Windmill Hill and Malago Planning Group	Section 2 Vision: Building a better Bristol	Paragraph 2.4	No	Positively prepared	Unsure	Unsure	Whilst the idea of improved mass transit across the city is support, the group feels that: • It should not include a below ground transport network disruption, indeed it should not mandate that methods of transit should be	Whilst the idea of improved mass transit across the city is support, the group feels that: • It should not include a below ground transport network disruption, indeed it should not mandate that methods of	-

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								specifically mandated, this is a weakness should more effective, cheaper, efficient or lower carbon means of transport become available. <ul style="list-style-type: none"> • It should include investment where possible into existing infrastructure, such as local rail. • It should avoid compulsory purchase of residential properties. 	transit should be specifically mandated, this is a weakness should more effective, cheaper, efficient or lower carbon means of transport become available. <ul style="list-style-type: none"> • It should include investment where possible into existing infrastructure, such as local rail. • It should avoid compulsory purchase of residential properties. 	
189	Elizabeth Blackwell Properties Ltd	Section 2 Vision: Building a better Bristol	See comment	No	Positively prepared	No	No	<p>2.1. The key failing of the proposed plan is the Council's clear failure to seek to address the city and wider county's housing emergency, in clear prioritisation of other considerations over meeting the housing needs of its citizens.</p> <p>2.2. This is a principle acknowledged previously by the Mayor in his comments in answer to a question on the balance of considerations on future plans in the Member Forum of 12th January 2020 (Question CON. 05 from Cllr Kevin Quarterly – Appendix 2): "The ecological emergency and the environmental emergency sit alongside the housing emergency and jobs and economic emergency. It just shows how complicated it is running a city. We have to take an integrated approach to them all and deliver on all at the same time...."</p> <p>2.3. While the foreword sets out the scale of the challenge as it pertains to the housing emergency, the Local Plan subsequently presented fails to engage with this challenge in what should be a touchstone throughout the plan. Accordingly, the plan's approach, by failing to meet housing needs and failing to address the housing crisis, is misinterpreting the principles of sustainable development.</p> <p>2.4. The NPPF sets out that at the heart of national policy is a presumption in favour of sustainable development at paragraph 10, with paragraph 9 setting out that these objectives should be delivered through the preparation and implementation of plans. Paragraph 16 sets out the need for plans to be prepared with the objective of contributing to the achievement of sustainable development, with this role set out in statute by s.39 of The Planning and Compulsory Purchase Act 2004. Achieving sustainable development means that the planning system has three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways (NPPF Paragraph 8).</p> <p>2.5. Paragraph 11 of the NPPF sets out that all plans should promote sustainable development that seeks to meet the needs of their area, align growth and infrastructure, improve the environment and mitigate climate change.</p> <p>2.6. Bristol is at the heart of the West of England region, having long been recognised both by the West of England Combined Authority</p>	See above	https://file.s.smartsurvey.io/a/K2VE8Y4Y/P19-2214BristolLocalPlanReviewReg19Reps23.01.24.pdf

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								<p>and Bristol City Council as the driver of the regional economy and accordingly the key population centre.</p> <p>2.7. This role is also reflected in the Standard Method 'uplift' to the largest urban centres, due to their role in maximising existing infrastructure; reflecting a profound structural change in the retail and commercial sector presenting opportunities for creative use of land in urban areas; and meeting the Government's climate aspirations to aim for a spatial pattern of development that reduces the need for unnecessary high-carbon travel (Government response to the local housing need proposals in "Changes to the current planning system" - Updated 1 April 2021) with paragraph 60 of the NPPF setting out the Government objective to significantly boost housing supply.</p> <p>2.8. If the City's housing needs are not met, this will give rise to clear harms to the objectives of sustainable development:</p> <ul style="list-style-type: none"> • Social impacts – including the availability and cost of housing, with consequent impacts on housing waiting lists, housing insecurity, overcrowding and homelessness; • Economic impacts – including access to and retention of employees for the local economy, reduced disposable incomes due to increased housing costs, as well as reduced output of the development sector; and • Environmental costs – including people having to live further away from their place of work, and other community facilities and services, increasing their carbon footprint and contributing to pressures on the climate; pushing the need for development out into more rural locations where higher density, more efficient forms of development are less deliverable, resulting in greater land take. <p>2.9. The Council in failing to engage with its housing needs places a clear prioritisation of some elements of sustainable development over others and it is considered that this is in clear conflict with the NPPF. Paragraph 119 of the NPPF sets out that planning policies should promote an effective use of land, stating: "Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land".</p> <p>2.10. Moreover, Paragraph 11 of the NPPF also sets out that strategic policies should, as a minimum, provide for objectively assessed needs for housing, with two exceptions: where national policy that protects areas or assets of particular importance provides a strong reason for</p>		

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								<p>restricting development in the plan area; or where the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.</p> <p>Vision</p> <p>2.11. The overarching Vision for Bristol is set out at Paragraph 3.4 of the document, which is supported, and states: “The vision for Bristol is of a diverse and inclusive city where inequality and deprivation have been substantially narrowed. The delivery of new and affordable homes through urban living will enable housing needs to be met...”</p> <p>2.12. Part of the Vision for Bristol City is to deliver 2,000 homes a year by 2025 across the city with a focus on affordable housing - i.e. council housing, housing association homes and other forms of tenure. By 2030 a further 20,000 homes including affordable homes will have been built since 2020, which will require delivery at 2,000 homes per year from 2020-2030, despite the plan period starting in 2022 (8 years to 2030) and published completions of 1,589 homes in 2020/2021, 2,563 in 2021/2022 (Bristol AMR 2022) and 1,562 in 2022/2023 (Live Table 122: Net Additional dwellings by Local Authority District England 2001-02 to 2022-23 published by the Department for Levelling Up, Housing and Communities) meaning an average delivery of 2,041 homes per year is necessary. By 2040 a total of 34,650 homes will have been built over the plan period, which equates to 1,946 homes per year over the remaining 17 years of the 18 year plan period (April 2022-March 2040).</p> <p>2.13. The plans position on housing delivery is therefore inconsistent throughout its Vision, and ignorant of Council delivery which is replicated in its Objectives (see below).</p> <p>2.14. The attached housing target set within the Vision is not only woefully unambitious, but predicated on the Council’s own assessment of housing need, which is considered unsound, and this is addressed further below in reference to the defined housing need Policy H1.</p> <p>2.15. This approach imbeds a failure to meet the Council’s stated vision for the city at plan inception and represents a fundamental failure of the plan as drafted to meet both its own vision and the obligations upon the Council to address the presumption in favour of sustainable development. The approach to delivering even the Council’s own assessment of housing need without a suitable change to ensure the delivery of sufficient homes is simply unachievable.</p> <p>2.16. The record for housing delivery in Bristol has regularly been well below the up-to-date defined housing need, indicating a need to allocate further sites to deliver the City’s housing needs and explore all</p>		

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								<p>avenues for housing delivery. The AMR 2022 indicates that since 2009/10 the Council has achieved 2,000+ dwellings only in the last published year, with national Government data (in the absence of an up-to-date 2023 AMR) indicating a return to usual delivery rates for the Council. Since 2010/11 net additional dwellings have in all other years been well below 2,000 dwellings per annum, with an average of only 1,678 dwellings per annum over the past 10 years.</p> <p>2.17. This also results in significant impacts on affordable housing delivery, with the last published 2022 AMR setting out that an average affordable delivery over the past 10 years of 248 affordable homes per annum, compared with a commitment to deliver 800 affordable homes per annum over the period 2017-2020 (Bristol City Housing Delivery Plan 2017).</p> <p>2.18. While recent returns for 2021-2022 indicate a substantial uplift in housing delivery, it is notable that this appears most likely a reflection of delayed delivery from years 2019/2020 and 2020/2021 due to the Covid 19 pandemic given the subsequent return to a below average annual number of 1,562 in year 2022/2023 under Government data as set out above.</p> <p>2.19. It is crucial that to deliver the stated vision that the Local Plan Review is sufficiently ambitious in both its targets and allocations to meet the city's housing needs, and as is set out further below, this is not considered to presently be the case requiring a step change in commitment to housing delivery.</p> <p>Objectives</p> <p>2.20. The objectives under paragraph 2.6 refer to "enabling delivery of at least 1,925 homes a year in Bristol up to 2040".</p> <p>2.21. No total housing requirement is set within the objectives, but this equates to 34,650 homes over the 18-year plan period starting in 2022 as set out by 2040 within the preceding Vision.</p> <p>2.22. This however does not equate to 20,000 homes by 2030 under the stated vision, at 15,037 where accounting for delivery in year 2022/2023 as set out above.</p> <p>2.23. Likewise, this falls 363 homes short of the 34,650 home 2040 vision where accounting for delivery in year 2022/2023.</p> <p>2.24. The objectives also set an objective of "Setting out an approach to inclusive and sustainable growth and development, addressing the needs of everyone in all parts of the city" with a further objective to aim to "exceed the housing target where new infrastructure can unlock potential"</p> <p>2.25. Given the Council are explicitly failing to meet their own defined housing need let alone the Government Standard Method defined housing need, the plan clearly fails this aim/objective. The supporting</p>		

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								<p>Infrastructure Delivery Plan (September 2023) provides very little clarification of infrastructure needs and how these will be delivered to support delivery of the Council's vision, aims and objectives.</p> <p>Aims</p> <p>2.26. As set out above and below it is unclear how a number of the listed aims at paragraph 2.7 will be achieved by an intentional significant under-delivery of housing against the City's housing need and the withdrawal of allocations at Novers Hill. These include the following references:</p> <ul style="list-style-type: none"> • "...significantly increasing the number of new and affordable homes" • "Actively respond to the climate and ecological emergencies whilst securing sustainable development" • "Enable the sustainable growth of our economy for everyone" • "Take a plan-led approach to promoting areas with the potential to increase densities and make efficient use of under-used land" • "Allocate new sites for housing and mixed-use development and highlight sites with potential for housing development and ensure that the best use is made of existing development allocations" • "Encourage innovation in the design, construction, and location of diverse housing solutions" • "Manage the development of student housing to safeguard existing communities whilst supporting thriving universities by meeting student accommodation needs" <p>2.27. The draft plan then lists the aims at 2.7 as 'aim/objective' in reference to the drafted chapters/policies of the plan and the United Nations Sustainable Development Goals through pages 7-10 of the draft plan.</p> <p>2.28. As set out above, it is unclear how the Council can reasonably assert meeting the needs of today's and tomorrow's communities where purposefully significantly under-delivering housing.</p>		
278	Crest Nicholson Partnerships and Strategic Land	Section 2 Vision: Building a better Bristol	Pages 6 and 7	No	Effective	Yes	Yes	<p>Aims and Objectives</p> <p>2.4 The Vision for the plan is followed on pages 6 and 7 by a comprehensive set of Aims and Objectives. These set out more tangible indicators and statements of intent regarding the Council's intentions for the Local Plan.</p> <p>2.5 We support the Aims and Objectives set out in the Local Plan paragraphs 2.6 and 2.7. In particular, we support paragraph 2.6 bullet point 2 which commits to enabling the delivery of 1,925 new homes in Bristol a year up to 2040, and we support paragraph 2.6 bullet point 3 which commits to making efforts to exceed housing targets where new infrastructure can unlock additional capacity.</p> <p>2.6 However, given the requirement for the Local Plan to also have</p>	<p>We would therefore suggest that the following is added as a bullet point to paragraph 2.6:</p> <p>"Working with our West of England partner authorities in Bath and North East Somerset and South Gloucestershire, and our neighbouring authority in North Somerset to ensure that needs are met over the wider area, and that Bristol's unmet housing need can be accommodated."</p>	-

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								regard to creating a coherent spatial strategy for the wider West of England sub-region, and more particularly for the West of England Combined Authority (WECA), we consider that it would also be useful to set out an aim to ensure that the needs of the wider area, and particularly the housing need as it applies to Bristol, are met.		
303	David Gray	Section 2 Vision: Building a better Bristol	Paragraph 2.6, page 6	No	Positively prepared	-	No	<p>Positively Prepared: The strategic priorities say nothing about how the Council plans to exercise its Duty to Cooperate, in particular how strategic cross border planning issues will be coordinated with neighbouring authorities. The inclusion of such a strategic priority will promote the soundness of the Plan by making more visible the Council's commitment to mutual action with adjacent councils on strategic cross border issues.</p> <p>Duty to cooperate: Nowhere in the plan is there a mention of the Duty to Cooperate, other than in the foreword. For the avoidance of doubt and to clarify its intentions, the Council's commitment to that duty should be apparent in the Plan's Aims and Objectives, its Development Strategy and, where appropriate, in its policies.</p>	An additional Objective in paragraph 2.6: "Support the Council's Duty to Cooperate by including in the policies, criteria that promote agreements in Statements of Common Ground"	https://files.smartsurvey.io/3/1/CGR52XMC/236364279_20966068_3223269.pdf
303	David Gray	Section 2 Vision: Building a better Bristol	Paragraph 2.7 on page 6	No	Effective	-	No	<p>The attached "Commuting: Why no strategy" suggests that a strategy is required to reduce commuting. Strategy lies below Aims and Objectives and above policies so, in local plans they do not explicitly appear but could be expressed in the supporting documents and Statements of Common Ground. In a local plan a strategy would be implemented via the various policies that are relevant to it. Of my 11 responses to the plan, the following 10 (which see) discuss how a strategy to reduce commuting miles may appear in policies and their justification paragraphs:</p> <ul style="list-style-type: none"> • Aims and objectives para 2.6 • Aims and objectives para 2.7 • Policy UL1: Effective and efficient use of land • Housing para 6.1 & 6.6 • Housing para 6.7 & 6.8 • Policy E2: Economic development land strategy • Transport chapter justification paragraph 10.4 • Net zero: Additional policy proposed • Policy HW2: Air quality • Policy HW2B: Health and development page 207 <p>Effective: There is an urgent need to reduce carbon emissions from all sources. Reducing carbon emissions from the high levels of commuting in Bristol and from its neighbouring Councils is described the attachment. The attachment also promotes the reduction of</p>	An additional Aim in paragraph 2.7: "Reduce total commuting mileage as a means of reducing: carbon emissions; pressure on highways infrastructure; the need for (costs of) new highways infrastructure; road maintenance costs and air pollution and increasing active travel and public transport use"	https://files.smartsurvey.io/3/1/CGR52XMC/236364279_20966068_3223269.pdf

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								<p>commuting because it supports a surprising number of the aims, objectives and policies of the plan. An additional aim for the plan is proposed below to emphasize that an increased focus on commuting reduction would increase the effectiveness of so many policies in the plan.</p> <p>Duty to cooperate: Half of those who commute to work in Bristol drive into Bristol from elsewhere. Most of Bristol's air pollution is caused during rush hours by commuting traffic. The attachment, "Commuting: Why no Strategy", includes consideration of commuting from the adjacent Council areas. Nowhere in the plan is there an aim, objective or policy to address the extent to which poor health in the city is caused by air pollution from cross border car commuting. Nor is there any acknowledgement that this cross border issue should be tackled via Statements of Common Ground under the Council's Duty to Cooperate. The additional aim for the plan, proposed below would strengthen the health benefits of the plan by reducing the amount of rush hour traffic that causes pollution in addition to the increasing the effectiveness of so many policies in the plan.</p>		
368	Nightwatch	Section 2 Vision: Building a better Bristol	p.5	-	-	-	-	<p>Building a Better Bristol</p> <p>One of the main foundations for the Local Plan's "Vision of Building a better Bristol" is the One City Plan and its aim to include everyone to build on the economic success of the city, when referring to the aforementioned One City Plan there was little positive preparation of this plan for the Night Time Economy (£95 Billion per annum for the economy NTIA) as during its creation events did not have trade representatives in attendance at any stage thus making the One City Plan a foundation for effective and consistent planning for balanced, sustainable and livable communities questionable.</p> <p>2.7 "Secure diverse and vibrant centres across the city which help to deliver the goal of a 15-minute city" „ Protect our valued open spaces, promote food growing and increase the tree canopy to support a liveable, healthy city; „ Cherish the city's historic environment and harness the benefits of heritage sensitive regeneration; these aspiration has been called into question in recent months as the housing dominant focus of the planning strategy has been more and more night time economy and community facilities under threat or developed into housing thus losing vital venues " the Rhubarb Tavern" case is a prime example all policies and community and committee views pointed to protect this Pub with its Garden yet the planning</p>	-	<p>https://files.smartsurvey.io/3/1/RTEME22Q/236597962_20966066_3170979.pdf</p> <p>https://files.smartsurvey.io/3/1/VXT27FQI/236597962_20966066_3270071.pdf</p>

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								departments focus on homes above all else created inconsistency of approach. The outcome if it goes in line with the planning department's view would be loss of the only Pub in the whole area undoing the 15 minute livable neighborhood.		
369	REDROW HOMES Ltd	Section 2 Vision: Building a better Bristol	Para 2.6 – 2.10, page 6	No	Positively prepared, justified, effective, consistent with national policy.	Yes	No	<p>Plan is not positively prepared, justified, effective or consistent with national policy.</p> <p>Aims and Objectives Under the 4 objectives the new local plan sets out an approach to “inclusive and sustainable growth and development, addressing the needs of everyone in all parts of the city.” (my emphasis). The second objective is to enable the delivery of at least 1,925 new homes a year in Bristol up to 2040, including affordable housing and homes to meet a range of needs. Thirdly to exceed the housing target where new infrastructure can unlock potential, and Tacking climate change and ecological emergencies... However, the Council have not undertaken an unconstrained assessment of the number of homes needed in the area. As set out in the PPG “Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.” Paragraph: 001 Reference ID: 2a-001-20190220 Revision date: 20 02 2019 The NPPF expects strategic policy making authorities to follow the standard method for assessing local housing need. The needs of the city as determined by the Standard Method for housing are 3,380 per annum. Clearly, in providing for only 1,925 dwellings per annum the city is failing to meet the needs of everyone in all parts of the city. Furthermore, the need for affordable housing is much harder to achieve on brownfield sites due to other obligations. The objectives indicate a lower figure of 1,925 homes per annum in the period up to 2040 which is included as an annual average minimum to be delivered by 2040. The plan period in paragraph 6.9 on page 68 is from 1st April 2022 to 31st March 2040 i.e., 18 years. However, it is not clear what the total housing requirement is as no figure is included in Policy H1. The objective also states that homes will be provided to meet a range of needs and that the aim is to exceed the housing target where new infrastructure can unlock potential. If the focus is on brownfield sites it</p>	The Plan should be modified so that housing needs are met. (see our objections to Policy H1). A range and choice of sites needs to be provided in accordance with the NPPF. The Council has not provided the evidence to justify its approach in failing to meet housing needs, particularly when previously proposed allocations at the Reg 18 Plan in March 2019 have been excluded.	https://file.s.smartsurvey.io/3/1/GOYSLLY3/236610038_20966066_3291418.pdf https://file.s.smartsurvey.io/a/3L32ZV7S/Appendix%201%20Bristol%20Housing%20Needed%20-%20Redrow%20Homes%20Jan24%20-%2019.01.2024.pdf

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								<p>is not clear how a range of needs will be met, whether the sites are viable and what infrastructure will be delivered. Furthermore, there is a concern that some of these brownfield sites may not be suitable for residential use and are more appropriate to be retained for employment use. It should be recognised that there needs to be a combination of sites and that brownfield sites alone cannot sustain the level of growth required or deliver the levels of affordable housing needed.</p> <p>It is not clear how the aims will be met, for example, “significantly increasing the number of new and affordable homes”, particularly when the overall housing requirement is below the Standard Method. Furthermore, it is not clear how promoting areas with the potential to increase densities and make efficient use of under-used land will achieve the significant boost to housing supply or is consistent with paragraph 60 of the NPPF (Sept 2023), when all these factors are considered e.g. taking into account the need for different types of housing, the availability of land suitable for accommodating it, local market conditions, viability, the availability and capacity of infrastructure and services and the desirability of maintaining the areas prevailing character and setting and the importance of securing well-designed, attractive and healthy places. The issues of high density and lack of green space in the city were all too apparent during COVID. At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11). All plans should promote sustainable development that seeks to meet the needs of their area, align growth and infrastructure, improve the environment and mitigate climate change.</p> <p>The National Planning Policy Framework emphasises that responding to climate change is central to the economic, social and environmental dimensions of sustainable development.</p> <p>Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways, i.e., no one objective outweighs the other.</p> <p>Whilst the Council declared a climate emergency in 2018 and in 2020 made a commitment declaring that the city would become carbon neutral and climate resilient by 2030, this is supported, but the way this is achieved is questioned. By failing to meet housing needs and failing to address the housing crisis, the strategy is misinterpreting the principles of sustainable development. Bristol is at the heart of the west of England, this has long been recognised through numerous planning documents.</p> <p>“Bristol has created one of the most vibrant and successful economies</p>		

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								<p>in the UK. Nationally, among the Core Cities, Bristol has experienced sustained growth in both population and economic scale and has the highest productivity levels per capita, employment and qualification rates of the major cities. Within the West of England, Bristol is the primary economic centre with nearly half of all the jobs (44.8%) and enterprises (40.1%). But more than this, it is a creative and educational powerhouse with a vital, diverse and proudly Bristolian population.” Bristol One City – Economic Recovery and Renewal Strategy 2020</p> <p>By failing to meet housing needs where they arise, by failing to consider a comprehensive review of the Green Belt this will create more pressure on the existing stock, worsen affordability, result in an increase in commuting over a longer distance, which will not assist with the carbon neutral goals and climate change agenda that the Council have outlined. When people are unable to access suitable housing it can result in overcrowding, more young people living with their parents for longer, impaired labour mobility, which makes it harder for businesses to recruit staff, and increased levels of homelessness occurs.</p>		
369	REDROW HOMES Ltd	Section 2 Vision: Building a better Bristol	Section 2 Vision: Building a better Bristol – para 2.1 – 2.4	No	Positively prepared, justified, effective, consistent with national policy.	Yes	No	<p>Plan is not positively prepared, justified, effective or consistent with national policy.</p> <p>The Vision states that the Council is committed to building a better Bristol, a city of hope and aspiration where everyone shares in its success. Para 2.1 states: “Working with our partners through the One city Plan, we aim to include everyone as we continue to build the economic, social and environmental well being of the city.”</p> <p>Para 2.2 states: “The new local plan will help deliver the new homes and workspace we need and safeguard the environmental assets we value.”</p> <p>The Vision states that by 2025 the new local plan will be in place and 2,000 homes a year will be being built across the city with a focus on affordable homes and other forms of tenure which put homes in reach of people who can’t access market housing. By 2040 at least 34,650 new homes will have been completed since the plan period commenced.</p> <p>However, the Standard Method which is the method the NPPF expects strategic policy making authorities to follow in terms of assessing housing need indicates that 3,380 homes per annum are required and over the plan period i.e. 18 years to 2040 this is at least 60,840 dwellings.</p> <p>The Plan will only deliver 57% of the housing needed in the plan</p>	<p>The Vision should address the housing crisis in Bristol and every effort should be made to deliver housing to meet its needs. This should be demonstrated in a transparent way – e.g. housing trajectory provided with the Plan and an analysis of all proposed sites in the SHLAA.</p> <p>Through our analysis of the evidence, we have demonstrated why due to issues such as affordability, economic growth potential, students and infrastructure, that the Council should use the full LHN calculation (3,380dpa) as the identified minimum housing need.</p>	<p>https://files.smartsurvey.io/3/1/G0YSLLY3/236610038_20966066_3291418.pdf</p> <p>https://files.smartsurvey.io/a/3L32ZV7S/Appendix%201%20Bristol%20Housing%20Needed%20-%20Redrow%20Homes%20Jan24%20-</p>

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								<p>period, this will have significant consequences for residents to Bristol – making it much harder to find a home whether market housing or affordable housing. The immediate and obvious corollary of building less housing is that less affordable housing is also delivered at a time of greatest need as the SA acknowledges “Bristol has a growing population, above that of the national average, which is leading to high demand for new housing however there is limited housing supply.</p> <ul style="list-style-type: none"> • Access to the property market has become unattainable for many due to worsening affordability. • The impact of increasing population densities has been most acutely felt within the central areas of Bristol – which, alongside a large and growing student population, there is potential to create further competition within available housing stock. • Bristol has the third highest figure of households placed in temporary accommodation out of the Core Cities and this number has almost doubled from 2020 to 2023, to 1,18850. • There were 58 street homeless people reported to the 2022 Autumn National Rough Sleep Street count, although this was slightly down on those reported in 2021.” <p>The Vision in Section 2 of the Plan fails to address the housing crisis which is acknowledged in the Forward of the plan – “recent reports have demonstrated that the current cost of a house is 9 times the average earnings. The last time houses were this expensive by ratio was 150 years ago. As a result, homeownership has fallen, and the private rented sector is back to levels not seen since the early 1980s”. It is noted in the Employment Topic Paper that “a number of economic forecasts have been developed for the council, all of which point to growth in the economy both in terms of jobs and economic output... They forecast that the number of jobs in the Bristol economy will increase by between 31,000 to 53,000 over the period 2023- 43. Between 6,100 to 16,000 of these will require the provision of new, additional office and industrial/warehouse space.”</p> <p>To support the economic growth a range and choice of housing is required to meet all needs including family housing, the failure to meet housing needs will have significant implications.</p> <p>Duty to Co-operate</p> <p>No Statement has been produced on the Duty to Co-operate, instead a progress report has been prepared (November 2023), which explains the intention to prepare a Statement of Common Ground which will be updated at each key stage of the local plan preparation.</p>		%2019.01.2024.pdf

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								<p>The document should have been made available as part of this Reg 19 consultation.</p> <p>The plan has reached the Pre-Submission stage, and no such Statement of Common Ground has been prepared.</p> <p>The NPPF states that authorities should produce, maintain, and update one or more statement(s) of common ground, throughout the plan-making process. Local planning authorities are also bound by the statutory duty to cooperate.</p> <p>The Statement of Common Ground “should document where effective co-operation is and is not happening throughout the plan making process and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries. In the case of local planning authorities, it also forms part of the evidence required to demonstrate that they have complied with the duty to cooperate”.</p> <p>Paragraph: 010 Reference ID: 61-010-20190315</p> <p>Bristol City Council and its neighbouring authorities throughout the West of England has a long history of co-operation, but unfortunately this has not been positive as the West of England JSP was withdrawn at the examination stage and the WECA Spatial Development Strategy has been permanently halted, no draft versions of the SDS had been produced and so the authorities had not concluded any agreements on the detail of the cross-boundary policies. There is therefore a long history of unsuccessful collaboration around plan making and a failure to meet the housing needs of the area which is being compounded by the Bristol Reg 19 Plan. As set out in response to Policy H1 there is a significant housing shortfall of approximately 26,000 dwellings in Bristol City alone.</p> <p>The Progress Report (Nov 2023) at para 3.1.5.2 acknowledges that there is an unmet need from Bristol City that cannot be accommodated within the Bristol LP area. We consider that this has not been demonstrated and that there is some additional capacity within the Bristol area. For example, in March 2019 a site was included in the Reg 18 version but has been excluded from the Reg 19 version. (That site being Yew Tree Farm, Bridgwater Road which was proposed to be removed from the Green Belt, since then an SSCI designation has been proposed, however, the process of designation did not involve the landowner. SSCI is a local designation and should not be regarded as a “showstopper”, in fact as set out in our representations to Policy BG2 there can be advantages in terms of site management as a result of development on the site).</p> <p>It is noted that Bristol City Council formally requested through a letter dated 31 October 2023 that neighbouring authorities assist them in</p>		

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								<p>meeting their unmet needs. However, this letter refers to the LHN figure of 2,503 dpa rather than the full LHN of 3,380dpa based on the Standard Method. As demonstrated in Appendix 1 to these representations there is no justification for departing from the Standard Method.</p> <p>Whilst it is clear that this uplift should be met within those cities and urban centres themselves, this doesn't stop voluntary cross boundary redistribution agreements being put in place. At the time of submitting these representations – no responses are available from the neighbouring authorities. It is considered that the Plan is unsound and the Duty to Cooperate requirements have not been met.</p> <p>The new local plan does NOT set a direction which helps to deliver development needs today and shapes the city to meet the needs of the future. The new local plan will NOT help deliver the homes and workspace needed as there is a significant shortfall of housing need which is not being addressed elsewhere.</p> <p>An objection is made to the Vision. We reserve the right to comment on any Duty to Cooperate issues once the statement has been prepared and published. However, as currently prepared the Duty to Cooperate has not been met and the plan is unsound.</p>		
373	Knowle West Regeneration Residents Planning Group/Knowle West Future	Section 2 Vision: Building a better Bristol	P.5, para. 2.4 grey box	No	Positively prepared	-	Unsure	The Vision point is unclear as to what "Regeneration and development will be happening across the city with regeneration extending to more areas and sites" means. Is it extending the number of areas and sites beyond those identified here?	Change wording if needed to "...extending to more areas and sites including and beyond those identified in the Plan".	https://files.smartsurvey.io/a/C/TN8C8AC/Local%20Plan%20Final%20Covering%20Letter%20Jan%202024.pdf
425	Change Real Estate and Abri	Section 2 Vision: Building a better Bristol	Pages 5 – 10	Unsure	Positively prepared, Justified, Effective, Consistent with national policy.	Unsure	Unsure	Overall, the direction of the vision for Bristol to be a diverse and inclusive city is supported. The delivery of new and affordable homes and a high quality living environment is also supported. We welcome the delivery of at least 1,925 new homes a year but we would urge the Council to be more ambitious in making effective use of land within the city's boundary and maximising delivery on suitable sites in sustainable and accessible locations. We question whether the delivery of 1,925 homes reflects the capacity within the city limits and consider that further review is required to consider the city's housing land supply. The aim to ensure that the best use is made of existing	Given that existing site allocations were adopted in 2014, we believe that there should be a more detailed review of existing allocations to understand development capacity. Existing allocations have the capacity to deliver more development in the context of the strategy that promotes urban living and effective use of land in line with the NPPF (September 2023). This will ensure that the the development strategy optimises the city's capacity to deliver development on existing site allocations.	https://files.smartsurvey.io/3/1/IPGNIQ4G/237112696_20966066_3294031.pdf

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								development allocations is also supported. However, we are concerned that existing allocations in the Plan have not been fully considered in terms of the capacity to deliver housing to meet the strategy aims and objectives. In this context, we cannot be certain that the Plan is positively prepared, justified or effective when considering the aims and objectives for housing delivery.		
430	Dandara Living Developments Ltd	Section 2 Vision: Building a better Bristol	Paragraph 2.4, 2.6 and 2.7	No	Positively prepared, Justified and Consistent with national policy.	No	No	<p>Policy is not: Positively prepared, Justified and Consistent with national policy.</p> <p>Whilst we agree and support the high level vision set out in Para. 2.4 we object to the specific housing targets referenced as we do not agree this is sufficient to address housing needs within the City. This is further commented on in the Housing section below. We object to the aims and objectives in Paras. 2.6 and 2.7 for the same reason, notably the housing target of 1,925dpa.</p> <p>We also object to the objective of ‘addressing the needs of everyone in all parts of the city’ as the Objectives fail to include any reference to the needs of students and the targets for delivering Purpose Built Student Accommodation (PBSA). The Aims set out in Para. 2.7 state that development of student housing will be managed to safeguard existing communities whilst meeting student accommodation needs. This would seem paradoxical as the proposed policies do not meet student accommodation needs as further addressed below.</p>	-	https://files.smarturvey.io/a/F2S44E8Z/DandaraLivingRepresentations.pdf
445	SCIENCE CREATES	Section 2 Vision: Building a better Bristol	para. 2.4 and 2.7	No	Justified, consistent with national policy	Yes	Yes	<p>Policy is not justified or consistent with national policy</p> <p>(SEE ATTACHED FOR EMPHASIS)</p> <p>While we recognise the challenges in delivering housing in a physically constrained and growing city such as Bristol, there appears to be a lack of emphasis on economy and employment within the vision for Bristol.</p> <p>Paragraph 85 of the National Planning Policy Frameworks out that, in both planning policies and decisions (text emboldened for emphasis):</p> <p>“...Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global</p>	<p>(SEE ATTACHED FOR EMPHASIS AND STIKETHROUGHS)</p> <p>Amend text in Paragraph 2.4 as follows (new text in bold):</p> <p>“The vision for Bristol is of a diverse and inclusive city where inequality and deprivation have been substantially narrowed. The delivery of new and affordable homes through urban living will enable housing needs to be addressed and help to secure the development of rapid transit systems which deliver sustainable, connected communities. A city with a dynamic, diverse and productive economy, a high quality, healthy environment, with attractive open spaces, clean air, vibrant and inclusive sports and cultural facilities, cherished heritage and communities engaged in the development of their city.”</p> <p>Amend paragraph 2.7, bullet 3 as follows (new text in bold):</p> <ul style="list-style-type: none"> • “Enable the sustainable growth of our economy for 	<p>https://files.smarturvey.io/a/VVWEVAZ5/SCPartBCombined.pdf</p> <p>https://files.smarturvey.io/a/04JDI23B/SCRepresentationsreport.pdf</p>

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								<p>leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential”</p> <p>On this basis, we feel there needs to be a stronger focus on economy and innovation as well as housing in the vision and associated objectives, which should in-turn carry through the remainder of the plan. Otherwise, there is a risk of innovative employment uses being displaced by potentially more profitable, less niche uses that developers and funders understand more readily, such as offices and residential uses. The risks are effectively highlighted in Section 4.4 of the Bristol Employment Land Review (November 2023), which concludes the following in relation to industrial land:</p> <p>“Review of the industrial market in Bristol has highlighted demand outstripping supply, heightened particularly in the centre of Bristol where there has been no development since 2000...</p> <p>The deallocation of industrial planning policy protection has impacted security for occupiers in Bristol. Particularly where areas are identified for large scale growth and regeneration, further increasing the competition from higher value uses as a result, landlords are less willing to grant long term leases in order to capitalise on redevelopment opportunities and therefore, many businesses are being constrained....</p> <p>Outside of Avonmouth there has been a limited number of industrial developments. Notably within Bristol city centre there have been no new developments since 2000.”</p>	everyone, with a diverse range of modern workplaces, including industrial and innovation space alongside more conventional commercial	
448	Dominic Hogg	Section 2 Vision: Building a better Bristol	p.5	-	-	-	-	<p>The vision as set out makes no sense. In particular, it is difficult to know what to make of the sentence:</p> <p>The delivery of new and affordable homes through urban living will enable housing needs to be addressed and help to secure the development of rapid transit systems which deliver sustainable, connected communities.</p> <p>Does delivery really happen ‘through urban living’, and how does this ‘help to secure the development of rapid transit systems’? How does that part of the Vision come to fruition?</p> <p>The final sentence of the Vision reads:</p>	-	https://file.s.smartsurvey.io/a/U/X83UMCM/D Hogg Reps Report.pdf

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								<p>A city with a high quality, healthy environment, with attractive open spaces, clean air, vibrant and inclusive sports and cultural facilities, cherished heritage and communities engaged in the development of their city.</p> <p>There is not much to dislike here, but the question is whether the Plan enables this. There are good reasons to believe (for example, ongoing proposals for development, and the manner in which they are being appraised) that the quality of the development being proposed will be less than positive for the health of the occupants.</p> <p>Whether it does so effectively or not, or in line with the NPPF and national policy, the Plan is focussed on delivering housing and purpose built student accommodation, but its focus comes at the risk of excluding all else, and rather than allowing for local people to shape their surroundings, it presents a top down view as to how the City should look, with insufficient emphasis on the quality of design.</p>		
473	National Highways	Section 2 Vision: Building a better Bristol	P.5	No	Justified	-	-	<p>. A new local plan for Bristol</p> <p>Paragraph 1.5 states that it was originally intended that many existing Local Plan policies would be retained. However, we note that the Councils consider it necessary to rewrite the Local Plan, albeit that some policies remain similar to the original Local Plan. The assessments and evidence used to support the BLPR pre-submission Publication consultation include a sustainability appraisal and Infrastructure Delivery Plan (IDP). Objectives</p> <p>The housing target per annum is set at 1,925 homes to be delivered until 2040. However, we note the ambitious additional objective is: "Aiming to exceed our housing target where new infrastructure can unlock additional potential."</p> <p>The transport modelling scheduled to commence in February 2-24 should include a scenario that takes account of this objective (subject to new infrastructure being provided), to reflect a suitable higher number of dwellings being delivered. National Highways would welcome and recommend that the Council engage with us at the earliest opportunity to agree the scope of the necessary modelling work.</p> <p>Any transport infrastructure, services and investment identified as necessary to deliver the BLPR needs to be costed and confirmed as</p>	-	<p>https://files.smartsurvey.io/3/1/W2G2JYFS/237463260_20966066_3291744.pdf</p>

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								deliverable/viable, with funding sources identified. It will be necessary to work closely with developers and public sector partners including WECA, for key allocated sites to ensure they are committed to funding relevant aspects of infrastructure, services and other investment. We consider that this work needs to be undertaken now to ensure that we can determine whether the Local Plan policies regarding infrastructure investment are "justified" as per NPPF paragraph 35.		
492	CPRE Avon and Bristol	Section 2 Vision: Building a better Bristol	P.5	Unsure	Positively prepared	-	-	<p>Do you consider the plan to be 'sound'? The requirements for a plan to be sound can be found in the National Planning Policy Framework (paragraph 35). Unsure and yes ticked.</p> <p>CPRE Avon and Bristol recognise the Vision provides high level aspirations for the future of the city, and the Aims and Objectives set out the approach to development over the plan period. Given this we are concerned with overall housing numbers contained in the Vision and thus throughout the Plan. The Vision provides development figures to be achieved by 2025, 2030, through to 2040 and beyond the lifetime of the plan to 2050. By doing this the Vision 'locks in' those figures, regardless of any future climate, economic or environmental changes, as the policies are then designed to achieve these figures. There seems to be no mechanism for reducing levels of development should any of these changes necessitate it, particularly regarding the worldwide collapse in birth rates. CPRE has long pressed for a sequential approach to development such that the least sustainable sites (e.g. Green Belt) are reserved for the later stages of the Plan which would prevent developers seizing on the most profitable green field sites first.</p> <p>At a more general level, CPRE would like to see a broader Vision not simply driven by housing targets based on highly speculative population predictions. Most of the predicted increase in population comes from projected inward internal migration rather than natural change. The needs of existing residents are not prioritised in the sense that inflated housing provision will result in overcrowding, difficulties in moving around the City and reduced access to schools, medical care and other vital social infrastructure. The provision of housing in excess of need will itself encourage more inward migration and the Plan should take account of this feedback loop. In view of the declared climate emergency, the Plan should address fundamental questions of what sort of City we want, perhaps embodying some of the principles of 'doughnut economics' which targets a good life for all within the limitations of a sustainable planet rather than simply more economic</p>	<p>At a more general level, CPRE would like to see a broader Vision not simply driven by housing targets based on highly speculative population predictions. Most of the predicted increase in population comes from projected inward internal migration rather than natural change. The needs of existing residents are not prioritised in the sense that inflated housing provision will result in overcrowding, difficulties in moving around the City and reduced access to schools, medical care and other vital social infrastructure. The provision of housing in excess of need will itself encourage more inward migration and the Plan should take account of this feedback loop. In view of the declared climate emergency, the Plan should address fundamental questions of what sort of City we want, perhaps embodying some of the principles of 'doughnut economics' which targets a good life for all within the limitations of a sustainable planet rather than simply more economic growth.</p> <p>Para 2.6 refers to exceeding housing targets, where new infrastructure can unlock additional potential. CPRE Avon and Bristol suggests rewording the objective to aim for appropriate housing targets informed by climate, demographic, economic or environmental changes would be more suitable.</p> <p>Para 2.7. CPRE Avon and Bristol believe that the wording of the first two objectives at para 2.7 could be improved. Development of new and affordable homes is seen as a 'core objective' with no specific mention of sustainable development. The following objective seeks to 'actively respond' to the climate and ecological emergencies whilst also securing sustainable development. We suggest that 'addressing' (not just actively responding to) the climate and ecological emergencies are also seen as a 'core objective'. Overall, we are disappointed that the Vision, and therefore the whole of the Plan, is very development centric and pays little regard to climate change adaptation and mitigation. This will</p>	-

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								<p>growth.</p> <p>Paras 12.1.1-12.1.4. CPRE Avon and Bristol wants to reiterate its comments regarding the lack of emphasis on net zero and climate change in the Vision, and consequently the Aims and objectives and policies. We find it hard to reconcile the declaration of both climate and ecological emergencies by Bristol City Council with an overriding focus on development within the Plan. It is our view that development of the amount proposed and at the suggested densities will do little to help ameliorate the impacts of a changing climate. The very act of building in such numbers, on green sites and in the Green Belt appears contrary to climate change adaptation and mitigation aims. It is also disappointing to note that the Chapter dealing with net zero and climate change occurs towards the end of the Plan. What signal does this send to residents, developers and other stakeholders about the importance Bristol City Council attaches to these issues? We realise the Plan should be read as a whole, but we urge Bristol City Council to consider placing greater emphasis on net zero and climate change by including it 'front and centre' within the Vision and the Plan as a whole.</p>	<p>one of the main challenges facing Bristol residents and the country during the lifetime of this Plan, yet it is relegated to something akin to an 'add on'. The planning system and specifically the plan-led planning system is ideally situated to tackle these issues head on. CPRE Avon and Bristol consider this Plan is not ambitious enough in its approach to these issues due to its overriding emphasis on development. For the avoidance of doubt CPRE supports the development of affordable and social rent housing. We welcome para 6.16 in the supporting text to Policy AH1: Affordable housing provision which defines affordable housing as 'homes to rent or buy that are put in the reach of people not able to access market housing'. We expand on this further later in our response.</p> <p>CPRE Avon and Bristol believe the Green Belt and the city's green spaces, both designated and undesignated contribute to the overall character of the city. They are highly valued by current generations as places for recreation or for access to nature 'on the doorstep' both of which contribute to health and well-being and contribute to biodiversity. The need for access to and/or proximity to green areas is even more valued since the pandemic. To achieve the stated housing figures, this Plan promotes development across the city at increased densities. It is our view that this Plan risks altering the character of the city to the detriment of future generations, consigning them to live in a high density, nature depleted city. CPRE welcomes the promotion of urban living which focuses on brownfield land as this should, if applied vigorously and consistently, reduce developmental pressures on the city's few remaining green sites and its green belt. Notwithstanding this it is vital that new development enhances not erode the character of the city. We also welcome the objective to protect open spaces, promote food growing and increase the tree canopy.</p>	
493	Frank Bruce and Company Limited	Section 2 Vision: Building a better Bristol	P.5	-	-	-	-	<p>Frank Bruce and Company Limited are broadly supportive of the overall Vision, Aims and Objectives of the Regulation 19 Bristol City Local Plan as set out in page 5, 6 and 7 of the consultation document.</p> <p>3.2 We note the Local Plan focuses on 1) narrowing the gap between inequality and deprivation and 2) has a clear focus on delivering new and affordable housing (BLP para 2.4). We would propose that an additional reference to market housing be included in paragraph 2.4</p>	<p>3.2 We note the Local Plan focuses on 1) narrowing the gap between inequality and deprivation and 2) has a clear focus on delivering new and affordable housing (BLP para 2.4). We would propose that an additional reference to market housing be included in paragraph 2.4 alongside affordable housing. The supply of an adequate number of new market homes has the greatest potential to improve affordability in the medium</p>	<p>https://file.s.martsurvey.io/3/1/6L2JK65Q/238226257_20966066_3293523.pdf</p>

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
								<p>alongside affordable housing. The supply of an adequate number of new market homes has the greatest potential to improve affordability in the medium to long term and achieve the Local Plan vision for closing the inequality gap.</p> <p>3.3 We draw issue with the quantum of housing (detailed policy review is in section G below) and would strongly encourage the City Council to revisit its ambitions on housing delivery in recognition of the significant and damaging effects the ongoing undersupply of housing is having on those who live, or who aspire to live within the City. Should the City adopt increased housing delivery targets then we would strongly support these being include with the BLP page 5 vision box to ensure the plan is effective in meetings its own ambitions.</p>	to long term and achieve the Local Plan vision for closing the inequality gap.	https://files.smartsurvey.io/a/V1FLYJD8/Apendix%20A%20-%20Vision%20and%20Concept%20Testing%20Lawrence%20Hill.pdf
494	Royal London Asset Management	Section 2 Vision: Building a better Bristol	p.5-10	Unsure	-	Unsure	Unsure	<p>Overall, the direction of the vision for Bristol to be a diverse and inclusive city is supported, as is the delivery of new and affordable homes and a high quality, healthy environment. However, given that the NPPF confirms that planning policies should “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth...”, we consider that the vision could be more explicit and ambitious in supporting economic growth and the development of new employment space in the city. Similarly, just 2 of the aims and objectives refer to the delivery of new workspace, whilst 7 refer to housing delivery. We acknowledge that there is an acute housing need that must be addressed through the Local Plan to support the provision of suitable accommodation for a growing workforce. However, the delivery of quality workspace that supports job creation and retention within the city, continues to grow the strong economic platform that Bristol has and attracts inward investment to the city, is also important. In this context, the vision and development strategy need to consider that the demand for office floorspace is being driven by quality, particularly ESG credentials. This is evidenced within the Bristol Employment Land Review (JLL, June 2023) where it states that occupiers at all scales from corporate to sub-5,000 sqft are focusing on ESG requirements when looking for office space (Page 17). Coupled with attracting inward investment as part of the Big Six office markets, it is important that the development strategy and planning policies reflect the need to be flexible and responsive to encourage renewal of office stock. Importantly, to remain competitive to attract office occupiers and investors, BCC policies need to be congisant of the viability of delivering high-grade</p>	The aims and objectives should be strengthened to include an additional objective as follows: “Develop and renew workspace through intensification and delivery of new office, industry and distribution floorspace across the city”	https://files.smartsurvey.io/a/YQX7C8C5/RLAMRepsLetter.pdf

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								office floorspace on, often complex, city centre sites. In this context, policies should be careful not to burden development with onerous planning obligations that are disproportionate and potentially damaging to delivery.		
495	BRISTOL PARKS FORUM	Section 2 Vision: Building a better Bristol	P.5	No	Positively prepared and consistent with national policy.	Unsure	Unsure	<p>If you selected 'no', do you consider the Bristol Local Plan to be unsound because it is not: Positively prepared and consistent with national policy.</p> <p>Central Government announced that it no longer supports the concept of 15 minute cities.</p> <p>The Vision Text is not in compliance with the National Planning Policy Framework Para 7</p>	<p>Replace the goal of a 15 minute city, with a 10 minute one based on One City Plan. Having a goal based on infrastructure/facilities with a indicative time can focus attention on accessibility related issues.</p> <p>“As it updates the statutory development plan for the city, the new local plan aims to establish a planning approach which contributes to the achievement of sustainable development in a sustainable manner”.</p>	https://file.ssmartsurvey.io/a/5/UEZ436O/BPF REP REDACTED .pdf https://file.ssmartsurvey.io/3/1/BGHYNBFJ/238320217_20966066_3290847.pdf

General comments by chapter – Section 2: Vision: Building a better Bristol – Supporting representations

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Soundness	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Support for the plan	Supporting documents
190	FISHPONDS COMMUNITY PLANNING GROUP	Section 2 Vision: Building a better Bristol	P.13	-	-	Unsure	Unsure	(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT SEE ATTACHED) Fishponds Community Planning Group supports the need for new homes, and the emphasis on affordable housing. New homes must be truly affordable, including social housing for rent. We support the efficient use of under-used land. We believe that all new housing must be designed and built to high standards, and must be supported by adequate additional community infrastructure including improvements to roads and public transport. To achieve the goal of delivering a “15 minute city”, new developments must be supported by social infrastructure including access to primary and secondary healthcare including pharmacies and dentists; and by adequate primary and secondary school places to meet the needs of the growing population.	https://file.s.martsurvey.io/3/1/XTGYDNWJ/23627075_9_20966066_6_3293960.pdf
245	Live West	Section 2 Vision: Building a better Bristol	P.13	Yes	-	-	-	LiveWest are pleased to see that in the vision for Bristol there is a focus on affordable homes, including the delivery of new and affordable homes to enable housing needs to be addressed. At a time when 20,000 households are currently on the waiting list and 1,300 are in temporary accommodation, building more affordable homes is key to meeting this demand and continuing to tackle the housing crisis.	https://file.s.martsurvey.io/3/1/5051Q2JT/236335247_20966066_3293346.pdf
250	University Hospitals Bristol and Weston NHS Foundation Trust	Section 2 Vision: Building a better Bristol	Paragraphs 2.1 - 2.4, page 5	Yes	-	Yes	Yes	<p>UHBW can confirm its general support for the Council’s proposal to refresh its development plan policies to bring them up-to-date and in full compliance with national planning policy provisions. The move to a single comprehensive Local Plan is also supported.</p> <p>However, as part of the Local Plan process UHBW is keen to ensure that the Council’s longstanding planning policy support for new hospital development and related investment within the city centre hospital precinct continues to be carried forward in the new Local Plan.</p> <p>The hospital precinct is the home of a major public sector institution that makes a significant contribution to both the economy and mix of uses in the city centre, and this has been consistently acknowledged by the Council in the various iterations of its development plan policies over many years.</p> <p>UHBW has completed a lengthy strategic asset management cycle that commenced some time ago. To date, implementation has focussed on the development and optimisation of core clinical facilities to significantly improve adjacencies and co-locations of key services, and to retire estate that is no longer fit for purpose. This approach has resulted in the expansion of core clinical accommodation, elimination of poor-quality accommodation, and improvements in the built environment.</p> <p>The substantial work has positively transformed many aspects of the estate and, most importantly, the services it offers to patients and staff. The culmination of this strategy is now affording UHBW an opportunity to both take stock of its future priorities and consider the next steps in the asset management cycle.</p> <p>Within Bristol, UHBW operates primarily from its main hospital precinct at the Bristol Royal Infirmary (BRI), with the majority of its administrative and clinical buildings all within walking distance of each other. The hospital precinct has undergone major redevelopment in recent years.</p>	https://file.s.martsurvey.io/a/3/HCVJTO2/UHBW%20-%20Final%20BLP%20Reps%20-%2025.1.24.pdf

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								<p>Additional clinical space in the eastern part of the precinct is an anticipated requirement within the next five years. This part of the site could be sensitively redeveloped to provide high quality hospital buildings and associated public realm and transport improvements fit for the 21st century.</p> <p>While the focus of UHBW's activities is at the BRI precinct, it also has significant facilities elsewhere in the city – e.g. South Bristol Community Hospital and the Central Health Clinic.</p> <p>UHBW supports the Council's vision for Bristol, as described at paragraph 2.4. In particular, the references to reducing inequality and deprivation, and delivering a healthy environment are welcomed.</p>	
278	Crest Nicholson Partnerships and Strategic Land	Section 2 Vision: Building a better Bristol	Page 5	Yes	-	Yes	Yes	<p>Vision</p> <p>2.2 The Vision for the Local Plan is set out on page 5. It sets out how Bristol will change and how the plan's aspirations will be realised. In particular, the vision sets out that by 2025 the new Local Plan will be in place, delivering 2,000 new homes a year across the city; that by 2030 an additional 15,000 new homes will have been built since 2022, and that by the end of the plan period in 2040 an additional 34,650 new homes will have been built in Bristol.</p> <p>2.3 We support this strong vision for the city of Bristol, which includes a strong commitment to building the homes that people need and has a robust timescale which will enable the Council to monitor its progress to realising the plan's aspirations.</p>	https://file.ssmartsurvey.io/a/7RHMG1BT/CRESTNICHOLSONREPRESENTATIONREPORT.pdf
299	Alan Carpenter	Section 2 Vision: Building a better Bristol	2.7 P6	Yes	-	Yes	Yes	The desire to promote developments in the city centre must recognise the sensitivities needs and of existing and future residents.	-
408	University of the West of England	Section 2 Vision: Building a better Bristol	p.5-10	-	-	-	-	<p>*PLEASE SEE REPORT ATTACHED FOR SUBSTANTIVE COMMENT*</p> <p>UWE Bristol welcome and share the aims and objectives of the draft Local Plan. UWE Bristol are committed to developing projects that involve healthy, safe, sustainable and inclusive campuses and spaces.</p> <p>A core objective of the Plan is to significantly increase the number of new and affordable homes that are delivered. In addition, the plan seeks to support the thriving universities by meeting student accommodation needs. UWE Bristol wholly supports both of these ambitions. The delivery of much needed new homes including student accommodation will need to be balanced alongside other land uses including commercial and community facilities to ensure sustainable growth for all.</p> <p>The Plan also seeks to actively respond to the climate and ecological emergencies in securing sustainable development and seeks to make efficient use of under-used land which includes transforming some areas of the city to create communities with new homes, workplaces and public open spaces. These aims are wholly supported by UWE Bristol.</p> <p>Reviewing a Development Plan at least every five years is now a legal requirement for all local plans. It is crucial that the Plan remains relevant in addressing the challenges facing Bristol and can take advantage of emerging opportunities. It is essential that Bristol keeps up with the need for new development if it is to continue to be a world class city in which to live, work and study. The commitment to reviewing the Plan after five year is noted and supported.</p>	https://file.ssmartsurvey.io/a/58BSL6O1/BSA0502%20Site%20plan%20suggested%20amendment.pdf https://file.ssmartsurvey.io/a/4BLAGN6O/UoB%20and%20UWE%20

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									20Joint%20Impact%20Statement%20(Jan%202023).pdf https://files.smartsurvey.io/3/1/JQ7JCCAR/236866007_20966086_3214402.pdf
440	ABRDN PLC	Section 2 Vision: Building a better Bristol	PP.5-6	-	-	-	-	<p>(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT - PLEASE SEE ATTACHED)</p> <p>Abrdn welcome and share the aims and objectives of the draft Plan. A core objective of the Plan is to significantly increase the number of new and affordable homes that are delivered. Abrdn supports this ambition to substantially increase housing delivery in Bristol – this represents an important step in the right direction, but this must be matched by a robust approach ensuring that development will be viable and hence delivered. The delivery of much needed new homes will need to be balanced alongside other land uses including commercial and community facilities to ensure sustainable growth for all.</p> <p>The Plan also seeks to actively respond to the climate and ecological emergencies in securing sustainable development and seeks to make efficient use of under-used land which includes transforming some areas of the city to create communities with new homes, workplaces and public open spaces. These aims are wholly supported by Abrdn.</p> <p>Reviewing a Development Plan at least every five years is now a legal requirement for all local plans. It is crucial that the Plan remains relevant in addressing the challenges facing Bristol and can take advantage of emerging opportunities. It is essential that Bristol keeps up with the need for new development if it is to continue to be a world class city in which to live and work. The commitment to reviewing the Plan after five year is noted and supported.</p>	https://files.smartsurvey.io/a/ZV8L2MH6/ABRDN PLC REPS REPORT.pdf
442	BRISTOL ALLIANCE LIMITED PARTNERSHIP	Section 2 Vision: Building a better Bristol	PP.5-6	-	-	-	-	<p>(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT - PLEASE SEE ATTACHED)</p> <p>BALP welcome and share the aims and objectives of the draft Plan. BALP are committed to developing projects that involve creating lasting, liveable places which aligns with the Plans overall vision.</p> <p>A core objective of the Plan is to significantly increase the number of new and affordable homes that are delivered. BALP supports this ambition to substantially increase housing delivery in Bristol – this represents an important step in the right direction, but this must be matched by a robust approach ensuring that development will be viable and hence delivered. The delivery of much needed new homes will need to be balanced alongside other land uses including commercial and community facilities to ensure sustainable growth for all.</p> <p>The Plan also seeks to actively respond to the climate and ecological emergencies in securing sustainable development and seeks to make efficient use of under-used land which includes transforming some areas of the city to create communities with new homes, workplaces and</p>	https://files.smartsurvey.io/a/744UQZYA/BALP REPS LETTER.pdf

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Soundness	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Support for the plan	Supporting documents
								<p>public open spaces. These aims are wholly supported by BALP.</p> <p>Reviewing a Development Plan at least every five years is now a legal requirement for all local plans. It is crucial that the Plan remains relevant in addressing the challenges facing Bristol and can take advantage of emerging opportunities. It is essential that Bristol keeps up with the need for new development if it is to continue to be a world class city in which to live and work. The commitment to reviewing the Plan after five year is noted and supported.</p>	
458	AEW UK Investment Management	Section 2 Vision: Building a better Bristol	P.5	Yes	-	-	-	<p>(REPRESENTATIONS SUBMITTED IN NON STANDARD FORMAT SEE ATTACHED)Housing Need</p> <p>4.1 The BCC Local Plan includes a housing requirement of at least 34,650 homes to 2040. These will be served by new transport services and will require the creation of new communities and neighbourhoods across the city. The Local Plan is supported by an evidence base including various evidence on housing, sustainability, habitat regulations assessment, and equality impact assessment. Although there is a housing needs position paper and housing needs assessment, there is no housing trajectory, setting out the detail of which sites have been accounted for in BCC reaching their number of committed sites, and fed into their identified housing need. This makes it impossible to assess if the sites accounted for are deliverable. Given that BCC is proposing a locally assessed housing requirement, rather than the standard method, which in effect reduces their housing requirement by 877 homes, an up-to-date housing trajectory and local housing needs assessment is essential. Without this evidence, the Local Plan does not demonstrate it can meet BCC's objectively assessed needs and has therefore not been positively prepared and fails the NPPF (paragraph 35) tests of soundness.</p> <p>4.2 One of the four objectives of the Local Plan is enabling the delivery of 1,925 homes a year up to 2040. Key aims of relevance to the site are:</p> <ul style="list-style-type: none"> • Promote urban living across the city with a focus on brownfield land encouraging developments of homes with urban character, form and design in well-designed, connected, healthy and accessible neighbourhoods which achieve a liveable environment; • Secure diverse and vibrant centres across the city to deliver the 15 minute city; • Take a plan-led approach to promoting areas with the potential to increase densities and make efficient use of under-used land; this includes transforming some areas of the city to create communities with new homes, workplaces and public open spaces; • Locate new sites for housing and mixed-use development and highlight sites with potential for housing development; and • Encourage innovation in the design, construction, and location of diverse housing solutions; diversify the housing offer, promoting new building types and tenures such as build for rent, housing for older people and self-build and community-led housing. <p>4.3 We are supportive of these objectives and consider that our client's landholdings in Broadmead present a significant opportunity to contribute to these by providing sustainable urban development, maximising development potential in the city centre, through conversion of existing buildings and brownfield development.</p>	https://file.s.martsurvey.io/a/I8ZG1PRA/AEW REP REDACTED.pdf
476	Historic England	Section 2 Vision: Building a better Bristol	P.5	Yes	-	-	-	<p>Historic England welcomes a commitment to "Cherish the city's historic environment and harness the benefits of heritage sensitive regeneration"; an objective providing a 'golden thread' for the whole Plan.</p>	https://file.s.martsurvey.io/a/L4IC47S2/REP_Redacted.pdf

General comments by chapter – Section 3: Development Strategy – Objections and proposed modifications

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
126	John Knight	Development Strategy	Key Diagram and Central Bristol Key Pp 12, 13,	Unsure	-	Unsure	Unsure	-	Pale green areas missing from the key and subsequent diagrams. Update diagrams.	-
188	North Somerset Council	Development Strategy	Following 3.3.36 page 54	Yes	Positively prepared	Yes	Yes	<p>Proposals adjacent to Bristol</p> <p>Page 54 contains a paragraph in a blue box referring to possible proposals for urban extensions in the Green Belt beyond Bristol's administrative boundary. What status does text in a blue box have within the plan. Is it a policy or just additional supporting text?</p> <p>It should be noted in relation to this paragraph that the government's approach to Green Belt has strengthened regarding protection to Green Belt stating in the WMS (19 Dec 2023) that 'there is generally no requirement on local authorities to review or alter Green Belt boundaries if this would be the only way to meet housing need'. Paragraph 145 of the new NPPF reiterates this approach stating that 'there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated'.</p> <p>The North Somerset Pre-submission Plan reflects this advice and no longer contains the same scale of growth close to the boundary with Bristol which was proposed in the Preferred Options (Reg 18) Plan.</p> <p>The paragraph at page 54 of the publication version of the Bristol Local Plan implies that proposals for urban extensions in the Green Belt around Bristol are likely to come forward. This is misleading and contrary to the government's approach to Green Belt. It is also the case that not all new allocations will be in the form of urban extensions.</p>	Delete text or revise wording.	https://files.smartsurvey.io/3/1/RCCMY06K/236257368_20966066_3236456.pdf
189	Elizabeth Blackwell Properties Ltd	Development Strategy	See comment	No	Effective	No	-	<p>3.1. No comments are made on the development strategy introduction text beyond the cross reference to previous commentary around the 1,925 home figure to 2040.</p> <p>3.2. The 'key diagram' on page 12 sets out a broad spatial depiction of the Development Strategy. It should be made clear that this is a broad illustration only, given the scope of the development locations do not align with the detailed locations. The location of designated centres, particularly more so for town centres, are also point references than</p>	See above.	https://files.smartsurvey.io/a/FN/YXA575/P19-2214/Bristol Local Plan Review Reg 19 Repts

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								their much larger linear arrangements, such as for Gloucester Road as it pertains to our Client's interests. 3.3. The Development Strategy as it pertains to PBSA within the following policies is objected to on the basis of under-delivery as detailed further in Policy H7.		23.01.24.pdf
229	The Westbury on Trym Society	Development Strategy, chapter 3, incl policies DS1, DS1A, DS2, DS3, DS4 & DS5 (NOTE REPRESENTATION REFERS TO 'DC' BUT CONTEXT SUGGESTS DS)	3.3, page 11,	No	Justified	Unsure	No	(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT SEE ATTACHED) With regard to the Duty to Cooperate, there appears to be no indication of any neighbouring authority prepared to consider taking any of Bristol's housing need. North Somerset, one of the neighbouring authorities, which might well be expected to be a candidate for this and is at the same stage in its plan-making process even asked Bristol if it could help with its housing requirement! Para 3.3 says 'To boost housing supply the plan has a special focus on urban living – the creation of characterful urban areas where people can live, work and socialise, relying on sustainable transport'. There seems to be a contradiction between the urban living approach, including the encouragement of tall buildings in Bristol, traditionally a city of low rise buildings, and design policies which expects development to 'contribute positively to local character and distinctiveness' (policy DPM1). Until recently tall buildings were previously identified as being in excess of 6 storeys. The definition of a Tall Building now has risen to 10 storeys, as set out para 13.1.26, part of the explanation to policy DC2: Tall Buildings. There has been disquiet amongst amenity societies and the Civic Society as to the application of the 'Urban Living' concept for Bristol. This has meant an exceptional number of very tall buildings being foisted on the city, the design of which has not been considered to be 'high quality design' as required by DC2. The development strategy proposals set out a number of areas where very high density development can be expected – the City Centre, Temple Quarter, St Philip's Marsh, Western Harbour and the Frome Gateway (policies DC1, DC1A, DC2, DC3,DC4 & DC5). The words 'Tall buildings in the right setting and of the right design may be appropriate' appear in the policies in respect of development of these areas. However, we have seen a number of tall buildings where the subjective judgement of	-	https://files.smartsurvey.io/3/1/OEKNISRM/234532488_20966066_3223065.pdf

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								<p>the city council has not matched that of the local population. Furthermore, the numbers of dwellings expected in areas where there is requirement to re-provide employment space means that there will be limited opportunities to do this as well as to provide the substantial additional housing numbers. We consider that this will lead to more emphasis on building tall and on sing such buildings randomly where opportunities are provided. Previous guidance on tall buildings in Bristol identified suitable locations. Anywhere else the onus was very definitely for the developer to justify more than 6 storeys.</p> <p>We have already forgotten the disasters that have occurred following the high-rise boom of the 1960s and 70s. High rise is not suited to family living in the UK to say nothing of the concerns that high rise has caused. It is unlikely to be the choice of families seeking social housing and we wonder how the issue of high maintenance charges on social landlords can be overcome.</p> <p>The current Mayor of Bristol has pushed through an agenda for building very tall buildings in and around the centre of Bristol. We believe the Publication draft has been pushed through while the Mayor remains in office. For example, there is no evidence of the Duty to Co-operate with neighbouring authorities having been given serious consideration. The draft expects the authorities to agree to provide a significant part of Bristol's housing need. We note, however, that North Somerset Council, which is at the same stage in its Plan preparation has issued a 'Duty to Co-operate Statement of Compliance' which advises that North Somerset Council asked Bristol City Council whether it could accommodate some of its housing provision!</p> <p>The strategy should recognise that there are large areas of Bristol, particularly the inner and outer suburbs where densification is likely to be harmful to the character of those areas. No account is taken of the contribution that is made to the historicity of both central Bristol and its many 'suburban villages'. We consider that at para 3.3, the Plan should state its intention to preserve the importance and character of these parts of the city.</p>		
345	Kevin Chidgey	Development Strategy	Policies DS1 – DS9 Development Strategy Areas	-	-	-	-	Paragraph 28 of The National Planning Framework states that "Non-strategic policies should be used by local planning authorities and communities to set out more detailed	-	-

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
								<p>policies for specific areas, neighbourhoods or types of development”.</p> <p>It is debateable whether policies DS1 – DS9 relating to the proposed development strategy areas comply with this requirement. Rather than setting out detailed policies and proposals they list general good practise development principles that can be drawn on and interpreted to support a wide range of possible development options. In a number of the proposed development areas it will be left to emerging and new non-statutory area planning and design frameworks to guide development. In others it looks as though it will be left largely to market forces to determine the pace, type / mix and scale of development.</p> <p>To a large extent this approach is understandable as it provides a flexibility that would not be possible were the Local Plan to prescribe detailed development proposals for each area that could only be altered through a formal review of the Local Plan. However, in trying to build in this room for manoeuvre the Local Plan ends up telling us little about what is likely to happen in each of the development areas. What buildings and activities will be retained? Where will residential development be promoted on a scale sufficient to create liveable communities? Where will it be appropriate to build tall buildings? etc. In being so vague there is a danger that delivery of the plan will depend largely on the whims and vagaries of the property market and we will end up with piecemeal development and poor urban environments.</p>		
368	Nightwatch	Development Strategy	p.11	-	-	-	-	<p>These sections of the Development Strategy highlight the core objectives for this local plan is homes. For a city to be effectively planned it needs to focus on all aspects of regeneration and development and to have justified ,effective and consistent plans which do not create a situation of conflict between uses or where the existing night time economy is either forced out of business or the ground and buildings which house them are only considered viable for housing.</p>	-	<p>https://file.ssmartsurvey.io/3/1/RTEME22Q/236597962_20966066_3170979.pdf https://file.ssmartsurvey.io/3/1/VXT27FQI/</p>

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										236597962_20966066_3270071.pdf
369	REDROW HOMES Ltd	Development Strategy	-	No	Positively prepared	Yes	No	<p>Plan is not positively prepared, justified, effective or consistent with national policy.</p> <p>The development strategy aims to meet the needs of the city's growing population through securing new and affordable homes within Bristol. However, the Plan is not proposing to meet housing needs in full, instead there will be a shortfall of approximately 26,000 dwellings over the plan period. Such a strategy is hardly consistent with the delivery of new and affordable homes being a core objective for the Local Plan.</p> <p>No evidence has been provided that illustrates how the housing supply can be boosted by a special focus on urban living.</p> <p>Table 2 in the Housing Need and Supply Position Paper November 2023 sets out the estimated delivery of homes from each of the sources of deliverable supply.</p> <p>The contribution from urban potential is expected to be 2,500 dwellings. This is based on potential capacity at November 2022 when the consultation took place on the Reg 18 Plan.</p> <p>It is noted that "The estimate for urban potential incorporates some land that has yet to be promoted for development and is effectively a large site windfall allowance."</p> <p>In terms of the source of deliverable supply (there are 7 categories in Table 2):</p> <ul style="list-style-type: none"> •Planning permissions and existing site allocations comprise 24.6% •Proposed allocations comprise 5.8% •Urban potential comprises 7.2% •Small site Windfalls 13% •Greenfield sits arising from proposed Green Belt boundary changes 3.3% <p>The category "Areas of Growth and Regeneration" provides an estimate in some cases derived from masterplans or spatial frameworks where these have been prepared, where they have not yet been prepared the estimated capacity</p>	<p>The Plan should be modified so that housing needs are met. Whilst regeneration and the use of brownfield sites is supported, not all the housing needs can be met by the focus on brownfield sites.</p> <p>Consequently, a range and choice of sites including greenfield sites needs to be provided in accordance with the NPPF.</p> <p>The Council has not provided the evidence to justify its approach, particularly when previously proposed allocations at the Reg 18 Plan in March 2019 have been excluded.</p>	<p>https://file.s.martsurvey.io/3/1/GOYSLLY3/236610038_20966066_3291418.pdf</p> <p>https://file.s.martsurvey.io/a/3L32ZV7S/Ap penidx%201%20Bristol%20Housing%20Need%20-%20Redrow%20Homes%20Jan24%20-%2019.01.2024.pdf</p>

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								<p>comprises a combination of urban potential and specific development proposals.</p> <p>In which case it is not clear if there is any double counting with the sites included for urban potential.</p> <p>It is noted that "The capacity estimate for areas of growth and regeneration, including specific estimates for each area, will be refined and set out in more detail in the SHLAA report." However, the SHLAA has not been published so there is no assessment/information available.</p> <p>The evidence base does not include an assessment of 5-year housing land supply.</p>		
430	Dandara Living Developments Ltd	Development Strategy	P.11	No	-	No	No	<p>Policy is not: Positively prepared, Justified and Consistent with national policy.</p> <p>Section 3 of the draft Local Plan sets out the approach to development of the city over the plan period in the Development Strategy. The formation of the draft Local Plan seems wrong in its approach as the Development Strategy sets out how the needs of the city will be met before identifying what those (objectively assessed) needs actually are. This seems to be a common theme throughout and specifically in relation to the Development Strategy for the regeneration areas set out in Policies DS1-DS14. Some of these policies refer to Development Frameworks which have or are in the process of being adopted or are to be prepared. Whilst such Frameworks are helpful to enable and coordinate development at a time when Bristol does not have an up to date Local Plan, the policies of the Local Plan should be strategic and evidence based, cannot be predetermined by any such Framework and must pass the tests of soundness set out by the NPPF, notably be the most appropriate strategy when considering reasonable alternatives.</p> <p>3.2 Notwithstanding comments on specific policies, as set out below and whilst Dandara Living object to the overarching approach of the Development Strategy as currently worded on the basis that it does not pass the tests of soundness as it is not positively prepared (does not meet objectively assessed needs), has not demonstrated it is justified (representing the most appropriate strategy) and is not consistent with national policy. Amending the Development Strategy to meet objectively assessed needs</p>	-	https://file.ssmartsurvey.io/a/F2S44E8Z/DandaraLivingRepresentations.pdf

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								and providing a more robust evidence base could enable the Development Strategy to meet the tests of soundness. 3.3 Dandara Living also object to the inconsistent approach within the policies for each area – for example some refer to density requirements or certain mix of units and others do not. There is also only a singular reference across all regeneration areas to BtR. Again, this proves that the Development Strategy and its policies fails the test of being justified. It should be noted however that Dandara Living do support the approach of identifying the regeneration areas with specific policies and associated Framework or SPDs and consider this Development Strategy approach could be made sound if it was amended to address objectively assessed need (commented on sections below) and was consistent in its policy approach to area. In respect of specific policy wording;		
468	NHS Bristol, North Somerset & South Gloucestershire ICB	Development Strategy	P.14	No	-	-	-	(REPRESENTATION SUBMITTED IN NON STANDARD FORMAT SEE ATTACHED) DS1 to DS14 Development Strategy Areas We support the Plan's overall spatial strategy that focuses growth in the most sustainable locations, with Development Strategy setting the scale of growth within areas and allocating land to meet the development needs of the area. We consider that the effectiveness of the Development Strategy in addressing healthcare infrastructure needs would be improved by a more consistent approach to identifying the broad locations and type of healthcare infrastructure required to support the level of proposed growth across Central, East, South, and North Bristol. This would provide for internal consistency within the Plan and provide clarity on how additional healthcare capacity will be delivered to meet the needs arising from housing growth. With Central and South Bristol as the focus of strategic growth, there will be a requirement to deliver a significant increase in healthcare infrastructure capacity in the settlements to support the cumulative demand from planned growth. The primary care facilities in these two locations are currently operating at capacity. To meet the proposed projected growth and additional population at these locations, new primary care-led facilities will need to be prioritised. The existing infrastructure will be unable to	(REPRESENTATION SUBMITTED IN NON STANDARD FORMAT SEE ATTACHED) We note the policy text for development strategy areas states that development will include "Infrastructure, services and community facilities required to support the new development". However all major development of more than 1,500 units in Bristol should seek to provide on-site primary care facilities in consultation with NHS bodies. While Policy IDC1 states that new development will deliver funding contribution towards healthcare, this needs to be reflected in the Development Strategy Policies DS1-DS14. To ensure the Plan is positively prepared and effective, we propose the following modifications (shown in italics) to the referenced policies: Proposed Modification to Development Strategy Policies DS1-DS14 inclusive: Policy text should include: • Development will ensure the provision of appropriate healthcare infrastructure on-site or appropriate financial contributions towards healthcare for new and/or improved facilities off-site to support new development.	https://file.s.martsurvey.io/3/1/7X2KRQM/Q/237415723_20966086_3291687.pdf

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
								serve the new residents without additional primary care facilities, making the new development unsustainable.	<p>Policy DS1 also states that development of new facilities or development and renewal of existing facilities will be encouraged including for hospital facilities. We support that hospital facilities are identified and would request the Council to also identify the provision of wider healthcare facilities especially primary care facilities such as GPs. Currently, the majority of GP surgeries across Inner City Bristol are experiencing significant capacity pressures and the proposed growth in Central Bristol would add further pressure to the system. To ensure the Plan is positively prepared and effective, we propose the following modification (shown in italics) to Policy DS1:</p> <p>Proposed Modification to Policy DS1:</p> <ul style="list-style-type: none"> Continuing consolidation and expansion on the University of Bristol and Bristol Royal Infirmary sites, at which the development of new facilities or the redevelopment and renewal of existing facilities will be encouraged. The development of university or hospital and other healthcare facilities elsewhere within the city centre will also be encouraged where they would accord with other relevant local plan policies 	
473	National Highways	Development Strategy	P.11	No	-	-	-	<p>Development Strategy</p> <p>Key Points</p> <p>As detailed above we note that strategic modelling assessment is programmed to be undertaken in February 2024. The BLPR will need to be underpinned by a robust transport evidence base to demonstrate that allocated growth can be safely accommodated, and to identify any mitigation that may be necessary to deliver the Plan's ambitions. Until we have reviewed this evidence we are unable to confirm our position on the development strategy area policies or the suitability or otherwise of any mitigation proposals.</p> <p>We note that for the majority of policies relating to development strategy areas, the transport text refers to "local highway improvements" and occasionally to "local and</p>	-	https://file.s.martsurvey.io/3/1/W2G2JYFS/237463260_20966066_3291744.pdf

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
								<p>strategic transport infrastructure". National Highways considers that the transport text in the development strategy policies should be informed by the outcome of the strategic modelling evidence. If SRN improvements or other forms of mitigation are found to be necessary to mitigate an unacceptable impact in terms of safety and capacity of the SRN, National Highways will require changes to policy wording. Revisions would be required to ensure that the impact will not result in an unacceptable safety impact and as such the Plan can be considered to be deliverable and therefore sound (as per NPPF).</p> <p>Specific Site and Policy Comments</p> <p>We understand from the consultation materials that the development strategy considers growth within the following four broad geographical areas:</p> <ul style="list-style-type: none"> • Central Bristol (with development strategy areas comprising the City Centre Development & Delivery Plan area; Temple Quarter; St. Philip's; Western Harbour; and Frome Gateway); • East Bristol (with development strategy areas at Lawrence Hill and Central Fishponds); • South Bristol (with development strategy areas at Central Bedminster and Brislington, a new neighbourhood at Bath Road and development allocations for new homes at South West Bristol); and • North Bristol (with development strategy areas at Lockleaze and Central Southmead). <p>National Highways is aware that Neighbourhood Plans also set out growth in various parts of the city outside of Local Plan Policy, such as at Hengrove Park. National Highways notes that policies relating to employment in specific parts of the city are covered in a separate Local Plan chapter and are addressed later in this letter.</p> <p>There is a lack of clarity regarding the scale of development at St. Philip's Marsh as it stated to be, "thousands of homes." As the quantum of development is undefined the impact on the SRN cannot be determined. There is also no indication as to the scale of non-residential development within each development strategy area.</p>		

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477	Business West and Bristol Property Agents Association	Development Strategy	p.11-60	-	-	-	-	<p>The Local Plan contains 10 areas of growth and regeneration, described as Areas of Growth and Regeneration (AGRs), of whom 9 of which are current Primary Industrial Warehousing Areas (sites of dedicated employment land). 93.</p> <p>The Local Plan is proposing to remove protections from 178 hectares from the total 412 hectares of Primary Industrial Warehousing Areas currently located within the Bristol urban area.³ This means a total of 43% of the land area within existing PIWAs will be removed in the current draft plan.⁴ This is something we strongly flagged as a concern at the last two rounds of the Bristol Local Plan consultation in 2019 and January 2023. 94.</p> <p>These areas will be mixed use and the Local Plan will remove protections on land use being solely B2 and B8. 95.</p> <p>If we assume a 40% site coverage on this 178 hectares of PIWA land, this equates to the removal from protection of approximately 7,700,00 sq ft of employment floorspace – or 715,000 square metres. 96.</p> <p>Given the current Local Plan has set out a significantly smaller target of 164,000 square metres as the net additional industrial and warehousing floorspace target for the city as a whole, this PIWA deallocated land total is a very large quantity of employment floorspace that may be vulnerable to loss. 97.</p> <p>Given the importance and quantity of this level of supply, we are concerned that the policy approach outlined within the Local Plan document is not clear enough, varies by AGR, is ‘emerging’ and not yet in place (rather than being detailed and confirmed), and is not robust enough in achieving or securing the level and type of required supply for the range of identified needs from these deallocated PIWAs and in the Local Plan employment evidence base. 98.</p> <p>The AGRs will involve a significant amount of residential provision and these residential numbers have been included in the housing supply numbers within the Local Plan. But there has not been an assessment of likely remaining space available for employment uses, once guideline densifications</p>	<p>*REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT - PLEASE SEE ATTACHED FOR DETAILS OF PROPOSED MODIFICATIONS*</p>	<p>https://file.ssmartsurvey.io/a/NUITNOX1/BusinessWestReps.pdf https://file.ssmartsurvey.io/a/KJS057TU/FINALHousingNeedintheWestofEngland-JointStatement22Jan2023BRISTOL.pdf</p>

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								<p>for residential are taken into account. This would give a clearer sense of likely provision of employment space , the quantification of net loss of space and what policy is required to protect these amounts or utilise remaining space better.</p> <p>99.</p> <p>We are concerned that the policies set out within both the Local Plan and within different emerging regeneration areas look too weak to properly secure the range and level of employment uses identified as needed in the Local Plan's evidence base.</p> <p>100.</p> <p>As stated by the JLL review "AGR policy encourages mixed use redevelopment. This is significantly increasing the risk of an accelerating loss of employment land particularly in central areas further straining the supply of available employment land" (JLL 23, pg 25).</p> <p>101.</p> <p>For example, the Topic Paper states that "Needs and objectives for each area need to be balanced against prevailing market conditions, opportunities and housing requirements. In the regeneration areas it is anticipated that a broad range of employment generating uses may come forward, with masterplanning steering the scale and location of future development" (Topic Paper para 7.5.6, our emphasis).</p> <p>102.</p> <p>Over the ten AGRs, there is not a consistent approach to policy or floor space targets.</p> <p>103.</p> <p>Most of the AGRs are at an early stage of development, and within this development more are characterised by 'frameworks' rather than masterplans – for example Mead Street and Frome Gateway.</p> <p>104.</p> <p>Frameworks have limited binding constraints on landowners and developers, making it harder to determine or guarantee the outcomes in terms of final provision of employment space.</p>		

General comments by chapter – Section 3: Development Strategy – Supporting representations

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Soundness	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Support for the plan	Supporting documents
493	Frank Bruce and Company Limited	Development Strategy- East Bristol	p.34	-	-	-	-	<p>Frank Bruce and Company Limited strongly support the Local Plan development strategy promoting new houses and employment opportunities in the East of the City. The recognition within page 34 of the 'strong arterial routes' also presents a highly sustainable opportunity to locate new urban high density living into those areas closest to the City Centre.</p> <p>We also strongly support the 'scope for increased growth' reference within the BLP page 34 highlighted text where infrastructure allows.</p>	https://files.smartsurvey.io/3/1/6L2JK65Q/238226257_20966066_3293523.pdf https://files.smartsurvey.io/a/V1FLYJD8/Appendix A - Vision and Concept Testing - Lawrence Hill.pdf
250	University Hospitals Bristol and Weston NHS Foundation Trust	Development Strategy	Paragraphs 3.1-3.5, Page 11	Yes	-	Yes	Yes	<p>UHBW supports the overarching principles of the stated Development Strategy. However, it is vital that in providing for the required number of new and affordable homes that there is appropriate investment in necessary infrastructure, including new healthcare facilities.</p> <p>UHBW's healthcare services are already operating at full capacity and the significant number of new homes being proposed within the plan period will only increase demand on already stretched healthcare resources. Significant housing growth must be accompanied by sufficient new healthcare (and other social) infrastructure.</p>	https://files.smartsurvey.io/a/3HCVJT02/UHBW - Final BLP Reps - 25.1.24.pdf

General comments by chapter – Section 6: Housing – Objections and proposed modifications

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
190	FISHPONDS COMMUNITY PLANNING GROUP	Section 6 Housing	P.75-77	-	-	Unsure	Unsure	<p>(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT SEE ATTACHED) A key objective of the Local plan is the delivery of new and affordable housing. Fishponds Community Planning Group supports this objective, and we see proposed development in Central Fishponds as contributing to enabling more housing in our area. Residents tell us that it is very difficult, if not impossible, for young people to find homes in the area due to high rents and higher house prices.</p> <p>The job site Joooble reports average individual salaries in Fishponds are £24,079. The Bristol Joint Strategic Needs Assessment describes most of the Fishponds area as a “middle income area, with average household incomes of £43,451-54,000. (Some parts of Hillfields ward have lower average household incomes of £32099-43,451). However, when adjusted to take account of housing costs, average household disposable income (net) after housing costs falls to £25,851 – £31,800 (and to 19,990 – £25,851 in parts of Hillfields). Data from March 2023, given in Bristol City Council Ward Profiles shows that average house prices - £320,500 in Frome Vale and £317,000 in Hillfields, putting most houses out of reach for the majority of local people.</p> <p>New housing in Fishponds must be both affordable and accessible for local residents, including those on lower incomes. (See also Policy AH1: Affordable housing provision)</p>	-	https://files.smartsurvey.io/3/1/XTGYDNWJ/236270759_20966066_3293960.pdf
278	Crest Nicholson Partnerships and Strategic Land	Section 6 Housing		-	-	-	-	<p>Chapter 6: Housing</p> <p>2.7 Chapter 6 sets out the approach of the BLP to providing new homes to meet housing need in Bristol.</p> <p>2.8 Paragraph 6.3 sets out the starting point that there is a clear need for new homes in Bristol. Paragraph 6.4 then sets out that the starting point for assessing housing need is the Standard Method as set out in the NPPF and NPPG, and that Bristol is one of the top 20 cities in England which are subject to a 35% uplift on the local housing need as calculated using the Standard Method.</p> <p>Paragraph 6.4 goes on to confirm that the local housing need for Bristol as calculated using the Standard Method is 3,380 homes a year.</p>	-	https://files.smartsurvey.io/a/7RHMG1BT/CRESTNICHOLSONREPRESENTATIONREPORT.pdf

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
								<p>2.9 We support the position set out in these paragraphs and the acknowledgement that Bristol's local housing need is 3,380 homes a year.</p> <p>2.10 Paragraphs 6.6 and 6.7 set out that the Council considers that the optimum position would be to accommodate housing needs within the Bristol City Council administrative boundary. However, recognising the Council's aspiration to balance growth in the city, ensuring that a range of uses will be provided to meet needs, and the limited availability of brownfield land it is unlikely that sufficient land will be found to meet all needs. The paragraph suggests that there is capacity in the city to accommodate 1,925 homes being delivered each year.</p> <p>2.11 Paragraph 6.8 then goes on set out that additional homes will need to be delivered elsewhere to ensure that the city's need for new homes does not go unmet, that the Council has been working with neighbouring authorities in North Somerset, South Gloucestershire and Bath and North East Somerset to agree that needs will be met, and that "local plans for those areas will address the approach to any unmet needs which they are able to accommodate."</p> <p>2.12 We support the approach set out in these paragraphs which confirms that under the Standard Method Bristol's housing need is 3,380 homes a year, that a capacity analysis of opportunities to accommodate housing need within the City Council's administrative area has revealed that a total of 1,925 homes a year could be accommodated, and that it is therefore the responsibility of neighbouring authorities to consider the proportion of Bristol's unmet need that they will accommodate. However, as set out below and given the position set out in paragraph 6.5, we do not believe that the Local Plan as a whole sets out a position that will ensure that all efforts are made to meet Bristol's local housing need in full.</p>		
368	Nightwatch	Section 6 Housing	p.67	-	-	-	-		All policies relating to development of all types of residential accommodation including student accommodation should have policy text ensuring the "Provision and retention of cultural and 24 Hour economy uses" and if the development includes any changes to an existing venue (currently operating or not) plot which is	https://files.smartsurvey.io/3/1/RTEM/E22Q/236597962_20966066_317097

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									<p>the red line of its current planning and its license then this should be treated as a total loss of a venue not a change as any adjustments to venues planning and license plots cause viability challenges and affects its social value.</p> <p>When plans are drawn up for residential developments near venues the internal layout of the living areas should ensure sleeping spaces are not attached to or facing areas of noise which are created by the existing venue. The Agent of Change policy helps in this regard but the design of this new accommodation should be designed to ensure the best quality of life for the community. So ensuring sleeping areas are the opposite side to the venue and community areas and service areas such as lifts and stairs are placed near the venue to act as an extra sound buffer.</p>	9.pdf https://files.smartsurvey.io/3/1/VXT27FQI/236597962_20966066_3270071.pdf
404	ElhPlan	Section 6 Housing	p.67-95	No	Effective	Unsure	No	No reference is made to the Meanwhile Use of development sites as locations for temporary structures to house homeless families - despite the city having live examples of this [as well as sites that have lain empty for several years [e.g. Homes England's site on the Friary].	<p>Meanwhile Use to accommodate Homelss Families should be required of all sites able to accommodate 4 or more container style temporay housing units, where the site is left empty for 1 year or more.</p> <p>This will have the additional effect of speeding up development start on site, where the developer wishes to avoid Meanwhile Use.</p>	-
261	Hotwells and Cliftonwood Community Association	Section 6 UL1, HS1 and AH1	Pages 63 to 70	Yes	Justified	Unsure	Unsure	<p>Housing</p> <p>30. Objection to Policy UL1, HS1 and AH1- Accommodation within the HCCA area is a mix of privately owned properties, private rentals, social housing, houses, and flats. There is a significant student population, a large number of houses in multiple occupation along the Hotwell Road as well as micro-communities living in deprivation.</p> <p>31. Overall, our local community would welcome the development of new and affordable homes in our neighbourhood in line with local need. We would like to see good quality homes for older people who could move from family houses and continue living in the area. We would also like to see more affordable homes. We are unhappy that we some of our area might be seen as City Centre with high density and affordable homes delivered based on viability rather than Bristol North West where 35% affordable homes would be a requirement of</p>	<p>32. As stated in the paragraphs above, HCCA is confused by the proposed scale of the development overall with figures quoted between 500-3500 new homes being created in the area. We cannot see how the upper figures could possibly be accommodated and this in turn would mean that the Local Plan Housing targets could not be met and the Plan therefore be unsound</p> <p>33. Change required to resolve objection -amend boundaries so that all Hotwells and Cliftonwood is described as Inner Urban and part of Bristol North West, and then reassess actual number of homes that might be achieved in well-designed new urban areas.</p> <p>34. Conclude Local Plan is unsound regarding its ability to deliver the number of homes proposed on Western Harbour and other sites within Hotwells and Cliftonwood area</p>	https://files.smartsurvey.io/a/VXW3CPV2/HCCA Obejction to Bristol Local Plan January 2024.pdf

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
								development. Evidence suggests we would achieve more affordable homes based on a 35% policy. Again, maps and boundaries of the different policies are inconsistent.		

General comments by chapter – Section 7: Economy and inclusive growth – Supporting representations

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Soundness	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Support for the plan	Supporting documents
190	FISHPONDS COMMUNITY PLANNING GROUP	Section 7 Economy and Inclusive Growth	P.120	-	-	Unsure	Unsure	(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT SEE ATTACHED) Fishponds Community Planning Group supports the Policy Text which requires an Employment and Skills Plan on all major developments. This is one of the mechanisms that will aim to integrate new development into the local community.	https://files.smartsurvey.io/3/1/XTGYDNWJ/236270759_20966066_3293960.pdf

General comments by chapter – Section 8: Centres, shopping and the evening economy – Objections and proposed modifications

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Falls test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
229	The Westbury on Trym Society	Section 8 Centres, shopping and the evening economy and SSE1	See attachment	No	Effective	Unsure	No	<p>(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT SEE ATTACHED)</p> <p>Westbury on Trym is exceptional in Bristol in that retains a unique rural village character with a shopping centre, the remnants of that which was developed in Victorian times remains, together with early and later twentieth century developments. Large parts of the village centre form part of the Westbury on Trym conservation area, one of the first to be designated in Bristol in 1972.</p> <p>The Westbury on Trym Society was established in 1972 originally to look after the amenities, landscape and historic settings of this 1300 year old village and is thus now over 50 years old. In conjunction with its concern for the amenity of the village, for a number of years the Society has been responsible for organising the plant and floral displays in the centre of Westbury on Trym, with the financial support of local residents and businesses. These displays help to brighten up and enhance the environment of the village and, we believe, help to attract visitors to the village.</p> <p>The Society has had a close relationship with businesses in the village centre through its work and its campaigning, but an active business association does not presently exist and hence the Society is making submissions in respect of the proposed chapter of the Local plan Review and policies on Centres, shopping and the evening economy.</p> <p>General</p> <p>The Society considers that the chapter on Centres, shopping and the evening economy will not be effective, is not sufficiently positive and elements are unjustified. This may in part be due to the inadequacies of the evidence base. Para 8.2 states ‘To maintain the ongoing success of these centres, the local plan proposes to recognise and support their role, enabling them to diversify in a way which keeps them at the heart of their local communities’.</p> <p>This sets the tone of the chapter and suggests that Bristol’s centres are performing well. We disagree. Along with many traditional local high streets and centres up and down the country, they are struggling to retain their role as retail centres and the introduction of the wrong type of uses will harm their character and function.</p> <p>The Society does not consider that the chapter reflects the</p>	-	<p>https://files.smartsurvey.io/3/1/C6VX3VPR/234532488_20966090_3164910.jpg</p> <p>https://files.smartsurvey.io/3/1/LF600U3Q/234532488_20966090_3223125.pdf</p>

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
								<p>evidence and recommendations of the Evidence Base – the Bristol Local Centres Study (November 2023). Furthermore, in relation to Westbury on Trym, we have found significant flaws in the assessment of the vacancy rate and composition of the floorspace of the village in 2022 and the situation in January 2024 is very much different to that in 2022 with a much higher vacancy rate. We very much suspect that the other town centres will have experienced similar increase in vacancy rates.</p> <p>To explain this concern, we have reworked table 2 of Appendix 4 of Nexus Planning – Centre Viability Report, BAS Consultancy (overleaf).</p> <p>Table 2 (p139 Westbury on Trym Healthcheck) Re-interpreted GOAD Category Units Jan 2022 – Nexus Planning Actual Units Jan 2022 - WoTSoC Actual Units Jan 2024 Units (%) Jan 2022- Nexus Planning Units (%) Jan 2022- WoTSoC Units (%) Jan 2024- WoTSoC Comparison 24 26 24 27.9 27.9 25.8 Convenience 9 9 9 10.5 9.7 9.7 Financial & Business Service 15 14 13 17.4 15.1 14.0 Leisure Service 14 13 14 16.3 14.0 15.0 Retail Service 20 21 21 23.3 23.6 22.6 Vacant 4 9 12 4.7 9.7 12.9 TOTAL 86 93 93 100 100 100</p>		

General comments by chapter – Section 9: Biodiversity and Green Infrastructure – Objections and proposed modifications

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
14	Jo Arnold to	Section 9 Biodiversity and Green Infrastructure	-	No	Effective	Unsure	Unsure	The proposals to build on many green spaces in Bristol represents a complete disregard to BCC saying they are committed to protecting green spaces in Bristol and the wildlife that depends on those green spaces. BCC need to seriously think about their role in protecting wildlife and their habitat. These green spaces are also very important to the mental health of the local community.	-	-
63	Manor Woods Valley Group	Section 9 Biodiversity and Green Infrastructure	9.1.2	No	Effective	Unsure	Unsure	" The development strategy aims to ensure that these objectives are not in conflict. They work together to ensure the new development we need includes a gain in biodiversity that contributes to meeting our ambitious and essential targets for nature. " - but there can be no biodiversity net gain for developments that severed ecological linkages or continuity!	-	-
63	Manor Woods Valley Group	Section 9 Biodiversity and Green Infrastructure	9.1.10-Explanation p125-	No	Effective	Unsure	Unsure	"9.1.10 ... The requirements for nature mean that all new development should contribute to nature recovery and biodiversity, not only those developments subject to specific net gain requirements (see Policy BG3 'Achieving biodiversity gains')" - Why not 'must contribute'?" "9.1.11 Wider ecological networks are reflected in the West of England Nature Recovery Network, which will be supplemented in due course by more detailed local ecological network mapping for Bristol. These will form a part of a future Local Nature Recovery Strategy for the area." - But sites that could form part of the ecological network yet to be mapped risk being allocated for development in this plan. The mapping should take place before any greenfield sites are allocation for development. "9.1.13 In order to demonstrate compliance with this policy, Green Infrastructure Statements proportionate to the scale of development proposed should be	Tighten up the language as discussed above	-

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
								<p>submitted with planning applications. These statements should set out how the development will incorporate green and blue infrastructure that provides for a range of functions as set out in this policy."</p> <p>- the word 'must' to be used here – 'should' allows too much wiggle-room.</p> <p>"9.1.14 The policy does not allow for the inclusion of artificial grass within the landscape treatment of development because that form of surfacing does not support biodiversity gain or nature recovery in development."</p> <p>We support this statement and expect to see it enforced during and post-development.</p> <p>"Pollinating insects: Bees and other pollinating species are vital to our biodiversity and food production. The local plan's policies for nature conservation and habitats aim to maintain a healthy ecosystem and link the city's wildlife networks with the wider area. Through the policies in the local plan and supplementary planning documents and frameworks, the council will secure species beneficial to pollinating insects as part of the required green infrastructure in development proposals. "</p> <p>- We support this statement and expect to see it enforced during and post-development.</p>		
63	Manor Woods Valley Group	Section 9 Biodiversity and Green Infrastructure	9.1.1	No	Effective	Unsure	Unsure	<p>"Bristol's One City Ecological Emergency Strategy sets out the need to reverse wildlife decline and make space for nature alongside meeting our targets for the sustainable development of more homes, better transport systems and an economy that works for everyone."</p> <p>- We welcome this acknowledgment of the 'need to reverse wildlife decline and make space for nature' and therefore query why there is any allocation of greenfield sites for development in this document.</p>	-	-

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
63	Manor Woods Valley Group	Section 9 Biodiversity and Green Infrastructure	9.1.3	No	Effective	Unsure	Unsure	<p>"The local plan sets an overall framework which supports nature recovery and biodiversity by:</p> <ul style="list-style-type: none"> „ Setting out a development strategy focused on making the best use of previously developed land; „ Identifying and protecting an extensive network of open space as Local Green Space and Reserved Open Green Space (policies GI1 to GI4); „ Setting a new framework of policies to address net zero and climate, addressing climate action as the context for nature recovery; and „ Supporting and encouraging food growing in the city" <p>- We welcome these statement, but comment that the latter bullet point will require land that has not already been allocated for development.</p>	Don't make development allocations on any potential food growing areas.	-
63	Manor Woods Valley Group	Section 9 Biodiversity and Green Infrastructure	9.1.4	No	Effective	Unsure	Unsure	<p>"The policies below support these approaches by integrating nature recovery, biodiversity gain and nature conservation into the development process so that new development can come forward alongside overall gains for nature."</p> <p>- We welcome, and test this document against, this statement.</p>	-	-
188	North Somerset Council	Section 9 Biodiversity and Green Infrastructure	-	Yes	Positively prepared	Yes	Yes	<p>We have no specific comments on the policies within this chapter. However, potential adverse impacts arising from new development on international designations have been identified in relation to the Avon Gorge and Severn Estuary. This potentially arises from development proposed in both the North Somerset and Bristol Local Plans. North Somerset and Bristol City have commissioned separate consultants to advise on HRA mitigations.</p> <p>Discussions are taking place with consultants, Bristol City and Natural England on the HRA findings and potential mitigations in relation to air quality and visitor management at the Avon Gorge and visitor management pressures on the Severn Estuary with a view to co-ordinating an approach.</p>	-	https://files.smartsurvey.io/3/1/RCCMY06K/236257368_20966066_3236456.pdf

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
369	REDROW HOMES Ltd	Section 9 Biodiversity and Green Infrastructure	Policy BG2: Nature conservation and recovery	No	Positively prepared, justified, effective or consistent with national policy.	Yes	No	<p>Plan is not positively prepared, justified, effective or consistent with national policy.</p> <p>An objection is made to Policy BG2: Nature conservation and recovery. The policy seeks to identify the hierarchy of sites designated for nature conservation to ensure they are appropriately protected in relation to the features for which they are designated, which is welcomed, being in line with national policy, and the Environment Act 2021. However, the wording of the policy itself is unnecessarily restrictive in relation to locally designated sites (Sites of Nature Conservation Interest – SNCIs), which receive no statutory protection and are of importance at a local (county) level only. The policy states that no development would be permitted on SNCIs as shown on the policies map, however this is a purely spatial representation and does not reflect the aim of the policy as set out in paragraph 9.1.20 which seeks to protect sites “in relation to the features for which they are designated”. Policy DM19 within the adopted Site Allocations and Development Management Policies document within the current Bristol Local Plan (Site Allocations DPD) provides a more appropriate approach recognising that development should not be permitted where there would be a “harmful impact on the nature conservation value” of a SNCI. Indeed this can be demonstrated as permission was granted (on appeal 17th April 2023) for residential development at Brislington Meadows ref 22/01878/P for 260 homes. The site is entirely within the SNCI as shown on the proposals map P32. https://pa.bristol.gov.uk/online-applications/files/A3B0CA66682ACA355135093A80CD6C58/pdf/22_01878_P-APPEAL_ALLOWED-3438812.pdf Given the lack of statutory protection, there is no obligation on landowners to manage and maintain a SNCI to ensure its condition or the nature conservation interest for which it is designated is not degraded. Policy BG2 does not allow for consideration of the specific criteria for designation of a SNCI to be considered and is a spatial representation only which is not appropriate to ensure suitable long term protection and enhancement. It also indicates no hierarchy of consideration, applying</p>	<p>It is therefore proposed that Policy BG2 is reworded to state: “...Local: - Development which would have a significantly harmful impact on the features of importance for which local wildlife and geological sites are designated, comprising Sites of Nature Conservation Interest (SNCIs) and Regionally Important Geological Sites (RIGS) as shown on the Policies Map, will not be permitted.” The issue being that a judgment would need to be made as to whether there would be significant harmful impact. As raised above in our objection, development can have a positive effect in so far as the site could positively managed. It is also proposed (given that the land at Yew Tree Farm was a previously proposed allocation for housing and given the severe housing shortfall in the Local Plan) that the allocation of the land at Yew Tree Farm be re-instated given that through the application of high quality and appropriate development design it provides the opportunity to ensure the long term protection and enhancement of the SNCI and provide huge benefits to both people and wildlife.</p>	<p>https://file.s.smartsurvey.io/3/1/GOYSLLY3/236610038_20966066_3291418.pdf</p> <p>https://file.s.smartsurvey.io/a/3L32ZV7S/Ap penidx%201%20Bristol%20Housing%20Need%20-%20Redrow%20Homes%20Jan24%20-2019.01.2024.pdf</p>

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
								<p>the same level of protection as to nationally important sites which are also statutorily protected. We objected to the Plan at the Reg 18 stage in January 2023 as the land at Yew Tree Farm, Bedminster Down, adjacent to the A38 was no longer included in the Local Plan as a proposed allocation to be removed from the Green Belt. In the latest version of the Local Plan Review i.e. Reg 19 Plan, the new proposals map, the SNCI designation to the north is proposed to be extended to include the previously proposed allocation of Yew Tree Farm, due to a local campaign. The criteria for designation of the Yew Tree Farm SNCI focuses on the presence of priority (BAP) habitats and species, which have been identified namely the hedgerows (as the pond referenced is dry and not priority habitat) and presence of priority species including dormice. The grassland habitat which is spatially mapped as part of the SNCI extension is not a reason for designation – as detailed in the evidence base to support the SNCI designation, surveys by a naturalist “didn’t find any plant species that are particularly rare” and the grassland “is not herb-rich”. As such in this case the main interest and nature conservation importance for which the site is designated is the hedgerows, associated ecotone habitat adjacent and the priority species it supports (the pond referenced is dry and does not qualify as priority habitat). Allocation and future development of the site through application of the mitigation hierarchy to focus development on the areas of grassland of lower ecological importance would offer an opportunity to deliver genuine net gains for biodiversity and long term protection and enhancement of the SNCI features of interest. The requirements of the Environment Act (which necessitates a minimum 30 year Habitat Monitoring and Management Plan) would ensure habitat creation and long-term enhancement and management of priority habitat (hedgerows), also securing maintenance of opportunities for priority species (including inter alia dormice) thereby ensuring the nature conservation interest for which the SNCI is designated, is protected. This would also enhance the resilience and coherence of the ecological network including creating more, bigger, better and joined up</p>		

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
								<p>areas, in line with the Environment Act 2021. The reliance on spatial mapping of the SNCI in the wording of Policy BG2 prevents the long term objective for the policy from being realised as there is no guarantee that the interest for which a site has been designated will be maintained without appropriate management, for which there is no statutory obligation for a landowner.</p>		

General comments by chapter – Section 9: Biodiversity and Green Infrastructure – Supporting representations

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Soundness	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Support for the plan	Supporting documents
190	FISHPONDS COMMUNITY PLANNING GROUP	Section 9 Biodiversity and Green Infrastructure	P.131	-	-	Unsure	Unsure	(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT SEE ATTACHED) Fishponds Community Planning Group supports the statement: As we develop more homes, businesses and communities it is essential that we continue to carefully conserve open space infrastructure such as parks, playing fields, nature reserves and green lungs of natural space.	https://file.s.martsurvey.io/3/1/XTGYDNWJ/236270759_20966066_3293960.pdf
395	Your Park Bristol & Bath	Section 9 Biodiversity and Green Infrastructure	Whole section - Policies:BG1 to BG7, GIA & GI1 to GI3	Yes	-	Yes	Yes	(SUBMITTED AS SINGLE REPRESENTATION - DIVIDED UP TO REFER TO SPECIFIC POLICIES SEE ATTACHED PART B) In our view the Local Plan, as published for review, achieves a reasonable balance between the various competing needs for space in the restricted area of the City. There is a limit as to how much development can be accommodated within the Bristol City boundaries while providing a healthy environment for its residents, workforce and visitors. The urban area of the City extends beyond the Local Authority boundaries and the whole of this area should be considered in planning terms; it is right that some of the housing demand should be met by surrounding authorities if the alternative is to lose green space in the City. In considering Green Space we note the figures in the Council's Parks and Green Spaces Strategy that was published for consultation in December 2023 and is due to be adopted in March 2024. This makes clear that the current supply of publicly accessible green space in the City will fall short of the Natural England Green Infrastructure Standards given the likely increase in population. As such it is vital that the existing publicly accessible green space is protected and indeed increased where possible in new developments. Our work has already made clear the challenges of addressing the different calls on the use of green space which is needed to support local and national policies on health & wellbeing (including play) biodiversity, flood prevention and food growing amongst others. We therefore also support the policies in Section 9 of the Local Plan on 'Biodiversity and Green Infrastructure' (BG 1 to BG7) which will ensure that the need for green space is considered in new developments in the City. "Improving access to greenspace: A new review for 2020" published by Public Health England in March 2020 has as its first policy recommendation that local government should: "Consider local green (and blue) space to be critical assets for maintaining and supporting health and wellbeing in local communities. The evidence base linking health and greenspace is compelling, and supports innovative thinking about its potential to help achieve local priorities." We consider the Policies within this Plan support this aim and as such this publication version should be considered sound in respect of the above policies.	https://file.s.martsurvey.io/a/23Z145MH/YOUR PARK BRISTOL&BATH PART B (MULTIPLE REPS).pdf

General comments by chapter – Section 10: Transport – Objections and proposed modifications

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
303	David Gray	Section 10 Transport	Paragraph 10.4 on page 141	No	Effective	-	No	<p>Paragraph 10.4 says that the One City Climate Strategy “outlines the necessary actions to reduce emissions including a 40% reduction in vehicle miles by 2030 and assuming 90% of remaining vehicles are Ultra Low Emissions Vehicles”. Although this is a challenging target it has to be met by 2030, only one third of the way through the plan period.</p> <p>The typical times taken from receipt of a substantial planning application to occupation of the first workplace or residence is unlikely to change and those times are long enough to make it unlikely that the plan will have much effect on vehicle miles by 2030.</p> <p>However, the challenge of climate change is such that radical methods will have to be used to meet it. The Plan is a key driver for the reduction of vehicle miles and should adopt some radical approaches if it is to contribute to significant vehicle mileage reduction during the plan period. The “Commuting: Why no Strategy” attachment suggests the radical approach of a strategy to reduce total commuting miles with three priorities.</p> <p>Effectiveness: The plan, as a whole has a number of features that will contribute to reductions in vehicle miles but they are not sufficiently radical to deliver the substantial vehicle mile reductions during the plan period</p> <p>Duty to cooperate: Commuting is the main driver of the city’s air pollution. Census data reported in the attachment shows that half of those who commute to work in the city by car come from elsewhere making this a cross border issue that comes within the scope of the Duty to Cooperate and the associated Statements of Common Ground. In the attachment, cross border commuting is covered by the External Commuting Balance Priority. The Plan is not compliant with its Duty to Cooperate because it does not make any reference to cooperating with neighbouring authorities on reduction of air pollution in the city, commuting miles or any other radical means of reducing carbon emissions.</p>	-	https://files.smartsurvey.io/3/1/CGR52XMC/236364279_20966068_3223269.pdf
389	SevernNet	Section 10 Transport	p.141-150	-	-	-	-	Transport planning in Bristol has concentrated on the central area and on movement on radial roads. Accessibility between PAS and the main Bristol urban area, the rest of the city region and south Wales does not match the existing numbers of	-	https://files.smartsurvey.io/a/CCXBRS

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
								<p>people travelling to the area, especially by sustainable means of transport. Future growth in the area will add to these numbers.</p> <p>Measures have been provided within the PAS area for walking and cycling, including by SevernNet through the Ride and Stride scheme. However, strategic cycle accessibility is poor.</p> <p>Public transport accessibility is limited to the periphery of the area. Although stations at Avonmouth, St. Andrew's Road and Severn Beach can serve areas in both Bristol and South Gloucestershire, most businesses are remote from the stations. Some large individual businesses operate their own staff bus services, but penetration within the area by normal stage carriage services is poor.</p> <p>Recognising the inter-relationship between existing land uses, development and improvement to this accessibility should be one of the highest priorities for the planning of the PAS area.</p> <p>The transport elements of the draft Local Plan do not give details of specific schemes, nor the relationship between any such schemes and proposed allocations. Transport is dealt with by setting out principles, with details of specific measures to be included in other documents.</p> <p>Poor sustainable accessibility means a continuing over-reliance on the private car. Job opportunities for many in the city region for whom the types of employment in PAS would be suitable are not accessible, with recent surveys indicating that many jobs in PAS are now being filled by commuting by car from south Wales. This has adverse implications for each of the three NPPF over-arching objectives.</p>		6V/SevernNet Rep.pdf
492	CPRE Avon and Bristol	Section 10 Transport	P.141	Unsure	Positively prepared	-	-	-	CHAPTER 10 Transport Para 10.2. CPRE Avon and Bristol notes that para 10.2 acknowledges that the growth in population, housing, and jobs will result in increased demand on an already congested transport network. It also highlights the vital need for Bristol's communities to be linked by a reliable public transport and active travel network that enables people to move around efficiently and with increased transport options that are accessible and inclusive for all. It would be helpful to clarify if 'Bristol's community' includes	-

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
									<p>those who travel into Bristol from the surrounding countryside. The level of development proposed, including in the Green Belt will only make these journey's more difficult for these residents who given the greater distances may be less likely to utilize active travel alternatives. Although CPRE has ongoing concerns regarding the densities proposed in the Plan, we do recognise that increased densities will likely minimize the need for travel in private vehicles due to the closer proximity of jobs and services.</p>	

General comments by chapter – Section 10: Transport – Supporting representations

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Soundness	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Support for the plan	Supporting documents
188	North Somerset Council	Section 10 Transport	-	Yes	Positively prepared	Yes	Yes	The sub-regional Joint Local Transport Plan 4 (JLTP4) has informed transport policies in both the Bristol and North Somerset emerging plans. The JLTP4 was published in 2020 and will be refreshed in line with the latest policy context. No strategic issues or major transport schemes are proposed between Bristol and North Somerset although discussions have taken place around improved public transport infrastructure to the south of Bristol and to the airport.	https://files.smartsurvey.io/3/1/RCCMY06K/236257368_20966066_3236456.pdf
447	GLOUCESTERSHIRE COUNTY CRICKET CLUB	Section 10 Transport		-	-	-	-	<p>(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT)</p> <p>10.1 Chapter 10 details policies in respect of creating a transport network that supports the local economy, enhances the urban environment and contributes to a high-quality, safe and people-friendly places – including promoting growth around the public transport and active travel network.</p> <p>10.2 Gloucestershire CCC support the provisions of Chapter 10 and consider they are sound. It wishes to highlight the particular sustainable location of the County Ground, which is further supported by its existing proximity to existing (and proposed) transport corridors and routes.</p> <p>10.3 A particular consideration is investment being made to sustainable travel into the city centre being implemented as part of the MetroWest Phase 2 project and the re-introduction of passenger services along the Henbury Line. This includes a new rail station at Ashley Down which will provide an hourly service between Bristol Temple Meads (10 minutes travel time) and Filton Abbey Wood, increasing to half-hourly at peak periods. The station is due to open in 2024. The County Ground lies within a 15 minute walk / 5 minute cycle of this new station, increasing its sustainability and furthering the potential to reduce the need for cars in any new development.</p>	https://files.smartsurvey.io/a/AUVQ5DGO/Gloucestershire CCC - Representations report.pdf https://files.smartsurvey.io/a/STOY6IME/Gloucestershire CCC - Part B.pdf

General comments by chapter – Section 12: Net zero and climate – Objections and proposed modifications

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
189	Elizabeth Blackwell Properties Ltd	Section 12 - policies NZC1-4	See comment	No	Consistent with national policy	No	No	<p>7.1. Chapter 12 of the plan sets out relevant policies for achieving net zero and addressing the Climate Emergency.</p> <p>7.2. While our client does not wish to comment in detail on each of the individual policies NZC1-NZC5, it does wish to direct the Council to the recent Written Ministerial Statement that clarified the role of local policies as it pertains to these issues.</p> <p>7.1. In doing so, whilst our client agrees with the need and desire to improve energy efficiency and carbon use it remains unclear why this should be done outside of the Building Regulations. There is no clear rationale for making Bristol City Council a 'special case'.</p> <p>7.2. Our client acknowledges that Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 outlines that development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.</p> <p>7.3. Similarly, the NPPF identifies plans should take a proactive approach to mitigating and adapting to climate change. However, the PPG (ID 6-012-20190315) refers to the Planning and Energy Act 2008, the Deregulation Act 2015, and the Written Ministerial Statement (March 2015). The 2015 WMS states that policies in relation to energy performance standards should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes.</p> <p>7.4. Part L of Building Regulations, as updated in 2021, identifies a requirement to achieve a 31% reduction in carbon emissions for new dwellings. Current Building Regulations, which took effect on 15 June 2022, therefore exceed Level 4 of the Code for Sustainable Homes. This therefore means the policy would directly conflict with both the PPG and the 2015 Ministerial Statement.</p> <p>7.5. Even where ignoring the above it can be observed that the Government's last response to the Future Homes Standard (FHS) consultation suggested that any policy should not be prescriptive on methodology and technology and that until there is an upgrade to the grid developers only need to demonstrate dwellings are Zero Carbon enabled.</p> <p>7.6. This position was further advanced by the recent Written Ministerial Statement, by the Housing Minister Lee Rowley on</p>	See above comment.	https://files.smartsurvey.io/a/TZ/DN1GZ0/P19-2214/Bristol/Local Plan Review Reg 19 Repts 23.01.24.pdf

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								<p>13th December 2024 (HLWS120), by making clear the Government’s expectations following the uplifts in the building regulations:</p> <p>“The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government’s commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:</p> <ul style="list-style-type: none"> • That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework. • The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).” <p>7.7. In the context of the above WMS it is considered that the Council’s approach is not sufficiently justified and contrary to national policy.</p>		
296	Bristol Temple Quarter Joint Delivery Team	Section 12 Net zero and climate all policies	Page 155	No	Consistent with national policy	Yes	Yes	<p>The Joint Delivery Team (JDT, please see Supporting Statement) support the principle of identifying sustainability measures at the Local Plan stage. This provides clarity to all those involved in delivery in Bristol, as well as allowing those policies to be examined, robustly justified and evidenced, to allow them to be considered in the balance of Local Plan objectives.</p> <p>The Local Plan was approved for consultation by Cabinet in early December 2023, ahead of the December Written Ministerial Statement (WMS) which clarified the extent to which local authorities are able to set energy efficiency standards ahead of building regulations.</p> <p>Given that Bristol have proposed an Energy Use Intensity (EUI) based target in Policy NZC2, instead of a Target Emission Rate (TER) based target which is required by the WMS, Policy NZC2 is</p>	<p>Given that Bristol was not able to consider the updated WMS, it was not able to consider its requirements and ensure Policies NZC1 – NZC5 were consistent with national policy. As a result, it is recommended that the policies are reviewed to align with the updated national government policy requirements. This will either align with the Future Homes Standard or provide an updated assessment of how each of the requirements are justified and robustly costed.</p>	<p>https://file.s.martsurvey.io/a/55FN5187/Bristol Local Plan Publication Version - Supporting Statement.pdf</p>

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								<p>unlikely to be found sound.</p> <p>The JDT supports the amendment of this policy to a TER basis in principle, ensuring consistency with building regulations, where the requirements are justified.</p> <p>It is also noted that the Policies NZC1 – NZC5, identify significant additional application stage information to be submitted for review. To ensure clarity for developers and an assessment if these requirements are justified, the associated monitoring framework should be updated to provide a clearer indication of what development will be supported.</p>		
300	McCarthy Stone	Section 12 - policies NZC1-4	NCS1, 2, 3 and 4	-	Consistent with national policy	-	-	<p>Policy NZC1: Climate change, sustainable design and construction Policy NZC2: Net zero carbon development – operational carbon Policy NZC3: Embodied carbon, materials and circular economy Policy NZC4: Adaptation to a changing climate</p> <p>Policies NZC1, NZC2, NZC3, and NZC4 identifies the requirements that development must be designed to in order to reach net zero by 2030. The policy / paragraph 12.1.10 also confirms that compliance can be demonstrated through for example various standards such as Passivhaus, home Quality Mark, LEED< AECB Carbonlite Programme and NABERS UK.</p> <p>Whilst the Council’s commitment to meeting both its and the UK Government’s target of net zero carbon emissions is commendable, it appears that the Council is going to achieve this through having mandatory carbon and climate standards from adoption of the plan that may go beyond government targets. However, it is our view that any requirement should be ‘stepped’ in line with Government targets and the proposed changes to the building regulations and the section amended substantially.</p> <p>This approach is confirmed within the Ministerial Statement (statement no : Statement UIN HCWS123 available from Written statements – Written questions, answers and statements – UK Parliament) released on 13th December 2023. The ministerial statement confirms, with respect to the net zero goal that:</p> <p>‘The improvement in standards already in force, alongside the</p>	<p>Recommendation The Council should re-consider the Policies NZC1, NZC2, NZC3, and NZC4 to ensure requirements are not going beyond government targets in line with the ministerial statement UIN HCWS123</p>	-

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								ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale' and 'To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one'		
303	David Gray	Section 12 - policies NZC1-4	Paragraph 12.1.1 on page 155	No	Effective	-	-	Effectiveness: Paragraph 21.1.1 does a good job of setting the scene for the need to reduce carbon emissions but the rest of the chapter neglects carbon emissions from commuting by car and the ability of the Plan to reduce it by bringing homes and workplaces closer together. An additional policy is required to correct this omission. Reduction of carbon emissions is the primary motivation for the attachment "Commuting: Why no Strategy", which introduces the elements of a strategy to reduce commuting-miles and points out that, reducing commuting miles supports the intentions of a number of other policies in the plan.	Additional Policy: Reduction of carbon emissions from commuting. "Proposals for development must include an assessment of the effect of the development on the balance between in-commuting to and out-commuting from the MSOA of the development. Proposals for development will not be permitted if they would increase already significant local net in-commuting or already significant local net out-commuting. Proposals for employment development may be exempt from this policy if 1) the employment application is not compatible with proximity to residential areas and b) the proposed location is in a northern coastal MSOA where there is already substantial employment that is not compatible with proximity to residential areas"	https://files.smartsurvey.io/3/1/CGR52XMC/236364279_20966068_3223269.pdf
396	Fusion Group	Section 12 Net zero and climate all policies	P.156-176	-	-	-	-	It is considered that the proposed sustainability policies are too onerous and will add an extra financial burden on developers which could conflict with other aspirations within the plan such as the need to provide affordable housing, mixed use and high-quality design.	-	https://files.smartsurvey.io/3/1/J5KLOVGO/236756759_20966126_3214383.pdf
409	Legal & General	Section 12 - policies NZC1-3	p.155-169; para 12.1.1-12.1.67	No	Justified	No	-	Both the NPPF (paragraph 34) and PPG (Paragraphs: 001 and 002 Reference ID: 10-001-20190509) make clear that:	It is recommended that these policies are accompanied by supporting text or an updated Supplementary Planning Document	https://files.smartsurvey.io

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								<p>Plans should set out the contributions expected from development.</p> <p>This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).</p> <p>These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.</p> <p>The costs and assumptions of the requirements of Policies NZC1, NZC2 and NZC3 (and all other policy requirements within the Local Plan) should be robustly scrutinised through the examination in public to ensure the cumulative cost of all relevant policies does not undermine the deliverability of development. Draft Policies NZC1, NZC2 and NZC3 require the submission of a Sustainability Statement as part of planning applications. To address the requirements of these policies, the Sustainability Statement is required to include an Energy Strategy setting out how the operational carbon targets of Policy NZC2 and the embodied carbon targets of Policy NZC3 will be met. It is recommended that these policies are accompanied by supporting text or an updated Supplementary Planning Document with advice on the level of detail expected to address policy requirements. For example, the selection of materials is rarely finalised at the planning application stage, with material detail typically secured by condition. Furthermore, it will not be possible to provide detailed embodied carbon and operational carbon assessments of built form as part of an outline/hybrid planning application. It is important that the supporting text to these policies and BCC's own Planning Application Requirements Local List recognises this.</p>	<p>with advice on the level of detail expected to address policy requirements. For example, the selection of materials is rarely finalised at the planning application stage, with material detail typically secured by condition. Furthermore, it will not be possible to provide detailed embodied carbon and operational carbon assessments of built form as part of an outline/hybrid planning application. It is important that the supporting text to these policies and BCC's own Planning Application Requirements Local List recognises this.</p>	<p>vey.io/3/1/M858M3B7/236870421_20966109_3293356.pdf</p>

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420	ESTEBAN INVESTMENTS LTD	Section 12 Net zero and climate all policies	PP155-176	No	Justified	-	-	<p>(REPRESENTATION SUBMITTED ON ALL POLICIES - NOT DIVISIBLE.)</p> <p>Policy is not justified, effective or consistent with national policy.</p> <p>The draft Local Plan proposes a number of significant changes in relation to policies relating to energy and sustainability.</p> <p>Esteban support the Council's work to achieve net zero. At Ashton Gate, Project Whitebeam is a joint effort across the sporting group to recognise, measure and mitigate our impact on the environment. Bears, City, Flyers, Ashton Gate and Bristol Sport are working together and the clubs have signed up to the UN Sport for Climate Action Framework with Race to Zero targets of halving our carbon footprint by 2030 and being net zero by 2040.</p> <p>A number of the proposed policy changes as drafted, however, could lead to significant financial implications for developers, the viability of schemes and the deliverability of the Plan.</p> <p>It is not clear that the implications of these policies have been sufficiently tested across the proposed allocations to ensure that they remain deliverable and the Plan remains justified and effective.</p>	-	https://files.smartsurvey.io/a/B3J7EGM5/ESTEBAN INVESTMENTS LTD Part B NZC 1-5.pdf
426	Yara Capital	Section 12 Net zero and climate all policies	p.155-176	-	-	-	-	It is considered that the proposed sustainability policies are too onerous and will add an extra financial burden on developers which could conflict with other aspirations within the plan such as the need to provide affordable housing and high-quality design.	-	https://files.smartsurvey.io/3/1/2KENQPSA/237114968_20966066_3297251.pdf
437	Watkin Jones	Section 12 Net zero and climate all policies	P.156	No	Consistent with national policy	-	Yes	<p>(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT SEE ATTACHED)</p> <p>Whilst we do not provide comments on the individual policies and criteria set out within NZC1-NZC5, it will be important to ensure that the requirements of such policies do not adversely impact on the viability of developments to the extent they could result in non-policy compliant schemes (e.g. in terms of the delivery of affordable housing) or indeed impede the potential</p>	-	https://files.smartsurvey.io/a/TW7SO3YH/WJ Representation - 26 Jan 2024

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								<p>non-delivery of sites as a whole. Furthermore, regard should be given to the recent Written Ministerial Statement that clarified the role of local policies in relation to these issues. Whilst we are supportive of the desire to improve energy efficiency and carbon reduction, it is not clear why this should be done outside of the Building Regulations, and we note that no evidence is provided to support this approach. It is noted that development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. Similarly, the NPPF identifies plans should take a proactive approach to mitigating and adapting to climate change. However, the PPG (ID 6-012-20190315) refers to the Planning and Energy Act 2008, the Deregulation Act 2015, and the Written Ministerial Statement (March 2015). The 2015 WMS states that policies in relation to energy performance standards should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes. Part L of Building Regulations, as updated in 2021, identifies a requirement to achieve a 31% reduction in carbon emissions for new dwellings. Current Building Regulations, which took effect on 15 June 2022, therefore exceed Level 4 of the Code for Sustainable Homes. This therefore means the policy would directly conflict with both the PPG and the 2015 Ministerial Statement.</p> <p>REFERENCE NO. INTERNAL USE ONLY: CLICK OR TAP HERE TO ENTER TEXT.</p> <p>Even where ignoring the above, it can be observed that the Government's last response to the Future Homes Standard (FHS) consultation suggested that any policy should not be prescriptive on methodology and technology and that until there is an upgrade to the grid, developers only need to demonstrate dwellings are Zero Carbon enabled. This position was further advanced by the recent Written Ministerial Statement, by the Housing Minister Lee Rowley on 13th December 2023 (HLWS120), by making clear the Government's expectations following the uplifts in the building regulations: "The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy</p>		<p>(Appendices).pdf</p> <p>https://files.smartsurvey.io/a/U8ZZT3AS/WJ/Representation-26-Jan-2024-Redacted.pdf</p>

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								<p>efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures: That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework. The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP)." In the context of the above recent Written Ministerial Statement, it is considered that the Council's approach is not sufficiently justified and inconsistent with national policy.</p>		
439	South West Housing Association Planning Consortium	Section 12 - policies NZC1-4	PP.155-174	No	-	-	-	<p>(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT SEE ATTACHED) As was highlighted in our previous consultation response, the SWHAPC agrees that tackling issues such as the Climate Emergency and net zero development should be prioritised, rigid climate change policies have the potential to frustrate the delivery of affordable housing. The additional costs attributed with such policies can impact the viability of residential development schemes. The SWHAPC advises that climate change policies should not be rigid or overly onerous, allowing for flexibility to ensure that affordable delivery is not hindered. This importance was underlined in the December 2023 Written Ministerial Statement on energy efficiency and environmental standards, as it was suggested that local authorities should not be setting their own standards. Of note are the draft Policy targets in draft Policy NZC2 which are particularly challenging and may not be achievable. Considering this, the draft net zero and carbon policies (alongside others in the emerging Local Plan) should be grounded in evidence, and robustly viability tested to demonstrate that they are achievable.</p> <p>Draft Policies NZC2 and NZC3 enable energy offsetting where the net zero carbon/embodied carbon requirements cannot be met on-site. More specifically, failure to meet the relevant proposed embodied carbon targets set out in draft Policy NCZC3</p>	-	https://files.smartsurvey.io/3/1/170NJKR8/237182602_20966066_3297262.pdf

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								<p>means the applicant must fund renewable, low-carbon energy and energy efficiency schemes elsewhere in the city. We would like to highlight that given the amount of brownfield development that is likely to take place in Bristol, the requirement to make such financial contributions in this scenario will directly affect the costs of schemes and therefore potential affordable housing delivery. This being said, as landlords of a significant number of properties across the city, there is an opportunity for SWHAPC members to play a role, for example, in retrofitting existing properties. As such the policies on off-setting should be flexible to encompass projects across the city.</p> <p>Draft Policy NZC3 states that major development will be required to undertake an embodied carbon assessment to demonstrate that proposals meet the embodied carbon targets set out in draft Policy NZC3. It is not clear how these embodied carbon targets have been derived, therefore the SWHAPC would like to request information from the Council on how the embodied carbon targets have been deduced. In addition, the SWHAPC would also like to understand how meeting these targets will be balanced against the wider sustainability issues at play in delivering new housing in Bristol, particularly affordable housing delivery.</p> <p>In respect of draft Policy NZC4, applicants are required to provide an adaptation strategy to illustrate how the issues in the main body of draft Policy NZC4 will be met. It would be beneficial for both the applicants and the Council if the Council could prepare a draft adaptation strategy to give applicants a steer on what the Council will accept.</p> <p>Finally, the draft net zero and carbon policies should be carefully considered against Building Regulations and the Future Homes Standard which is being introduced from 2025 to avoid duplication and any potential inconsistencies. With the introduction of Building Regulations Part O (overheating), parts of draft Policy NZC4 overlap with statutory requirement and is therefore unnecessary.</p>		
441	Orangestar Capital (Globe Bristol) Ltd	Section 12 Net zero and climate all policies	P.155-176	-	-	-	-	It is considered that the proposed sustainability policies are too onerous and will add an extra financial burden on developers which could conflict with other aspirations within the plan such as the need to provide affordable housing and high-quality design.	-	https://files.smarturvey.io/3/1/XNYF02Z0/237205187_20966066

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										3214097.pdf
447	GLOUCESTER SHIRE COUNTY CRICKET CLUB	Section 12 Net zero and climate all policies	-	-	-	-	-	<p>(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT - PLEASE SEE ATTACHED)</p> <p>9.1 Chapter 12 details policies intended to ensure that future development contributes towards the goals of the Council's One Climate Strategy, published in 2018, which sets the ambition of becoming a carbon neutral and climate resilient city by 2030.</p> <p>9.2 Gloucestershire CCC acknowledges the Council should support strategies which seek to mitigate against climate change. Gloucestershire CCC itself is committed to, through its operations and endeavours, incorporating measures to deliver social and economic sustainability benefits whilst also protecting and enhancing the environmental where possible – including the mitigating and adapting against the effects of climate change. The Council should, however, recognise the limited influence of a Local Plan on such matters, particularly with the need to reduce carbon dependence accepted and being addressed by Government.</p> <p>9.3 To meet the Government's aim of net zero emissions by 2050 that there is a need to improve the environmental performance of new residential (but also non-residential) forms of construction. To reach these targets, there is clear benefit in standardising an approach to sustainable design and construction across the UK as part of a collective approach.</p> <p>9.4 Paragraph 152 of the NPPF sets out the policy aim of transitioning to a low carbon future. To meet the 2050 national target, new homes are already being built to higher energy efficiency standards set out in the 2021 Building Regulations which will deliver a 30% improvement on previous regulations.</p> <p>9.5 Further amendments to Building Regulations and the new Future Homes Standard are anticipated to be implemented from 2025. These proposed changes will see new homes being built to standards that reduce CO2 emissions by 75% on current standards from 2025 onwards. Furthermore, homes built under the Future Homes Standard will be 'zero carbon ready', which means that in the longer-term, no further retrofit work for</p>	-	<p>https://file.ssmartsurvey.io/a/AUVQ5DGO/Gloucestershire CCC - Representations report.pdf</p> <p>https://file.ssmartsurvey.io/a/STOY6IME/Gloucestershire CCC - Part B.pdf</p>

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								<p>energy efficiency will be necessary to enable them to become zero carbon homes as the electricity grid continues to decarbonise.</p> <p>9.6 The Council will need to reflect on the role that Building Regulations play in the delivery of new development, and whilst national policy does not prevent local authorities from setting higher ambitions, the Plan is still required to demonstrate that its chosen strategy is deliverable and strikes the appropriate balance of social, economic and environmental factors in the aim of achieving sustainable development.</p> <p>9.7 Any deviation from national requirements should have been carefully and robustly considered in terms of its viability. Gloucestershire CCC particularly considers this in respect of the Council's provisions in respect of embodied carbon. Whilst supporting the principle, this may be impossible in the existing layouts of some sites. This will need to be balanced against the opportunity of development (including its social and economic benefits) as part of the planning balance.</p>		
458	AEW UK Investment Management	Section 12 Net zero and climate all policies	-	No	-	-	-	<p>(REPRESENTATIONS SUBMITTED IN NON STANDARD FORMAT SEE ATTACHED) 1.1 Draft policies NZC1 – NZC5 include prescriptive sustainability and net zero policies. With regards to these draft policies, we fully support BCC's intention to ensure that Local Plan policies require new development to be in line with sustainable development principles. However, we consider that the wording this needs to be reconsidered and is far too prescriptive in its current form. As currently written the regulations and specification contained within the policy wording duplicates policies already contained in national building regulations guidelines. This is something Local Plans are meant to avoid doing, as this creates an unnecessary additional layer of policy, which can also quickly become out of date when national building regulations are updated. The national Future Homes Standard and Future Buildings Standard sets the national policy framework for sustainability and provides the planning policy mechanism for this, and does not need to be duplicated by local planning policy.</p> <p>1.2 As currently worded these four sustainability policies proposed by the Local Plan are not necessary and therefore are not effective or deliverable over the Plan period, and are therefore unsound. A more effective approach would be for the</p>	-	https://files.smartsurvey.io/a/J8ZG1PRA/AEW REP REDACTED.pdf

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								climate change and energy Local Plan policies to direct the reader to national building regulations, and the Future Homes Standard and Future Buildings Standard, or equivalent.		
461	Sovereign Network Group	Section 12 - policies NZC1-4	-	No	Justified, effective, consistent with national policy	Yes	Yes	<p>(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT - PLEASE SEE ATTACHED)</p> <p>POLICY IS NOT JUSTIFIED, EFFECTIVE OR CONSISTENT WITH NATIONAL POLICY</p> <p>1. The draft policies NZC1 (climate change, sustainable design and construction) to NZC4 (adaption to a changing climate) within Section 12 of the emerging local plan seek to establish a series of minimum standards for new residential and non-residential buildings relating to embodied carbon, fabric efficiency in new buildings and the generation of on-site renewable energy. Whilst we acknowledge the desire to establish ambitious targets for future development, for the reasons explained below, we do not consider the proposed policy approach to be consistent with national policy and, therefore, sound.</p> <p>2. In support of this representation, SNG appointed sustainability consultants AES to provide a technical assessment of the draft policies. As set out within the document at Appendix 1, there are significant technical concerns with regards to these policies.</p> <p>3. The plan was published for consultation in November 2023. It understandably sought to respond to the national policy environment at the time of its production. Since then, however, on 13 December 2023, there was a Written Ministerial Statement (WMS) by the Minister of State for Housing, Lee Rowley, which directly addresses policies such as those contained within Section 12. The WMS includes a number of statements which are pertinent to the soundness of the draft policies [emphasis added]:</p> <p>a) "The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations.</p> <p>b) Any planning policies that propose local energy efficiency</p>	-	https://file.ssmartsurvey.io/a/AODG3HUI/Section12-SNG.pdf

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								<p>standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:</p> <ul style="list-style-type: none"> • That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework. • The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP). <p>c) Where plan policies go beyond current or planned building regulations, those policies should be applied flexibly to decisions on planning applications and appeals where the applicant can demonstrate that meeting the higher standards is not technically feasible, in relation to the availability of appropriate local energy infrastructure (for example adequate existing and planned grid connections) and access to adequate supply chains.</p> <p>d) To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one”.</p> <p>4. It is clear from the WMS that the Government considers the Building Regulations to be the preferred and primary mechanism to deliver improvements in energy efficiency and reduce the carbon emissions from development. There are a number of reasons why such an approach is supported and considered to be appropriate and sound.</p> <p>5. First, there is a logical cut off point between the two statutory regimes which it is helpful to remain separate. Planning is concerned with matters such as the location, form and design of new development, and Building Regulations controls matters of detailed design and construction such as building fabric, fire safety, access etc. These two statutory regimes are both equally important but have necessarily separate application and approval processes which reflect the stage at which they are applied to development and the knowledge of building form and fabric which is available at each stage. There is a good logic to maintaining a clear separation between these two regimes.</p> <p>6. Planning has an extremely important role to play in reducing carbon emissions and tackling the climate emergency but it should seek to achieve this through policies which direct and</p>		

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								<p>'plan' for development in a sustainable manner; it should not seek to stray into territory which is better achieved through nationally prescribed building regulations.</p> <p>7. According to Government published statistics from 2021, the largest contributor to greenhouse gas emissions in the UK is transport. Indeed, the movement of people and goods accounts for approximately 26% of emissions, considerably more than residential emissions which account for 16%¹. The plan-making process therefore has an extremely important role to play in addressing BCC's declared climate emergency without stepping into and duplicating policy areas which are better addressed at the Building Regulations stage of the development process.</p> <p>8. Second, as expressed at (c) above, the Government has strategic (i.e. beyond local authority level) concerns over the capacity of the current grid to accommodate additional local energy infrastructure and the availability of supply chains to meet the need for new building technologies that are required to achieve tightening standards. The former is a particular concern for a policy approach such as that proposed by BCC.</p> <p>9. Draft Policy NZC2 proposes that development will be expected to "Maximise on-site renewable energy generation to achieve a net zero energy balance." In order to meet this target it is inevitable that off-plot renewable energy will be required as very few buildings have sufficient roof space to accommodate PV panels which would meet the buildings operational energy demands. Any renewable energy generated which is not provided within a building's demise would need to have a connection to the grid. This results in a number of complications over ownership of the energy infrastructure, the establishment of energy supply companies, grid connections etc which are highly likely to preclude the technical and financial viability of achieving the draft policy requirement.</p> <p>10.Third, it is important to consider the policy in the context of the changing national requirements emerging through Buildings Regulations. Around the time the Local Plan is expected to be adopted in 2025, new, more stringent, Building Regulations will be in place. This will necessitate all new homes to achieve the Future Homes Standard and be net zero ready. Then in 2030, the Government is committed to having decarbonised the grid. Only five years into the plan period, the new homes built to Building Regulations at the start of the plan period would therefore be net neutral irrespective of the local plan policies.</p> <p>11.With specific regard to draft Policy NZC3, the prioritisation of</p>		

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								<p>renovation and retrofit of existing structures must not be considered an absolute requirement and reasonable endeavours must be applied. Depending on the building, its historic use and condition, retrofit and renovation may not be a viable option to achieve Net Zero Ready or True Net Zero especially with fabric efficiency and thermal bridging. Part L and the Future Homes Standard will align change of use buildings to the new Building Regulations therefore it is considered a forced retrofit/regeneration may comply with NZ3 but fail building regulations.</p> <p>12.SNG note the Whole Life Carbon values within the draft LP for 4 storey residential buildings are taken directly from the RIBA Challenge for 2030. Imposing a target that is 5 years in the future, where the data sets to assess CO2e are immature, will create compliance issues.</p> <p>13.BCC have not confirmed through scientific evaluation whether the embodied carbon targets for 4 storey buildings (<400kgCO2e) are achievable. SNG's own analysis and research indicates that 3 storey housing values are better aligned with the 2025 RIBA value of 800kgCO2e/m2 which is also considered a sensible benchmark elsewhere, such as within Wiltshire's draft Local Plan.</p> <p>14.Residential buildings of 5 or more storeys storey and over are primarily frame construction (whether steel or concrete) therefore having an inherent level of embodied carbon. An increased target of only 100kg to <500kg is not considered achievable or practical.</p> <p>15.SNG recommend that targeted analysis of CO2e targets should be reviewed and placed at a level sensible for industry to achieve in order to enable the effective implementation of this policy.</p> <p>Conclusion</p> <p>16.The emerging approach is considered to be unsound - it is plainly not consistent with national policy as the requirements of the policy are not expressed as a percentage uplift from the TER as now required by the WMS. This is not a criticism of the authority as there is no way that it would have known the change in national policy was to be published during the consultation period, however, now that it has it is necessary for the plan to be modified in order that it is made sound.</p> <p>17.The next logical question is whether, in light of the WMS, there is merit in including these policies within the Local Plan or instead relying upon Building Regulations. For the reasons set</p>		

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								out above, it is considered that there are good reasons to delete draft policies NZC1, NZC2, NZC3 and NZC4 rather than modify them. The Local Plan can then focus on ensuring development is directed towards sustainable locations (a matter covered in more detail in other representations) and leave the Building Regulations regime to control the detailed standards for building fabric and energy generation. Such an approach would be entirely consistent with the Government's expectation for the plan-making process.		
478	AEW REAL ESTATE INVESTMENT TRUST; CBRE IM; CENTRICA COMBINED INVESTMENT FUND C/O LASALLE INVESTMENT MANAGEMENT; TAYLOR WIMPEY	Section 12 - policies NZC1-4	PP.155-174	No	Justified, effective or consistent with national policy	Yes	Yes	<p>(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT - PLEASE SEE ATTACHED)</p> <p>POLICY IS NOT JUSTIFIED, EFFECTIVE OR CONSISTENT WITH NATIONAL POLICY</p> <p>1. The draft policies NZC1 (climate change, sustainable design and construction) to NZC4 (adaption to a changing climate) within Section 12 of the emerging local plan seek to establish a series of minimum standards for new residential and non-residential buildings relating to embodied carbon, fabric efficiency in new buildings and the generation of on-site renewable energy. Whilst we acknowledge the desire to establish ambitious targets for future development, for the reasons explained below, we do not consider the proposed policy approach to be consistent with national policy and, therefore, sound.</p> <p>2. The plan was published for consultation in November 2023. It understandably sought to respond to the national policy environment at the time of its production. Since then, however, on 13 December 2023, there was a Written Ministerial Statement (WMS) by the Minister of State for Housing, Lee Rowley, which directly addresses policies such as those contained within Section 12. The WMS includes a number of statements which are pertinent to the soundness of the draft policies [Savills emphasis]:</p> <p>a) "The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations.</p>	<p>(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT - PLEASE SEE ATTACHED FOR DETAILS OF PROPOSED AMENDMENTS)</p> <p>For the reasons set out above, it is considered that there are good reasons to delete draft policies NZC1, NZC2, NZC3 and NZC4 rather than modify them. The Local Plan can then focus on ensuring development is directed towards sustainable locations (a matter covered in more detail in other representations) and leave the Building Regulations regime to control the detailed standards for building fabric and energy generation. Such an approach would be entirely consistent with the Government's expectation for the plan-making process.</p>	https://file.ssmartsurvey.io/a/28D64XJ2/Section 12 - AEW CBRE CNA TW.pdf

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								<p>b) Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:</p> <ul style="list-style-type: none"> • That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework. • The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP). <p>c) Where plan policies go beyond current or planned building regulations, those policies should be applied flexibly to decisions on planning applications and appeals where the applicant can demonstrate that meeting the higher standards is not technically feasible, in relation to the availability of appropriate local energy infrastructure (for example adequate existing and planned grid connections) and access to adequate supply chains.</p> <p>d) To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one”.</p> <p>3. It is clear from the WMS that the Government considers the Building Regulations to be the preferred and primary mechanism to deliver improvements in energy efficiency and reduce the carbon emissions from development. There are a number of reasons why such an approach is supported and considered to be appropriate and sound.</p> <p>4. First, there is a logical cut off point between the two statutory regimes which it is helpful to remain separate. Planning is concerned with matters such as the location, form and design of new development, and Building Regulations controls matters of detailed design and construction such as building fabric, fire safety, access etc. These two statutory regimes are both equally important but have necessarily separate application and approval processes which reflect the stage at which they are applied to development and the knowledge of building form and fabric which is available at each stage. There is a good logic to maintaining a clear separation between these two regimes.</p> <p>5. Planning has an extremely important role to play in reducing carbon emissions and tackling the climate emergency but it</p>		

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								<p>should seek to achieve this through policies which direct and 'plan' for development in a sustainable manner; it should not seek to stray into territory which is better achieved through nationally prescribed building regulations.</p> <p>6. According to Government published statistics from 2021, the largest contributor to greenhouse gas emissions in the UK is transport. Indeed, the movement of people and goods accounts for approximately 26% of emissions, considerably more than residential emissions which account for 16%¹. The plan-making process therefore has an extremely important role to play in addressing BCC's declared climate emergency without stepping into and duplicating policy areas which are better addressed at the Building Regulations stage of the development process.</p> <p>7. Second, as expressed at (c) above, the Government has strategic (i.e. beyond local authority level) concerns over the capacity of the current grid to accommodate additional local energy infrastructure and the availability of supply chains to meet the need for new building technologies that are required to achieve tightening standards. The former is a particular concern for a policy approach such as that proposed by BCC.</p> <p>8. Draft Policy NZC2 proposes that development will be expected to "Maximise on-site renewable energy generation to achieve a net zero energy balance." In order to meet this target it is inevitable that off-plot renewable energy will be required as very few buildings have sufficient roof space to accommodate PV panels which would meet the buildings operational energy demands. Any renewable energy generated which is not provided within a building's demise would need to have a connection to the grid. This results in a number of complications over ownership of the energy infrastructure, the establishment of energy supply companies, grid connections etc which are highly likely to preclude the technical and financial viability of achieving the draft policy requirement.</p> <p>9. Third, it is important to consider the policy in the context of the changing national requirements emerging through Buildings Regulations. Around the time the Local Plan is expected to be adopted in 2025, new, more stringent, Building Regulations will be in place. This will necessitate all new homes to achieve the Future Homes Standard and be net zero ready. Then in 2030, the Government is committed to having decarbonised the grid. Only five years into the plan period, the new homes built to Building Regulations at the start of the plan period would therefore be net neutral irrespective of the local plan policies.</p>		

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								<p>Conclusion</p> <p>10. The emerging approach is considered to be unsound - it is plainly not consistent with national policy as the requirements of the policy are not expressed as a percentage uplift from the TER as now required by the WMS. This is not a criticism of the authority as there is no way that it would have known the change in national policy was to be published during the consultation period, however, now that it has it is necessary for the plan to be modified in order that it is made sound.</p> <p>11. The next logical question is whether, in light of the WMS, there is merit in including these policies within the Local Plan or instead relying upon Building Regulations. For the reasons set out above, it is considered that there are good reasons to delete draft policies NZC1, NZC2, NZC3 and NZC4 rather than modify them. The Local Plan can then focus on ensuring development is directed towards sustainable locations (a matter covered in more detail in other representations) and leave the Building Regulations regime to control the detailed standards for building fabric and energy generation. Such an approach would be entirely consistent with the Government's expectation for the plan-making process.</p> <p>1 https://www.gov.uk/government/statistics/final-uk-greenhouse-gas-emissions-national-statistics-1990-to-2021</p>		
491	Argo Real Estate Management Ltd	Section 12 Net zero and climate all policies	P.156	No	Positively prepared, justified, effective, consistent with national policy	Unsure	Unsure	<p>Policy is not positively prepared, justified, effective or consistent with national policy</p> <p>It is considered that the proposed sustainability policies are also too onerous and will add an extra financial burden on developers which could conflict with other aspirations within the plan such as the need to provide affordable housing and high-quality design.</p>	(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT - PLEASE SEE ATTACHED)	https://files.smartsurvey.io/3/1/OHCUUAWD/237878943_20966066_3299562.pdf

General comments by chapter – Section 12: Net zero and climate – Supporting representations

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Soundness	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Support for the plan	Supporting documents
190	FISHPONDS COMMUNITY PLANNING GROUP	Section 12 - policies NZC1-4	P.163	-	-	Unsure	Unsure	(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT SEE ATTACHED) Fishponds Community Planning Group recognises the importance of these issues and supports sustainable development and Bristol's approach and actions towards net zero. However, as a newly formed group, do not have the expertise to comment on these policies.	https://files.smartsurvey.io/3/1/XTGYDNWJ/236270759_20966066_3293960.pdf

General comments by chapter – Section 13: Design and Conservation – Objections and proposed modifications

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
489	Natural England	Section 13 Design and conservation	p.181-193	-	-	-	-	-	We recommend making reference to the Natural England GI Planning and Design Guide within this section. This provides evidence based practical guidance on how to plan and design good green infrastructure for a range of functions and settings. We recommend the Design Guide is used to inform forthcoming local design guidance.	https://files.smartsurvey.io/a/H1CORE7W/NE Rep Letter.pdf

General comments by chapter – Section 14: Health, wellbeing and food sustainability – Objections and proposed modifications

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
489	Natural England	Section 14, subsection Food Sustainability	p.211-216	-	-	-	-	-	<p>We welcome that the plan has identified the links between food growing spaces and health and wellbeing of communities and well as the environment, protects allotments, and required food growing space to be provided in new developments. Food growing spaces can connect habitats and support nature recovery through provision of biodiverse habitats. These spaces also provide an opportunity to integrate SuDS features and mitigate the urban heat island effect. Policy FS2: Provision of food growing space in new developments could include a requirement for food growing space as part of development to be designed to take all opportunities to connect to and enhance ecological networks and maximise opportunities for climate adaptation.</p>	<p>https://files.smartsurvey.io/a/H1CORE7W/NE Rep Letter.pdf</p>

General comments by chapter – Section 14: Health, wellbeing and food sustainability – Supporting representations

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Soundness	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Support for the plan	Supporting documents
250	University Hospitals Bristol and Weston NHS Foundation Trust	Section 14 Health, wellbeing and food sustainability	Paragraphs 14.1.1-14.1.2, page 199	Yes	-	Yes	Yes	UHBW welcomes the Council’s commitment to improving health and wellbeing in Bristol, identifying developing a healthy place as a core priority in creating a ‘city that supports citizen’s mental and physical health and wellbeing, and aiming to reduce health inequalities across the city.	https://files.smartsurvey.io/a/3HCVJTO2/UHBW - Final BLP Reps - 25.1.24.pdf

General comments by chapter – Section 15: Utilities and minerals – Supporting representations

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Soundness	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Support for the plan	Supporting documents
190	FISHPONDS COMMUNITY PLANNING GROUP	Section 15 Utilities and Minerals	P.217-220	-	-	Unsure	Unsure	(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT SEE ATTACHED) Fishponds Community Planning Group recognises the importance of these issues, including the impact of major developments on sewage and drainage. However, as a newly formed group, do not have the expertise to comment on this policy.	https://files.smartsurvey.io/3/1/XTGYDNWJ/236270759_20966066_3293960.pdf

Duty to Cooperate – Objections and proposed modifications

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
450	PERSIMMON HOMES SEVERN VALLEY	Duty to cooperate	para 6.8	No	Positively prepared, justified, effective, consistent with national policy.	No	No	<p>Plan is not positively prepared, justified, effective or consistent with national policy.</p> <p>The Company objects to Bristol City Council's current approach to the Duty to Cooperate. As it stands, the Duty to Cooperate has not been met and the Plan therefore fails the tests of soundness, namely NPP para 35a.</p> <p>If Bristol City Council is to proceed with a housing requirement of 1,925 dwellings per annum then there will be an unmet housing need of 10,404 dwellings over the Plan Period. The Council must therefore make serious efforts to ensure that the unmet need is met by the neighbouring authorities; North Somerset, South Gloucestershire and Bath & North East Somerset. Given the scale of the unmet need, it is not sufficient to simply write to each local authority and ask that they assist in meeting the unmet need if possible. The Council must instead be proactive in ensuring that the emerging Local Plans of those LPAs are based on accurate assessments of their capacities to accommodate the unmet need.</p> <p>North Somerset Council have recently consulted on a Regulation 19 Local Plan which does not meet its objectively assessed housing need, with a shortfall of 5,633. No sound justification was provided to support this planned under-delivery. It is imperative that Bristol City Council participate at the examination of that Plan due to this. If North Somerset proceed with a Plan that under-delivers against its actual need housing need, the impact on housing market pressures and affordability in the wider Bristol area will only worsen. Hence it is important that before North Somerset can accommodate any of Bristol's unmet need, it must first plan for its own housing need in full. Due to the fundamental connectivity between the two Plans, Bristol should support the case for North Somerset increasing its proposed Plan Period housing supply at the North Somerset Local</p>	<p>It is requested that Bristol City Council:</p> <ul style="list-style-type: none"> • agree an approach to meeting unmet housing needs with South Gloucestershire, North Somerset and Bath & North East Somerset. • robustly engage with the Local Plan processes of the neighbouring local planning authorities, to ensure their assessments of their abilities to meet the unmet housing need are accurate and positively prepared. • seek to maximise the amount of low density housing that the neighbouring local planning authorities can deliver, based on Bristol's under-delivery of that type of housing. 	-

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
								<p>Plan examination. Failure to do so will mean that North Somerset cannot contribute to Bristol's unmet need over the Plan Period.</p> <p>South Gloucestershire Council are currently consulting on their Regulation 18 Local Plan, which, while it meets its own housing need, has to yet to consider its potential for meeting Bristol's unmet need. Bristol City Council should take a proactive approach and engage with South Gloucestershire Council's Local Plan process to ensure that their assessment of available sites for residential allocation is robust and reflective of South Gloucestershire's actual ability to accommodate a share of the unmet need.</p> <p>Moreover, it will not be appropriate for Bristol City Council to only consider what quantum of unmet need can be met in the neighbouring LPAs. The emerging allocations in the draft Local Plan comprise mostly high density, multi-storey apartments. There is therefore a significant unmet need for housing appropriate for families, including semi-detached and terraced housing. When Bristol City Council collaborate with the neighbouring authorities, they should consider how much of that family-style housing can be accommodated, not just the total number of dwellings. The Duty to Cooperate has not been met, which calls into question the soundness of the draft Local Plan. As per para 27 of the NPPF, local planning authorities should document the progress in their cooperation to address cross-boundary issues. The evidence base paper Planning for strategic cross boundary matters: Progress report (November 2023) does not detail an agreed approach to meeting the unmet need. Instead, it provides a template letter used to approach the neighbouring LPAs with, which is not sufficient on its own.</p> <p>The West of England has routinely struggled with cross-boundary strategic planning, as evidenced by the collapse of the Joint Spatial Plan and the WECA Spatial Development Strategy. Although those have fallen away, it does not mean that the constituent</p>		

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								local planning authorities can act individually and not account for Bristol's unmet need, given their interconnectedness through the Bristol Housing Market Area.		

Infrastructure Delivery Plan – Objections and proposed modifications

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Falls test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
473	National Highways	Infrastructure Delivery Plan	P.61	No	Justified, effective.	-	-	(REPRESENTATION SUBMITTED IN NON STANDARD FORMAT SEE ATTACHED)	<p>Infrastructure Delivery Plan (IDP) Draft – September 2023</p> <p>Paragraph 1.1 of this document advises that it covers a period until 2036 which is inconsistent with the Local Plan period that runs until 2040. Clarification is requested on this point. In addition, we seek clarity on the proposed years for assessment within the forthcoming strategic highway assessment using WERTM and what infrastructure from the IDP that has been included/omitted.</p> <p>IDP Appendix B sets out the currently proposed infrastructure schedule, including road schemes, although it is unclear how the need for or scope of these schemes has been identified in the absence of a strategic transport evidence base. The need for any SRN improvements to accommodate the impact of the Plan has not yet been determined so no schemes on the SRN are currently included with the IDP.</p> <p>Should the need for mitigation on the SRN be identified, then concept scheme designs, cost estimates and funding arrangements will need to be progressed to inform viability and deliverability. Any SRN mitigation will need to be set out within the IDP and signposted within relevant Local Plan policies. The IDP should also set out how the delivery of development will be managed to ensure that essential infrastructure, services and other investment will be delivered in a timely manner to prevent an unacceptable safety impact on the SRN.</p> <p>Given the target date for Examination we request that BCC consult National Highways to agree the scope of the transport evidence base and undertake the necessary assessment to identify any mitigation required to safely accommodate planned growth. This is necessary to ensure that the Local Plan can be found 'justified' and 'effective' as per NPPF paragraph 35 at Examination.</p>	https://files.smartsurvey.io/3/1/W2G2JYFS/237463260_20966066_3291744.pdf

General comments – Objections and proposed modifications

ID No.	Respondent	Policy/proposal	Page/paragraph reference	Is the plan/policy sound	Fails test(s) of soundness	Is legally compliant	Meets duty to cooperate	Plan/policy is not sound because:	Proposed modifications:	Supporting documents
2	judith irene brown	General comment	-	-	-	-	-	I wish to express my disappointment that nowhere in this document is the phrase 'Age Friendly City', Following the Lottery grant of 5.9 million pounds into Bristol, achieved by a consortium of AgeUKBristol, Bristol Older Peoples Forum, Aardman Animations , we worked to establish becoming an age friendly city, supported by the first elected Mayor George Ferguson and nominally at least y the current Mayor.	-	-
2	judith irene brown	General comment	-	Unsure	-	Unsure	Unsure	When Intensive development is mentioned, there is no statement that all intensive development should be accompanied by compatible sewage/drainage, schools and health facilities. This should be set i stone! Where 'tall buildings are mentioned, they should only be built up to the level at which the local fire services can deal. I believe that they do not have machinery capable of reaching beyond a ten storey building. To build higher is to risk unnecessary deaths.	All plans to include details of provision of sewage/drainage/schools/surgeries	-
3	Shankari Raj	General comment Eastville Park	-	No	Positively prepared	Yes	No	-	Provide a community swimming pool	-
3	Shankari Raj	General comment Tree planting to Stonebridge Park, Eastville	-	Unsure	Effective	No	No	Planting trees to Stonebridge Park - Eastville	-	-
340	Bristol Conservation Advisory Panel	General comment	-	-	-	-	-	(SEE SUBSTANTIVE REPRESENTATION FOR FULL DETAILS) Sections 3-15 each require a plan for implementation and a system of review, involving the public, to measure their success over the period of the Plan. Too much of the language is conditional and open-ended. There needs to be an enforcement of existing standards on receipt of applications; resources need to be available to police un-consented works. The increasing use of retrospective applications and consents need to be discouraged as acceptable	-	https://files.smartsurvey.io/a/3R8CLE60/BRISTOL CONSERVATION ADVISORY PANEL - FULL REP.pdf

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								<p>procedures.</p> <p>We recommend establishing a dedicated heritage fund to support the restoration and maintenance of historic buildings, particularly those at risk and within the Council's ownership and care.</p> <p>Review the implementation of the energy saving measures proposed for adapting older homes for energy efficiency in the light of new HE and HMG recommendations. Publish new BCC guidance (as suggested in 12.1.9) for use in planning applications and promote this to applicants.</p> <p>Update and republish BCC's existing documents e.g. 'Traditional Windows: Guidance on their repair, upgrading and replacement' (2106) and 'Our Inherited City' to form part of a suite of guidance documents. Promote these to developers and homeowners as early advice.</p> <p>Instigate a review of the planning committee system and duration of appointments. Confidence in the system has declined and the balance is perceived as being too much on the side of developers with little influence from other interests and even Councillors e.g. community groups, heritage and natural environment, despite the stated importance of these in the Plan.</p>		
368	Nightwatch	General comment	OVERALL PLAN FEEDBACK	No	Positively prepared	Unsure	Unsure	<p>To Strategic City Planning Team, Bristol City Council</p> <p>Please find below the feedback to date from the Night Watch Board on the Local Plan review on both draft and retained policies.</p> <p>1 Inconsistent Terminology for Bristol's 24hr Economy. The local plan draft and retained policies has an inconsistency of use of terms which cover the Bristol's 24hrs economy; there needs to be a single clear definition of what defines Bristol's Nightlife and culture for a 24 hrs city to ensure its protection.</p>	<p>To Strategic City Planning Team, Bristol City Council</p> <p>Please find below the feedback to date from the Night Watch Board on the Local Plan review on both draft and retained policies.</p> <p>1 Inconsistent Terminology for Bristol's 24hr Economy. The local plan draft and retained policies has an inconsistency of use of terms which cover the Bristol's 24hrs economy; there needs to be a single clear definition of what defines Bristol's Nightlife and culture for a 24 hrs city to ensure its protection.</p>	<p>https://file.s.smartsurvey.io/3/1/RTEME22Q/236597962_20966066_3170979.pdf</p> <p>https://file.s.smartsurvey.io/3/1/VXT27FQI/</p>

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								<p>2 Developments near 24 hour Economy Development of all other use types (non 24 hour economy related) which affect the current red line plot of a 24 hour economy venue based on its existing planning permission and current or previous license should be treated as a total loss of a venue and should be refused based on any changes to existing venues plots effect its viability and current and future social value.</p> <p>This Statement is agreed and supported by Mark Davyd Ceo Music Venues Trust, Brendan Murphy Director Barbie Bristol, Leighton de Burca FIPM Chair of Night Watch Bristol and Annie Mcgann Chair of Save Bristol Nightlife.</p> <p>3 Definition of Culture In all policy there is a clash or inconsistency with the industry and the term "Cultural" we have seen many cases where this is the case but upon reading through all the policies so far this inconsistent approach is widespread and we need an overarching definition which enshrines in all policies that nightlife is "Cultural".</p> <p>4 Noise Acoustic and Noise Monitoring should be made mandatory at peak operating times when plans are submitted near venues and sites. As per Para 123 of the national planning policy Framework and Agent of change "Existing businesses should not have unreasonable restrictions placed on them because of changes in nearby land uses"</p> <p>4.1 Deed of easement areas should be set up around venues and event sites. As per Para 123 of the national planning policy Framework and Agent of change "Existing businesses should not have</p>	<p>2 Developments near 24 hour Economy Development of all other use types (non 24 hour economy related) which affect the current red line plot of a 24 hour economy venue based on its existing planning permission and current or previous license should be treated as a total loss of a venue and should be refused based on any changes to existing venues plots effect its viability and current and future social value.</p> <p>This Statement is agreed and supported by Mark Davyd Ceo Music Venues Trust, Brendan Murphy Director Barbie Bristol, Leighton de Burca FIPM Chair of Night Watch Bristol and Annie Mcgann Chair of Save Bristol Nightlife.</p> <p>3 Definition of Culture In all policy there is a clash or inconsistency with the industry and the term "Cultural" we have seen many cases where this is the case but upon reading through all the policies so far this inconsistent approach is widespread and we need an overarching definition which enshrines in all policies that nightlife is "Cultural".</p> <p>4 Noise Acoustic and Noise Monitoring should be made mandatory at peak operating times when plans are submitted near venues and sites. As per Para 123 of the national planning policy Framework and Agent of change "Existing businesses should not have unreasonable restrictions placed on them because of changes in nearby land uses"</p> <p>4.1 Deed of easement areas should be set up around venues and event sites. As per Para 123 of the national planning policy Framework and Agent of change "Existing businesses should not have unreasonable restrictions placed on them because of</p>	<p>236597962 20966066 3270071.pdf</p>

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								<p>unreasonable restrictions placed on them because of changes in nearby land uses"</p> <p>5 Site Allocation All venues and Sites (including Festival Sites) in the city need to be set out in the local plan using the site allocation process as is with all other uses. As per Para 23 of the national policy framework :- "Town centres management and growth; town centres at heart of communities; allocate sites in town centres for leisure, cultural, community uses."</p> <p>6 Protection of Employment Land Employment land protecting Retained Policy BCAP6: Delivery of employment space. Under the retained and draft policies and other policies employment land space does not list the huge impact of the 24 hr economy and only has office and retail as its focus. We need to ensure that nightlife venues and 24hr economy are listed as vital employment land uses as at present this is not clear. The night time economy land use has a higher impact per site than many other use classes using the same space and has a bigger impact on social mobility. As per para 161 in National Policy Framework "assess need for land/floorspace for economic activity including leisure" As in Para 9 and in the One City Plan "Making it easier for jobs to be created in cities; improving the conditions in which people live, work, travel and take leisure"</p> <p>7 Creation of Supplementary Planning Guidance for Bristol Culture and Nightlife. The supplementary planning document would provide guidance on implementing Bristol City Council and other agencies policies that have a bearing on Bristol's culture, the night time economy and the 24hr city.</p> <p>8 Set up of Local Partnership Bristol needs to set up a local partnership group</p>	<p>changes in nearby land uses"</p> <p>5 Site Allocation All venues and Sites (including Festival Sites) in the city need to be set out in the local plan using the site allocation process as is with all other uses. As per Para 23 of the national policy framework :- "Town centres management and growth; town centres at heart of communities; allocate sites in town centres for leisure, cultural, community uses."</p> <p>6 Protection of Employment Land Employment land protecting Retained Policy BCAP6: Delivery of employment space. Under the retained and draft policies and other policies employment land space does not list the huge impact of the 24 hr economy and only has office and retail as its focus. We need to ensure that nightlife venues and 24hr economy are listed as vital employment land uses as at present this is not clear. The night time economy land use has a higher impact per site than many other use classes using the same space and has a bigger impact on social mobility. As per para 161 in National Policy Framework "assess need for land/floorspace for economic activity including leisure" As in Para 9 and in the One City Plan "Making it easier for jobs to be created in cities; improving the conditions in which people live, work, travel and take leisure"</p> <p>7 Creation of Supplementary Planning Guidance for Bristol Culture and Nightlife. The supplementary planning document would provide guidance on implementing Bristol City Council and other agencies policies that have a bearing on Bristol's culture, the night time economy and the 24hr city.</p> <p>8 Set up of Local Partnership Bristol needs to set up a local partnership group which consists of Licencing, Planning, Regeneration, City Design Group, Culture, Site Permissions, Police, BIDs, Place and Industry. This partnership would be able to</p>	

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								<p>which consists of Licencing, Planning, Regeneration, City Design Group, Culture, Site Permissions, Police, BIDs, Place and Industry. This partnership would be able to go through the items listed and discuss ways in which issues in policy and practice can be changed to resolve the current clashes.</p> <p>9 Festival Site and event site provision Bristol is a city of festivals and events which put the city on the international map both culturally and economically, to ensure Bristol's future as a festival and culture capital we need to ensure open spaces are protected in policy for this very use. at present this is not the case and we need to ensure site allocations and reserved open spaces are listed for this purpose. As per Para 156 of the National Policy Framework "strategic policies in local plans to deliver leisure development and cultural infrastructure"</p> <p>10 Venue notification Policy should make it mandatory for developments within a set radius of any venue to be deemed neighbors and be under the neighbor notification scheme at all stages from pre application onwards. At present businesses are rarely notified of developments near their businesses.</p> <p>11 Linking up of policy and agencies All policy needs to be joined up when it has bearing on the 24hr economy, Festivals and Night Life at present we have Cumulative Impact Policy in Licencing which states certain conditions and we have in the draft policy 15.1 under pollution a planning term which would effect Cumulative impact. Yet many Town Centres and the industry in general rely on a cluster of cultural activities to be successful and this is where current policies have stalled or hampered growth in the sectors.</p> <p>The above is where we have managed to get feedback on the main issues so far but as previously stated nightlife has only recently been notified of such consultations in relation to giving industry</p>	<p>go through the items listed and discuss ways in which issues in policy and practice can be changed to resolve the current clashes.</p> <p>9 Festival Site and event site provision Bristol is a city of festivals and events which put the city on the international map both culturally and economically, to ensure Bristol's future as a festival and culture capital we need to ensure open spaces are protected in policy for this very use. at present this is not the case and we need to ensure site allocations and reserved open spaces are listed for this purpose. As per Para 156 of the National Policy Framework "strategic policies in local plans to deliver leisure development and cultural infrastructure"</p> <p>10 Venue notification Policy should make it mandatory for developments within a set radius of any venue to be deemed neighbors and be under the neighbor notification scheme at all stages from pre application onwards. At present businesses are rarely notified of developments near their businesses.</p> <p>11 Linking up of policy and agencies All policy needs to be joined up when it has bearing on the 24hr economy, Festivals and Night Life at present we have Cumulative Impact Policy in Licencing which states certain conditions and we have in the draft policy 15.1 under pollution a planning term which would effect Cumulative impact. Yet many Town Centres and the industry in general rely on a cluster of cultural activities to be successful and this is where current policies have stalled or hampered growth in the sectors.</p> <p>The above is where we have managed to get feedback on the main issues so far but as previously stated nightlife has only recently been notified of such consultations in relation to giving industry feedback this feedback will be expanded and refined over time while we work through current and future policies and its effects on Bristol's nightlife, culture and 24hr</p>	

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								<p>feedback this feedback will be expanded and refined over time while we work through current and future policies and its effects on Bristol's nightlife, culture and 24hr economy.</p> <p>Policy Specific detailed feedback</p> <p>2 Building a Better Bristol</p> <p>2.1 One of the main foundations for the Local Plan's "Vision of Building a better Bristol" is the One City Plan and its aim to include everyone to build on the economic success of the city, when referring to the aforementioned One City Plan there was little positive preparation of this plan for the Night Time Economy (£95 Billion per annum for the economy NTIA) as during its creation events did not have trade representatives in attendance at any stage thus making the One City Plan a foundation for effective and consistent planning for balanced, sustainable and livable communities questionable.</p> <p>2.7 "Secure diverse and vibrant centres across the city which help to deliver the goal of a 15-minute city" „ Protect our valued open spaces, promote food growing and increase the tree canopy to support a liveable, healthy city; „ Cherish the city's historic environment and harness the benefits of heritage sensitive regeneration;</p> <p>these aspiration has been called into question in recent months as the housing dominant focus of the planning strategy has been more and more night time economy and community facilities under threat</p>	<p>economy.</p> <p>Policy Specific detailed feedback</p> <p>2 Building a Better Bristol</p> <p>2.1 One of the main foundations for the Local Plan's "Vision of Building a better Bristol" is the One City Plan and its aim to include everyone to build on the economic success of the city, when referring to the aforementioned One City Plan there was little positive preparation of this plan for the Night Time Economy (£95 Billion per annum for the economy NTIA) as during its creation events did not have trade representatives in attendance at any stage thus making the One City Plan a foundation for effective and consistent planning for balanced, sustainable and livable communities questionable.</p> <p>2.7 "Secure diverse and vibrant centres across the city which help to deliver the goal of a 15-minute city" „ Protect our valued open spaces, promote food growing and increase the tree canopy to support a liveable, healthy city; „ Cherish the city's historic environment and harness the benefits of heritage sensitive regeneration;</p> <p>these aspiration has been called into question in recent months as the housing dominant focus of the planning strategy has been more and more night time economy and community facilities under threat or developed into housing thus losing vital venues " the Rhubarb Tavern" case is a prime example all policies and community and committee views pointed to</p>	

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								<p>or developed into housing thus losing vital venues “ the Rhubarb Tavern” case is a prime example all policies and community and committee views pointed to protect this Pub with its Garden yet the planning departments focus on homes above all else created inconsistency of approach. The outcome if it goes in line with the planning department's view would be loss of the only Pub in the whole area undoing the 15 minute livable neighborhood.</p> <p>3 Development Strategy These sections of the Development Strategy highlight the core objectives for this local plan is homes. For a city to be effectively planned it needs to focus on all aspects of regeneration and development and to have justified ,effective and consistent plans which do not create a situation of conflict between uses or where the existing night time economy is either forced out of business or the ground and buildings which house them are only considered viable for housing.</p>	<p>protect this Pub with its Garden yet the planning departments focus on homes above all else created inconsistency of approach. The outcome if it goes in line with the planning department's view would be loss of the only Pub in the whole area undoing the 15 minute livable neighborhood.</p> <p>3 Development Strategy These sections of the Development Strategy highlight the core objectives for this local plan is homes. For a city to be effectively planned it needs to focus on all aspects of regeneration and development and to have justified ,effective and consistent plans which do not create a situation of conflict between uses or where the existing night time economy is either forced out of business or the ground and buildings which house them are only considered viable for housing.</p>	

Overall Local Plan and Evidence Documents – Objections and proposed modifications

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448	Dominic Hogg	Overall Local Plan and Evidence Documents	-	-	-	-	-	<p>*PLEASE SEE DOCUMENT ATTACHED FOR SUBSTANTIVE COMMENT*</p> <p>Only in respect of identifying sites could this Plan be considered to be positively prepared, but even here, the risk of exposure of sites to the risk of flooding- highlighted in the SA - has only been partially dealt with (the Plan to address flood risk has no certainty of being of funded) and whilst there is an attempt to demonstrate that a sequential test has been applied through supporting evidence, we doubt that this can be satisfactorily demonstrated, not least given the lateness at which the evidence has emerged in the development of the Local Plan: both Level 1 and Level 2 SFRA Reports are dated 2023, and appear to focus not on the application of the test, but on the assumption that there are no alternatives to the sites allocated (so that the focus is on exception texts). It also seems highly questionable that the needs of the city in terms of commercial office space are underprovided where it is needed (see the JLL Employment Land Review, prepared for Bristol City Council, another document which provides 'supporting evidence', but comes rather late in the day – June 2023). Evidence, such as it has been provided, has come either rather late in the day, or is out of date. That partly reflects the chaotic gestation of this Local Plan.</p> <p>Many of the Plan's policies are not justified and not evidenced.</p> <p>As regards consistency with national policy, the Plan falls short in many key areas as mentioned above, notably in respect of the (related) inadequate emphasis on fostering quality design as perceived by local communities, climate change, biodiversity (managing land for nature), and waste. In short, the Plan is unsound for some very significant reasons. These are unlikely to be soluble without major revision.</p> <p>This is unfortunate. Bristol lacks an up to date Plan, and we believe that this situation has been allowed to persist so that the tilted balance can be invoked to give the green</p>	-	https://files.smartsurvey.io/a/Ux83UMCM/D Hogg Reps Report.pdf

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								<p>light to developments that have little public support, but which the political leadership in the City has been keen to see go forward, notwithstanding their limited sustainability credentials.</p> <p>All the more reason, then, for the Plan, at the strategic level, to be clear about what is or is not 'sustainable'. Indeed, for this very reason, a 'positively prepared' plan ought to address the issue as to what makes development 'sustainable' head on. The NPPF gives weight to this matter through its emphasis on design, a mater we consider further below.</p> <p>Assessment Against Overarching Principles of the NPPF Section 1: Introduction</p> <p>Para 2 of the National Planning Policy Framework (NPPF) states:</p> <p>The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements</p> <p>It goes on to state:</p> <p>3. The Framework should be read as a whole (including its footnotes and annexes). General references to planning policies in the Framework should be applied in a way that is appropriate to the type of plan being produced, taking into account policy on plan-making in chapter 3.</p> <p>4. The Framework should be read in conjunction with the Government's planning policy for traveller sites, and its planning policy for waste. When preparing plans or making decisions on applications for these types of development, regard should also be had to the policies in this Framework, where relevant.</p> <p>In our view, the Council's development plan has failed to properly take into account key matters addressed in the NPPF. It fails the tests of soundness (see below) in multiple</p>		

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								<p>ways. The Plan also fails to reflect relevant international obligations and statutory requirements.</p> <p>Assessment Against the NPPF's Section 3: Plan-making</p> <p>Vision</p> <p>As per para 15, up to date plans should</p> <p>provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings</p> <p>As we indicate below, the vision as set out in the Local Plan makes no sense, and the aims and objectives are in conflict, a matter which should have been identified in the SA, but was not. The vision is not.</p> <p>Plan Preparation.</p> <p>As per Para 16 of the NPPF, Plans should:</p> <ul style="list-style-type: none"> a) be prepared with the objective of contributing to the achievement of sustainable development⁹; b) be prepared positively, in a way that is aspirational but deliverable; c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees; d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals; e) be accessible through the use of digital tools to assist public involvement and policy presentation; and f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant). <p>Footnote 9 in the above extract makes reference to the legal requirement of Planning Authorities to 'exercise the function with the objective of contributing to the achievement of sustainable development'.¹ That includes</p>		

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								<p>having 'regard to the desirability of achieving good design'. Sustainable development has three overarching objectives, as per Para 8 of the NPPF, which are 'are interdependent and need to be pursued in mutually supportive ways.'</p> <p>These are (as per Para 8 of the NPPF):</p> <ul style="list-style-type: none"> a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. <p>9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.</p> <p>The Local Plan Objectives are a combination of a quantitative housing target (bit no quantitative target for affordable homes), alongside meaningless verbiage that highlights the narrowness of the focus of the Local Plan on economic and social objectives to the exclusion of</p>		

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								<p>environmental concerns. This is also reflected in the poor quality of the sustainability appraisal, which could have posed, but did not, a challenge in respect of the potential trade-offs across these objectives For example, how do policies DS10-12 help resolve the tension between 'Enabling delivery of at least 1,925 new homes a year in Bristol up to 2040 including affordable housing and homes to meet a range of needs' and the aim 'Protect our valued open spaces, promote food growing and increase the tree canopy to support a liveable, healthy city'? Would these not have been potential areas to manage positively for nature? How does the aim 'Actively respond to the climate and ecological emergencies whilst securing sustainable development' find itself reflected in the Objective for housing, given that NZC3 is permissive of a greater level of GHG emissions from taller buildings than smaller ones? How does the objective of 'Enabling delivery of at least 1,925 new homes a year in Bristol up to 2040 including affordable housing and homes to meet a range of needs' sit alongside</p> <p>1 Section 39(2) and (2a) of the Planning and Compulsory Purchase Act 2004.</p> <p>'Manage the development of student housing to safeguard existing communities whilst supporting thriving universities by meeting student accommodation needs'? There have been national level discussions around the potential tensions between accommodating a growing number of students from overseas and delivering housing: why is this not a relevant conversation for the Plan to engage in? Some of the most visually intrusive proposals for new development come in the form of purpose built student accommodation in the City Centre: how do such proposals sit with the aim to 'Cherish the city's historic environment and harness the benefits of heritage sensitive regeneration'? Is this what is intended by the aim to 'Take a plan-led approach to promoting areas with the potential to increase densities and make efficient use of under-used land; this includes transforming some areas of the city to create communities with new homes, workplaces and public open spaces'?</p>		

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								<p>The vision includes bizarre and completely unsubstantiated statements to the effect that, by 2030 'Bristol will have met its zero carbon reduction targets', yet by 2040, close to 20,000 additional homes will have been built after 2030. This would take place under a policy (NZC3) which allows embodied GHG emissions to be of the order of 500kgCO2/m2 before anyone has an incentive to reduce them. By all means, articulate an ambitious vision, but why make statements that are obviously inconsistent with the only quantitative Objective that sits under the Vision? At an average of (say) 70m2 per dwelling, the emissions related to building these 20,000 dwellings could amount to 700,000 tonnes CO2 over the decade. Consideration regarding how these emissions could have been lowered should have been considered either in respect of alternative policies under the SA, under alternative modes of delivering policies under the SA, thorough consideration of the evidence as regards NZC3, or in respect of challenging the perspective as regards Tall Buildings (DC2). That this issue was not tackled in the suggested manner is lamentable.</p> <p>If the Council's own declarations – of a climate emergency, and ecological emergency – were to be given any weight at all, then one might have expected the Plan to demonstrate ambition beyond what is simply set out in national commitments. Ironically, whilst the objective should be to be 'aspirational but deliverable', the Plan is, in places, unambitious, but with no clear path to delivery. Bristol is an authority which, for example, notwithstanding some impressive urban green space, is not especially replete with biodiverse landscapes. Notwithstanding the declaration of an ecological emergency, the Local Plan seeks the minimum net gain in biodiversity. The failure of the Sustainability Appraisal (SA) to highlight potential conflicts between the push for development and the area of land managed for nature might help to explain this (see below regarding the SA).</p> <p>The nature of engagement has been patchy. We questioned the nature of consultation last year, when a consultation on Draft Policies was held. The Council has developed this Plan in a staccato manner. Consultation has taken place in ways which have made it difficult for anyone to understand what</p>		

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								<p>the plan, in its entirety, looks like until this Regulation 19 Draft was published. Of particular note has been the absence of any attempt by the Council to elicit views from residents regarding matters of design. A leaning towards 'building tall' is not supported by the evidence, but rather (somewhat reading between the lines), by the Council's own prejudices regarding how 'efficient' use of land should be considered: efficient with respect to what, exactly? The strategic policies regarding embodied carbon undermine the tall buildings bias. Either the policy is supported by the evidence (it is not) and buildings above 5 storeys really do inevitably release more CO2 per unit of gross internal area – in which case, the Plan risks encouraging a form of building which increases the greenhouse gas emissions emitted per dwelling (the policy is akin to saying that because diesel cars emit more particulates, policy should be more permissive to allow for those extra emissions) – or the policy is simply not supported by the evidence. The Plan fails to understand this contradiction, and has failed to consider alternative strategies and policies to deliver its own objectives.</p> <p>Many of the Plan's policies fall far short of being 'clearly written and unambiguous, so it is not clear how a decision maker should react to development proposals.' The language used is rarely normative, and the wording leaves too much open for subjective interpretation. It should be considered that this may be quite deliberate, intended to give maximum latitude not just to developers, but also to the Council to formulate masterplans that allow it to propose whatever it wants, notably in the City Centre, away from the scrutiny the Local Plan should be subject to. After all, the Development Strategy policies are vague, all other than DS1a defer meaningful description of what development will look like to the anticipated 'approved development framework, masterplan and infrastructure delivery plan' for each area, all indicate Tall Buildings may be appropriate, and all feel the need to specify that Development will be in accordance with Policy FR2, raising questions as to whether the intention is to over-ride all other policies in the Local Plan that are not referenced in the DS policies. In the Updated Scoping Report accompanying the Plan, it is noted, regarding the NPPF:</p>		

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								<p>It also places requirements on local authorities to prepare design guides or codes consistent with the principles of the National Design Guide and National Model Design Code, as well as placing an emphasis on the use of trees in developments.</p> <p>What Para 129 of the NPPF actually states is:</p> <p>Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises, but may also choose to prepare design codes in support of a planning application for sites they wish to develop. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes [my emphasis].</p> <p>The requirement is not necessarily for local authorities to prepare design codes, as the SA Scoping Report has suggested, and the Scoping Report omits the crucial element of community engagement as the key input to the design codes, necessary so that they should 'reflect local aspirations'. This Local Plan seeks to impose the Council's view of what development should look like – through masterplans and the like, and through its views regarding density (dressed up as 'efficient use of land'), and tall buildings – on the City and its dwellers. There has been a complete vacuum as regards genuine consultation (in the sense of allowing the consultation to drive the outcomes) with local residents on aspects of design. The oft-used term 'urban living' (what does this mean to the average person on the street?) actually has meaning given to it through an SPD which was shaped by (according to the Foreword) 'citizens, business professionals, community representatives, planning agents, and architects.' It is, therefore, a document that leant more heavily on</p>		

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								<p>professionals with a commercial interest in development than it did on 'effective community engagement'. It could be hardly be considered an appropriate substitute to a Design Code, not least given its limited coverage of the issues that it would need to cover to qualify as such.</p> <p>None of these DS policies are, therefore, readily examinable in any meaningful sense if we cannot understand through the DS policies themselves, and through the other Strategic Policies in the Local Plan (which of them are to be applied) whether they pass the test of soundness. Given their significance to meeting the Objectives of the Local Plan, this suggest the Plan as a whole is unsound.</p> <p>Adding to the lack of clarity are the references throughout the Plan to the "One City Plan" as though was a genuinely consultative exercise across the City. The Inspectorate should be disabused of the notion that this has been some bottom-up collaborative exercise: it is an initiative of the Mayor, and has been heavily shaped by organisations which have deemed it useful to engage with the Mayor. There is no reason to believe that the City Office, or the One City Plan have longevity beyond the end of the Mayor's term. The 'City Office and One City Plan' webpages are accessed via the Mayor's website, as shown below.</p> <p>That the One City Plan has, as the Mayor's Foreword indicates, 'underpinned' the Local Plan is not a reason for celebration. If it were the case that the One City Plan was intended to underpin the Local Plan, then that should have been made abundantly clear.</p> <p>Furthermore, there are extant supplementary planning documents referenced in the Plan policies, notably the Affordable Housing Practice Note (AHPN), which will, if left in place, undermine the policies advanced in this Plan. The AHPN is referenced in the Policy AH1 and it undermines it. Given that the AHPN is, in turn, referenced in all the DS policies, then the whole basis for the provision of affordable housing in the Local Plan is also undermined. It is notable that although one of the Plan's Objectives is a specified quantity of new homes, there is no quantitative objective for affordable homes, though the preamble to AH1 (though not the policy itself) indicates an aim 'to</p>		

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								<p>achieve a minimum of 12,000 affordable new homes delivered over the Plan period. It should be noted that 12,000 over the 15-year Plan Period equates to 800 per annum. Given the Objective to deliver 1,925 homes per annum, basic mathematics shows us that the AH1 requirement – for 35% affordable housing, though even this being somewhat caveated – is not sufficient to deliver the number referred to in the preamble (800 divided by 1925 = 42%). The 35% in AH1 will, as noted above, be further undermined by the existence of the AHPN, referenced in the Policy, which allows developers to offer 20% affordable housing (amended in 2023 from the previous 10%) as long as they commence their schemes within a specified timeframe. In short, there is no hope at all of anything remotely close to 800 affordable homes being delivered each year: the figure is more likely to be of the order 300, and then, only if the overall objective for new homes is met. AH1 is especially unsound as it is not supported by the evidence (see maths above) and the AHPN renders it ineffective. Two things need to happen: the threshold affordability quotient needs to be increased, the reference to the AHPN should be removed and the AHPN should be withdrawn, or the AHPN should be substantially amended.</p>		

Policies Map – Objections and proposed modifications

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126	John Knight	Policies Map	Key. Page P10.	Unsure	-	Unsure	Unsure	-	<p>Key - The Local Nature Reserve symbol should be amended as it is not visible in areas such as the Lamplighter's Nature Reserve at Policies Map P10.</p> <p>P10 - The flood defences at Station Road, Lamplighter's Marsh and, the river bank to the south are supported in principle.</p>	-

UN SDG 8 – Objections and proposed modifications

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55	Dr. Charles Stirling	UN SDG8 Decent work and economic growth	Policy DS1: Bristol City Centre 3.1.12 The city centre	No	Justified	Unsure	No	<p>The plans for the city centre are not sound and also discriminate against those with protected characteristics. The proposals talk about many small businesses and diversity of these businesses as well as of being of regional importance. Some of the small business at least in some area of the centre attract a customer base that is not only regional but national and even international. The businesses can be that specialized. The transport links for public transport are OK, not great but OK, but many of the businesses depend on car, van or even lorry transport.</p> <p>The policy discriminates severely on these transport links both in the clear air zone, but even more importantly in provision for parking. Residents are having a 500 percent increase in parking permits for instance. The number of parking spaces has been seriously eroded making it difficult and sometimes impossible for visitors to stop. The blocking off of roads, forcing driving for longer distances is increasing pollution.</p> <p>The lack of parking provision is discriminating against many elderly and mobility impaired who have to drive for mobility reasons. The disabled parking spaces are severely limited and a blue badge is not necessarily available to someone with short term mobility disability. The cycle lanes also prevent the legal possible for a blue badge holder to park on double yellow lines as they are located inside the cycle lane.</p> <p>None of these restrictions are justified with the statement that “is a location for large-scale facilities of citywide and regional importance.” yet the council prohibited the regional hospital complex from having a transport hub which would allow visitors, staff to park and provide a public transport location due primarily due to anti-car attitudes that hurt many.</p>	Need to provide for much more disabled parking as current discriminate. Need provision for more on-street parking around the hospital complex, again discriminates against disabled. I know of at least one father who brings his disabled son in every 3 weeks, can't get into car park as uses a van due to wheelchair and can spend 45 minutes trying to park (on double yellow lines with his badge). One shop owner, disabled, hasn't been able to even get to his own business.	-

Whole – Objections and proposed modifications

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46	Alan Roberts	Whole	Whole	No	Effective	Yes	Unsure	This plan does very little to reduce working day car commuter traffic in and out of Bristol. This means that air pollution in the city will not be reduced. Air pollution has serious health consequences for those living in the city like myself. I hope the plan can be amended so it will reduce rather than increase vehicle air pollution.	I am not an expert.	-

General Issue – Sustainability Appraisal – Objections and proposed modifications

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189	Elizabeth Blackwell Properties Ltd	UL1: Effective and efficient use of land	See comment.	No	Positively prepared	No	No	<p>5.1. No objection is held in broad terms to this policy. However, modification is suggested to the final 'locations for more intensive forms of development' and associated text.</p> <p>5.2. The final sentence directs the bullet areas to including the strategic policies. However, these are locational specific strategic designations that sit within the bullets rather than cover these fully. As such a small change is recommended to make it clear to the reader that these do not exclude other locations bulleted:</p> <p>"More intensive forms of development will be expected on suitable sites, including the areas of growth and regeneration set out in the Development Strategy (Policies DS1-DS14) where:</p> <ul style="list-style-type: none"> • Within Bristol City Centre, Bristol Temple Quarter and St. Philip's Marsh; • Within or close to the city's town and district centres; and • Close to major public transport routes and corridors." <p>5.3. This approach and the supporting text align with the published Urban Living SPD, which replicates the density map therein at diagram 5.1.</p> <p>5.4. Bearing in mind the overarching and unmet need for housing within the draft plan, the Council should ensure that opportunities to secure higher densities in appropriate locations elsewhere are not omitted.</p> <p>5.5. Certification for the 'inner' and 'outer' urban area remain unclear, given the tests at paragraph 5.10 refer to access to public transport and a range of local services only. While the published Urban Living SPD referenced at paragraph 5.8 refers to 'Urban Living - Learning from recent higher density developments' this is not published within the supporting evidence base to the Regulation 19 plan.</p> <p>5.6. Nonetheless, in accessing this document from an internet search it sets out a broad geographic basis for distinguishing between 'urban' and 'outer urban' without any meaningful justification beyond</p> 	<p>5.8. It is recommended that the evidence base be reviewed and the text/diagram 5.1 altered to reflect this. This is further discussed as it pertains to Policy UL2 below. It is evident from the published Sustainability Appraisal that no alternative to Policy UL1 and UL2's (below) drafting, beyond a binary inclusion or exclusion of the policy, has been considered in developing the plan.</p> <p>5.9. Diagram 5.1 should also take account of neighbouring authorities' centres and major public transport routes/corridors, with this being particularly relevant within South Gloucestershire to the fringes of east Bristol.</p>	<p>https://files.smartsurvey.io/a/6FG45P/SL/P19-2214/Bristol Local Plan Review Reg 19 Repts 23.01.24.pdf</p>

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								<p>simple proximity to the city centre and its services/facilities therein and very generalised prevailing densities beyond. In order to maximise opportunities for delivering housing, a finer grain should be pursued to review opportunities for further housing delivery, focusing around centres and key public transport routes as set out within the policy.</p> <p>5.7. Failure to do so omits an opportunity to mitigate the planned housing shortfall against the Council's housing needs. Given the inherent reliance by the Council on windfall sites, opportunities for increased intensification of development should be robustly pursued including considering the balance of impacts with prevailing densities or where these can more readily be increased beyond a generalised 'outer' position along arterial routes and/or within/around designated centres.</p>		
369	REDROW HOMES Ltd	UL1: Effective and efficient use of land	-	No	Positively prepared	Yes	No	<p>Plan is not positively prepared, justified, effective or consistent with national policy.</p> <p>The local plan has a focus on ensuring the delivery of new homes, but key to this objective is the efficient use of land, optimising urban densities. Paragraph 5.4 states that "The use of previously developed land and other ways of making efficient use of land will continue to meet the majority of housing and other development requirements across the city."</p> <p>No evidence has been provided to support this proposition. Apart from Table 2 which summaries the sources of deliverable supply to 2040, no detailed trajectory has been published. Paragraph 5.5 states that most residential development in Bristol has been on previously developed land Residential completions on PDL have exceeded 90% over the last 10 years. However, the most recent published AMR 2022 shows that in Table H12 – Percentage of new and converted dwellings on previously developed land – for the last 10 years completions have averaged 86.5%</p>	<p>It is noted that this policy not only refers to previously developed land, but that it is also proposed to apply to the areas of growth and regeneration set in the Development Strategy. Whilst the use of previously developed land is supported in order to ensure delivery of much needed affordable housing, additional greenfield sites should be allocated.</p>	<p>https://files.smartsurvey.io/3/1/GOYS/LLY3/236610038_20966066_3291418.pdf</p> <p>https://files.smartsurvey.io/a/3L32ZV7S/Appenidx%201%20Bristol%20Housing%20Need%20-%20Redrow%20Homes%20Jan24%20-%2019.01.2024.pdf</p>

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								<p>Whilst the use of brownfield sites is supported it is clear that a strategy which focuses on brownfield and only a limited greenfield development will not enable the housing needs to be met – hence the shortfall of 26,190 dwellings.</p> <p>There are, as stated in the Forward to the Plan, 20,000 households on the housing waiting list and 1,300 in temporary accommodation. The Plan states “building more homes, an even more affordable and social housing, is key to meeting this demand but also providing good outcomes in health and employment for our residents.”</p> <p>It is noted that in February 2022 the City Council Cabinet approved the adoption and implementation of an updated Housing Delivery Plan for 2022-2025: Project 1000. This established a new approach to accelerating housing delivery in the city to meet Mayoral aspirations for the delivery of 1000 affordable homes a year from 2024.</p> <p>“We have set ourselves another stretching target of 2,000 homes a year by 2024 and we have set up ‘Project 1,000’, a project board whose sole aim is to deliver 1,000 affordable homes a year by 2024.”</p> <p>Mayor Marvin Rees, October 2021</p> <p>However, in 2021/2022 the total number of affordable homes was 436 (on average in the period 2007/08 – 2021/2022 approximately 157 affordable homes were completed). This falls a long way short of the target of 1,000 affordable homes per annum and given the emphasis on the use of PDL then it must be seriously questioned how such a target can be achieved.</p> <p>Even with the proposed policy requirement of 35% affordable housing, in order to reach the target of 1,000 homes a year – this assumes that 35% of the total proposed housing figure of 34,650 is built as affordable – this would generate about 1,212 dwellings. However, in reality it is questionable whether this would be achieved if the majority of developed sites are brownfield as there are issues of viability etc.</p> <p>Furthermore, building at high densities also puts pressure on the local environment – there is a need</p>		

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								<p>to retain open spaces and to support green infrastructure. The NPPF paragraph 119 states that planning policies and decisions should promote the effective use of land in meeting the need for new homes and other uses.</p> <p>“Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land”.</p> <p>Whilst paragraph 124 of the NPPF encourages the efficient use of land, in doing so development proposals need to consider the different types of housing required, local market conditions and viability, the availability and capacity of infrastructure and services (both existing and proposed), the desirability of maintaining an area’s prevailing character and setting.</p> <p>It is considered that the Plan fails to understand the principles of sustainable development and how these can be addressed. The NPPF (2023) states that the planning system should actively manage patterns of growth in support of the objectives set out in paragraph 105 of the NPPF:</p> <p>“...Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.”</p> <p>As the PPG on Climate Change states:</p> <p>“effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases....Planning can also help increase resilience to climate change impact through the location, mix and design of development.” Paragraph: 001 Reference ID: 6-001-20140306</p> <p>The distribution and design of new developments and the potential for servicing sites through sustainable transport solutions, are particularly important considerations that affect transport emissions. The Sustainability Appraisal should be used to test different spatial options in plans on</p>		

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								emissions. Paragraph: 007 Reference ID: 6-007-20140306 By failing to meet Bristol's housing needs this exacerbates the housing crisis and also results in people having to live further away from their place of work, and other community facilities and services, increasing their carbon footprint and contributing to pressures on the climate.		
384	HARBOUR HEADS RESIDENTS GROUP	DS4: Western Harbour	P.,28-31	-	-	-	-	(REPRESENTATION SUBMITTED AS REPORT SEE ATTACHED) The introduction to the NPPF begins by stating that it provides a framework for how policies should be applied to the preparation of local plans that can provide sufficient housing and other development in a sustainable manner1.. This submission seeks to raise concerns, reasons for objection and an outline why in 'plan-making' the Development Strategy DS4 of the Bristol (published) Local Plan November 2023: <ul style="list-style-type: none"> ● Isn't compliant with NPPF provision & purpose and isn't consistent with the application of other proposed (sustainability) Local Plan policies- details below.. ● Fails to appropriately reflect its real-world spatial context, the existing strategic infrastructure land-uses, and significant environmental constraints. ● Doesn't provide transparent, appropriate, and necessary evidence of or references to major dependencies, and how any such proposed intensive development might physically fit, could credibly achieve sustainable development requirements, be viable and/or meet the stated economic, social and environmental objectives of the planning system. This proposed (spatial) Strategic Development Policy, set within the wider (draft) Local Plan, is surely unsound in that its advocates seek to pre-emptively secure a (planning) presumption in favour of unsustainable intensive development7-11.	(REPRESENTATION SUBMITTED AS REPORT SEE ATTACHED) We feel the need to also make at least passing reference to: <ul style="list-style-type: none"> ● The inappropriate removal of identified open and greenspace designations across all the DS4 area. Please see the appendix for a visual comparison of the proposed designation with contemporary analysis within the Harbour Place-shaping Strategy and the extent of 'green' in the Local Plan and in contrast with the DS4 policy aerial image – it provides an example of the extent to which the area's character, uses and development constraints are inappropriately mis-represented within DS4 and closely associated elements of the Local Plan. ● The quality and accuracy regarding the way important uses and designations are portrayed or omitted (e.g. dock conservation area and disconnected 'blobs' for flood defence policy area) and the low-grade background to the Bristol Local Plan Policies Map hinders consideration of the Local Plan and an understanding of spatially relevant aspects. ● While we support its designation as a Maritime Industry Area and removal of Underfall Yard from the DS4 area, there is an equal case for, but no apparent consideration or rationale for not applying this in extension to areas of equivalent marine and maritime activities to the immediate East as far as and including the Dutch Barn, compound and All-Aboard and across all the marine activities located on Avon Quay. ● We would like to suggest that doing the above ought to be inter-linked with our requirement that our immediately adjacent set of residential streets be removed from the DS4 area. 	https://files.smartsurvey.io/a/6PL460AE/HARBOURHEADSRESIDENTSGROUP-REPRESENTATIONREPORT.pdf https://files.smartsurvey.io/a/EZBESXIV/RiverAvonHeriatgeAssessment2.jpg https://files.smartsurvey.io/a/T45IWP6U/RiverAvonHeritageAssessments.jpg

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								<p>DS4 is being proposed by negating, by masking the existence and density of current land-uses^{15, 16, 20} and that this place already accommodates:</p> <ul style="list-style-type: none"> ● Significant road & transport routes ● Flood risk management assets, (related) blue/green & wastewater treatment infrastructure ● Long-established amenity open and & green spaces ● Heavily used local & national walk and cycle routes & essential inter-neighbourhood connections ● An overlapping heritage conservation area & wider designations and features ● A water-sports centre & cluster of inter-related leisure and youth facilities and marine activity providers ● A corridor of significance for nature conservation that will be critical for the development of an Avon Biodiversity Recovery Network. <p>Perhaps most concerning is the lack of a single reference in any of the Local Plan Review documentation that identifies the existence within the DS4 proposed boundary of a residential community of around 135 citizens. Its homes are set in a cluster of three historic streets which are adjacent to, and relate strongly to Underfall Yard, The iconic Nova Scotia Hotel and their shared harbour and riverside setting.</p> <p>As local residents, as the existing community, we are denied recognition and have continually been excluded from the plan-making process. We have never been offered or been able to secure any dialogue with Strategic Planners or opportunity to have our voices heard. We've never been asked about or had any choice regarding our forced inclusion within this Western Harbour Strategic Development Policy Area.</p> <p>As residents, we want to make clear that we think this un-consulted inclusion of our homes is</p>		

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								<p>inappropriate and unnecessary. It feels threatening to draw in our homes, our streets our community within the Council's DS4 lines on maps. We ask that the Planning Inspectorate recognises, recommends and requires that we are all removed from the DS4 area. It should be noted that some of our homes, but not all, appear to have been removed from the map in the master-planning brief. They should all be removed from both.</p> <p>We think it relevant to raise that we have been subjected to almost a decade of Bristol City Council AVTM Metrobus development and the subsequent related Avon Cut Wall collapse & 3½ years of repair works. Its not just the construction impacts but BCC's ongoing refusal of dialogue, to recognise, enforce and meet its still-outstanding environmental, sustainability and public safety conditions and required mitigations as were defined by local planning approval, prior public enquiry and the DoT Transport Order.</p> <p>Contrary to the impression given by the text of DS4 and its reliance on related Growth and Regeneration Area common aspects of the published Local Plan, the Cumberland Basin Area is not a (potential) single unified or grouping of identified or identifiable 'brownfield' sites that are ready for redevelopment. They have come into the custodianship of the Council (on behalf of the public) largely as prior assets of the Harbour Authority and there is a need to give appropriate and due consideration of their existing uses and functions.</p> <p>A significant proportion of the surface area within the Council's shifting lines on maps with which it seeks to define 'Western Harbour' (the area is actually called Cumberland Basin, Hotwells and has been for over 200 years) have for good reasons remained largely undeveloped at ground level (except for harbour-related uses). Much of the land accommodates the elevated distributional road</p>		

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								<p>system that services Plimsoll Bridge and also vital provision of flood plain space for tidal water.</p> <p>It's not made clear within the published Local Plan prior 'consultative' draft policy proposals or key supplementary documents that the viability of Cumberland Basin residential development is fundamentally dependent upon the approval of flood risk scheme proposals and funding bids to central Government. The commitment of huge investment of (predominantly) public funds, and the displacement and loading of significant negative impacts onto surrounding communities and environments are also not clear.</p> <p>Bristol Council has to date refused to disclose critical information, in particular the cost-estimates that it had for major capital repairs to Plimsoll Bridge and the related road system, and for various previously identified different layout options for replacing them to 'enable' Western Harbour . Given that this is a fundamental dependency, this alone ought to make the inclusion of DS4 unsound.</p> <p>As local residents our concerns are mainly that:</p> <ul style="list-style-type: none"> ● Western Harbour (as a development policy) requires massive enabling 'hard' flood defences - not just around un-identified largely flood plain 'development sites' but all along the Avon Cut to mitigate the deferred risk to others. There is no apparent consideration of the foregone value of this 'space for water' future climate change adaptive potential. ● DS4 fundamentally depends on replacing bridges & making major 'rationalising' changes to the layout of the existing elevated road network - we want repair of this currently effective road system to be considered. ● The potential scale of residential development DS4 seeks to plan for, would inevitably push significant negative road infrastructure impacts and life quality compromises onto surrounding communities and 		

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								<p>environments. There is no meaningful consideration of the destructive and disruptive environmental impacts of the process of doing so. The Sustainability Appraisal does not offer a consideration of either.</p> <ul style="list-style-type: none"> • DS4 would effectively override potential application of and thus confidence in other (contradictory) Local Plan protective and sustainability policies within its boundary lines and surrounding areas. <p>In addition, proper consideration should also be given to the impact of these dependencies on (economic) viability, given that these two elements will require at least £½ billion and quite probably in excess of £1 billion of predominantly public funding and/or borrowing.</p> <p>For the undisclosed DS4 target of 2,500 homes* the level of development-dependent subsidy might equate to something like £375k per residential unit. This surely raises very significant and fundamental doubt about the viability, economic value and entire credibility of DS4.</p> <p>(*Stage 1: Habitats Regulations Assessment Screening Report Reference: 296345-00 Version 1 31 July 2023)</p> <p>It seems a highly inappropriate pre-emptive policy, that would appear to undermine two of the main attempted social value justifications for intensive residential development (Policy UL2 and specifically 6.22 & 6.23) that for Western Harbour the sought proportion of affordable housing will be only 20%, and that if offered by developers (without site specific rather than massive development policy area public subsidy) applications won't be subject to a viability assessment. That presumably means they won't contribute to infrastructure costs or be liable for Community Infrastructure Levy.</p> <p>The Western Harbour proposition is that there exists, or somehow can be made to exist, substantial areas of unused or under-utilised space around Cumberland Basin & straddled across the Tidal Avon</p>		

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								<p>(& its flood plain) between the City and the Gorge, that there is land that is readily available and suitable to realise for such a scale and intensity of residential development.</p> <p>It is unfortunate that the overwhelming level of local concerns about the inappropriateness of the Western Harbour DS4 proposition hasn't previously been recognised or represented.</p> <p>To locals the scheme seems to be a presumption in favour of subsidised unsustainable intensive development in the flood plain location, where doing so fundamentally compromises the space for water required to affordably manage both the City's current and climate change future tidal flood risk adaptation and sustainability needs.</p> <p>In raising fundamental objection to the inclusion of the DS4 policy, we want to make clear that:</p> <ul style="list-style-type: none"> ● There is also much to support and we agree with regarding the rest of the policies within the local plan. ● We would want to support proportionate, feasible and sustainable regeneration that contributes to delivery of (especially affordable) new homes. That we do recognise scope for development around the Cumberland Basin Area, where that can be accommodated and won't result in the loss of heritage and existing important uses. In particular there is immediate opportunity to progress without DS4 through the better mixed re-use and development of the Bonded Warehouses. ● We recognise the need and potential for development of a compliant, viable and much more affordable capital investment case to sustain, improve and adaptively evolve flood risk management. One that suitably values and builds upon existing systems, operations and the harbour's flood-water storage capacity. ● There is a need for substantial capital investment to revitalize and sustain the full lifespan of the important transport function of Plimsol Bridge and 		

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								<p>its raised road system. Ideally this can be coupled with addressing its polluting and noise impacts as part of transitioning it towards and beyond net zero.</p> <p>It is concerning considering the character and location of DS4 area, that it is defined in the Local Plan as being a 'city centre' location, rather than as a city gateway and accessible area of the Harbourside. It seems unrealistic to pre-emptively define this area as suitable for the most intensive residential development target of 200 units per hectare, minimal.</p> <p>The area is an edge of city location with an overlap into real greenbelt. It has strong relationships with and provides linkages between surrounding neighbourhood communities and the range of shared services and cultural facilities, as well as to Grenville Smyth Park, Ashton Court, Ashton Park, the Avon Gorge, Leigh Woods, 5 allotments and substantial greenspace and parklands via Ashton Meadows.</p> <p>As was especially obvious during the Covid era, this area and routes through it provide the linkage for many of Bristol's citizens to the harbour and gorge- its most accessible heritage greenbelt.</p> <p>An appreciation of its heritage and the area's wider importance in providing recreational space is strongly reflected as the positive and clearly articulated outcomes of the Harbour Hopes visioning process. The report and consultative responses to it, which seemed to successfully capture reflection of what the rest of the people of the wider city think matters most about this area and its future, seems to be lost in the DS4 description.</p>		
418	BRISTOL, CLIFTON AND WEST OF ENGLAND ZOOLOGICAL SOCIETY	DA1: Proposed development allocations - (various)	pp.221-222	No	Positively prepared, justified, effective, consistent	No	No	<p>(REPRESENTATION SUBMITTED IN NON-STANDARD FORMAT - SEE ATTACHED FOR FULL DETAILS)</p> <p>Plan is not positively prepared, justified, effective or consistent with national policy.</p>	-	https://files.smartsurvey.io/3/1/00DZ3ZH4/237071417_20966

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					with national policy.			<p>1. Savills submitted representations on behalf of Bristol, Clifton & West of England Zoological Society (BCWEZS) to an earlier version of this draft policy at the previous consultation stage in November 2022. The representations below are an evolution of those representations.</p> <p>2. BCWEZS object to the omission of the site known as 'Bristol Zoo Gardens' (BZG) from the list of proposed allocations within Policy DA1. BZG (herein referred to as the 'site') is located adjacent to The Downs, to the south of Clifton Down Road, in the city's Clifton Ward.</p> <p>3. The site was submitted to the Council's Call for Sites process in the previous version of the Local Plan in 2023. A copy of the completed 2023 Call for Sites Form is appended to these representations at Appendix A. As demonstrated within the submission, the site is considered to be appropriate for circa 200 dwellings, along with the provision of Class E, F1 and F2 floorspace for a community / educational hub, as well as the provision of public access during daylight hours. The submission demonstrated that the site is suitable, available and achievable for the delivery of a residential-led redevelopment. The case for the allocation of the site for residential-led redevelopment has been made in the 2023 representation and is not repeated here, however a copy of these representations is enclosed in Appendix B.</p> <p>4. At the point of the previous round of consultation on the local plan in 2023, there was a pending planning application (reference number: 22/02737/F and 22/028889/LA) for the redevelopment of the site which had been submitted in May 2022. The description of development is as follows: "Redevelopment of site to include 196 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings."</p> <p>5. Since the 2022 Local Plan consultation, the site</p>		066_3299418.pdf https://files.smartsurvey.io/a/KTQSK5JV/BCWZS - Cover Letter.pdf

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								<p>has progressed and secured a resolution to grant planning permission at Planning Committee in April 2023. The decision notice is due imminently. The resolution to grant demonstrates the suitability, availability and achievability of the site for residential-led redevelopment.</p> <p>6. Notwithstanding the fact that BZG was previously promoted through the Local Plan, there is no evidence that it has been considered by the Council in the Sustainability Appraisal (SA) or any other evidence base document as a proposed residential-led allocation. Furthermore, the Local Plan stays silent on BZG in its totality, failing to acknowledge the benefits the opening up of the site to the public for free for the first time since it opened in 1836.</p> <p>7. As part of their relocation to the Bristol Zoo Project site, BCWEZS will be disposing of the site and they are currently in the process of appointing a developer to take forward the proposed redevelopment. It is therefore appropriate to safeguard the Council's support for the redevelopment of BZG through allocation within the emerging Local Plan.</p> <p>8. In line with the Planning and Compulsory Act 2004, a SA (2023) accompanies the Local Plan consultation. The SA recognises the statutory requirement for sustainability appraisals to test 'reasonable alternatives' to what is proposed, taking account of the objectives and geographical scope of the plan. The SA does not undertake any site specific appraisal of land that it has not proposed for allocation within the Regulation 19 draft Local Plan, despite the emerging Plan's proposed housing target falling well below the Standard Method figure and even before any Urban Uplift is applied. The only site assessed other than allocations is Yew Tree Farm (ref: DS11B) which was previously proposed as a site allocation.</p> <p>9. Taking into consideration the above, there is insufficient evidence to conclude that the Regulation 19 draft Local Plan or the SA is sound on the grounds that:</p> <ul style="list-style-type: none"> • It has not been positively prepared; 		

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								<ul style="list-style-type: none"> • It is not justified; and • It is not consistent with national policy and legislation. <p>10. To remedy this, Savills have undertaken a site specific assessment of BZG as an additional residential site allocation at Figure 1. This assessment follows the same format that is used for the SA that are proposed within draft Policy DA1, as set out within Appendix 4 and Table 15 of the SA.</p> <p>11. This assessment, with supporting commentary on each of the 42 'Decision-Making Criteria (DMC)', concludes that BZG performs more favourably on scoring than all of the sites that the Council are proposing as allocations (with the majority of BZG scoring a minor positive or significant positive), and includes no certain negatives (scored as 'minor negative' or 'significant negative' in the key below). This supports the case for BZG' inclusion as an additional residential-led allocation within draft Policy DA1. The draft policy text is outlined in paragraph 14.</p>		
428	BLACK BOX PLANNING	H1: Delivery of new homes – Bristol's housing requirement Sustainability Appraisal of the Bristol Local Plan Pre- Submission Publication Version (2023)	-	No	Justified and Consistent with national policy	No	No	<p>Policy is not: Justified and Consistent with national policy.</p> <p>The Council has not discharged its responsibilities under the duty to cooperate by virtue of failing to seek early engagement on exporting its significant unmet needs. As such, we believe that reasonable steps have not been taken by the Council to comply with the duty. We believe this goes to the heart of the question of soundness. The Sustainability Appraisal fails to test alternative quantum of growth beyond the Council's preferred option of 1,925 dwellings per annum, either lower or higher. The reasons given for this prejudice the effects of alternative quantum of growth without testing and are not reasonable. The absence of the SHLAA alongside the publication draft of the Local Plan is a key weakness in the evidence base. Taken together we believe it is not possible to conclude that the plan rests on a credible</p>	The Sustainability Appraisal should be amended to test a more appropriate range of reasonable alternative growth scenarios in both quantitative and spatial dimensions.	https://files.smartsurvey.io/3/1/GR50N2T4/237148979_20966066_3294008.pdf

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								evidence base, and as such we question the extent to which it is legally compliant.		
448	Dominic Hogg	Overall Local Plan and Evidence Documents	-	-	-	-	-	<p>*PLEASE SEE DOCUMENT ATTACHED FOR SUBSTANTIVE COMMENT*</p> <p>Only in respect of identifying sites could this Plan be considered to be positively prepared, but even here, the risk of exposure of sites to the risk of flooding-highlighted in the SA - has only been partially dealt with (the Plan to address flood risk has no certainty of being of funded) and whilst there is an attempt to demonstrate that a sequential test has been applied through supporting evidence, we doubt that this can be satisfactorily demonstrated, not least given the lateness at which the evidence has emerged in the development of the Local Plan: both Level 1 and Level 2 SFRA Reports are dated 2023, and appear to focus not on the application of the test, but on the assumption that there are no alternatives to the sites allocated (so that the focus is on exception texts). It also seems highly questionable that the needs of the city in terms of commercial office space are underprovided where it is needed (see the JLL Employment Land Review, prepared for Bristol City Council, another document which provides 'supporting evidence', but comes rather late in the day – June 2023). Evidence, such as it has been provided, has come either rather late in the day, or is out of date. That partly reflects the chaotic gestation of this Local Plan.</p> <p>Many of the Plan's policies are not justified and not evidenced.</p> <p>As regards consistency with national policy, the Plan falls short in many key areas as mentioned above, notably in respect of the (related) inadequate emphasis on fostering quality design as perceived by local communities, climate change, biodiversity (managing land for nature), and waste.</p> <p>In short, the Plan is unsound for some very significant reasons. These are unlikely to be soluble</p>	-	https://files.smartsurvey.io/a/UX83UMCM/DHoggRepsReport.pdf

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								<p>without major revision.</p> <p>This is unfortunate. Bristol lacks an up to date Plan, and we believe that this situation has been allowed to persist so that the tilted balance can be invoked to give the green light to developments that have little public support, but which the political leadership in the City has been keen to see go forward, notwithstanding their limited sustainability credentials.</p> <p>All the more reason, then, for the Plan, at the strategic level, to be clear about what is or is not 'sustainable'. Indeed, for this very reason, a 'positively prepared' plan ought to address the issue as to what makes development 'sustainable' head on. The NPPF gives weight to this matter through its emphasis on design, a matter we consider further below.</p> <p>Assessment Against Overarching Principles of the NPPF Section 1: Introduction</p> <p>Para 2 of the National Planning Policy Framework (NPPF) states:</p> <p>The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements</p> <p>It goes on to state:</p> <p>3. The Framework should be read as a whole (including its footnotes and annexes). General references to planning policies in the Framework should be applied in a way that is appropriate to the type of plan being produced, taking into account policy on plan-making in chapter 3.</p>		

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								<p>4. The Framework should be read in conjunction with the Government’s planning policy for traveller sites, and its planning policy for waste. When preparing plans or making decisions on applications for these types of development, regard should also be had to the policies in this Framework, where relevant.</p> <p>In our view, the Council’s development plan has failed to properly take into account key matters addressed in the NPPF. It fails the tests of soundness (see below) in multiple ways. The Plan also fails to reflect relevant international obligations and statutory requirements.</p> <p>Assessment Against the NPPF’s Section 3: Plan-making</p> <p>Vision</p> <p>As per para 15, up to date plans should</p> <p>provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings</p> <p>As we indicate below, the vision as set out in the Local Plan makes no sense, and the aims and objectives are in conflict, a matter which should have been identified in the SA, but was not. The vision is not.</p> <p>Plan Preparation.</p> <p>As per Para 16 of the NPPF, Plans should:</p> <p>a) be prepared with the objective of contributing to the achievement of sustainable development9;</p> <p>b) be prepared positively, in a way that is aspirational but deliverable;</p> <p>c) be shaped by early, proportionate and effective engagement between plan-makers and</p>		

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								<p>communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;</p> <p>d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</p> <p>e) be accessible through the use of digital tools to assist public involvement and policy presentation; and</p> <p>f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).</p> <p>Footnote 9 in the above extract makes reference to the legal requirement of Planning Authorities to ‘exercise the function with the objective of contributing to the achievement of sustainable development’.¹ That includes having ‘regard to the desirability of achieving good design’. Sustainable development has three overarching objectives, as per Para 8 of the NPPF, which are ‘are interdependent and need to be pursued in mutually supportive ways.’</p> <p>These are (as per Para 8 of the NPPF):</p> <p>a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</p> <p>b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and</p>		

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								<p>c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p> <p>9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.</p> <p>The Local Plan Objectives are a combination of a quantitative housing target (bit no quantitative target for affordable homes), alongside meaningless verbiage that highlights the narrowness of the focus of the Local Plan on economic and social objectives to the exclusion of environmental concerns. This is also reflected in the poor quality of the sustainability appraisal, which could have posed, but did not, a challenge in respect of the potential trade-offs across these objectives For example, how do policies DS10-12 help resolve the tension between ‘Enabling delivery of at least 1,925 new homes a year in Bristol up to 2040 including affordable housing and homes to meet a range of needs’ and the aim ‘Protect our valued open spaces, promote food growing and increase the tree canopy to support a liveable, healthy city’? Would these not have been potential areas to manage positively for nature? How does the aim ‘Actively respond to the climate and ecological emergencies whilst securing sustainable development’ find itself reflected in the Objective for housing, given that NZC3 is permissive of a greater level of GHG emissions from taller buildings than smaller ones? How does the objective of ‘Enabling delivery of at least 1,925 new homes a year in Bristol</p>		

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								<p>up to 2040 including affordable housing and homes to meet a range of needs' sit alongside</p> <p>1 Section 39(2) and (2a) of the Planning and Compulsory Purchase Act 2004.</p> <p>'Manage the development of student housing to safeguard existing communities whilst supporting thriving universities by meeting student accommodation needs'? There have been national level discussions around the potential tensions between accommodating a growing number of students from overseas and delivering housing: why is this not a relevant conversation for the Plan to engage in? Some of the most visually intrusive proposals for new development come in the form of purpose built student accommodation in the City Centre: how do such proposals sit with the aim to 'Cherish the city's historic environment and harness the benefits of heritage sensitive regeneration'? Is this what is intended by the aim to 'Take a plan-led approach to promoting areas with the potential to increase densities and make efficient use of under-used land; this includes transforming some areas of the city to create communities with new homes, workplaces and public open spaces'?</p> <p>The vision includes bizarre and completely unsubstantiated statements to the effect that, by 2030 'Bristol will have met its zero carbon reduction targets', yet by 2040, close to 20,000 additional homes will have been built after 2030. This would take place under a policy (NZC3) which allows embodied GHG emissions to be of the order of 500kgCO2/m2 before anyone has an incentive to reduce them. By all means, articulate an ambitious vision, but why make statements that are obviously inconsistent with the only quantitative Objective that sits under the Vision? At an average of (say) 70m2 per dwelling, the emissions related to building these 20,000 dwellings could amount to 700,000 tonnes CO2 over the decade. Consideration regarding how these emissions could have been lowered should</p>		

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								<p>have been considered either in respect of alternative policies under the SA, under alternative modes of delivering policies under the SA, thorough consideration of the evidence as regards NZC3, or in respect of challenging the perspective as regards Tall Buildings (DC2). That this issue was not tackled in the suggested manner is lamentable.</p> <p>If the Council's own declarations – of a climate emergency, and ecological emergency – were to be given any weight at all, then one might have expected the Plan to demonstrate ambition beyond what is simply set out in national commitments. Ironically, whilst the objective should be to be 'aspirational but deliverable', the Plan is, in places, unambitious, but with no clear path to delivery. Bristol is an authority which, for example, notwithstanding some impressive urban green space, is not especially replete with biodiverse landscapes. Notwithstanding the declaration of an ecological emergency, the Local Plan seeks the minimum net gain in biodiversity. The failure of the Sustainability Appraisal (SA) to highlight potential conflicts between the push for development and the area of land managed for nature might help to explain this (see below regarding the SA).</p> <p>The nature of engagement has been patchy. We questioned the nature of consultation last year, when a consultation on Draft Policies was held. The Council has developed this Plan in a staccato manner. Consultation has taken place in ways which have made it difficult for anyone to understand what the plan, in its entirety, looks like until this Regulation 19 Draft was published. Of particular note has been the absence of any attempt by the Council to elicit views from residents regarding matters of design. A leaning towards 'building tall' is not supported by the evidence, but rather (somewhat reading between the lines), by the Council's own prejudices regarding how 'efficient' use of land should be considered: efficient with respect to what, exactly? The strategic policies regarding embodied carbon undermine the tall buildings bias. Either the</p>		

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								<p>policy is supported by the evidence (it is not) and buildings above 5 storeys really do inevitably release more CO2 per unit of gross internal area – in which case, the Plan risks encouraging a form of building which increases the greenhouse gas emissions emitted per dwelling (the policy is akin to saying that because diesel cars emit more particulates, policy should be more permissive to allow for those extra emissions) – or the policy is simply not supported by the evidence. The Plan fails to understand this contradiction, and has failed to consider alternative strategies and policies to deliver its own objectives.</p> <p>Many of the Plan’s policies fall far short of being ‘clearly written and unambiguous, so it is not clear how a decision maker should react to development proposals.’ The language used is rarely normative, and the wording leaves too much open for subjective interpretation. It should be considered that this may be quite deliberate, intended to give maximum latitude not just to developers, but also to the Council to formulate masterplans that allow it to propose whatever it wants, notably in the City Centre, away from the scrutiny the Local Plan should be subject to. After all, the Development Strategy policies are vague, all other than DS1a defer meaningful description of what development will look like to the anticipated ‘approved development framework, masterplan and infrastructure delivery plan’ for each area, all indicate Tall Buildings may be appropriate, and all feel the need to specify that Development will be in accordance with Policy FR2, raising questions as to whether the intention is to over-ride all other policies in the Local Plan that are not referenced in the DS policies. In the Updated Scoping Report accompanying the Plan, it is noted, regarding the NPPF:</p> <p>It also places requirements on local authorities to prepare design guides or codes consistent with the principles of the National Design Guide and National Model Design Code, as well as placing an emphasis on the use of trees in developments.</p>		

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								<p>What Para 129 of the NPPF actually states is:</p> <p>Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises, but may also choose to prepare design codes in support of a planning application for sites they wish to develop. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes [my emphasis].</p> <p>The requirement is not necessarily for local authorities to prepare design codes, as the SA Scoping Report has suggested, and the Scoping Report omits the crucial element of community engagement as the key input to the design codes, necessary so that they should 'reflect local aspirations'. This Local Plan seeks to impose the Council's view of what development should look like – through masterplans and the like, and through its views regarding density (dressed up as 'efficient use of land'), and tall buildings – on the City and its dwellers. There has been a complete vacuum as regards genuine consultation (in the sense of allowing the consultation to drive the outcomes) with local residents on aspects of design. The oft-used term 'urban living' (what does this mean to the average person on the street?) actually has meaning given to it through an SPD which was shaped by (according to the Foreword) 'citizens, business professionals, community representatives, planning agents, and architects.' It is, therefore, a document that leans more heavily on professionals with a commercial interest in development than it did on</p>		

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								<p>'effective community engagement'. It could be hardly be considered an appropriate substitute to a Design Code, not least given its limited coverage of the issues that it would need to cover to qualify as such.</p> <p>None of these DS policies are, therefore, readily examinable in any meaningful sense if we cannot understand through the DS policies themselves, and through the other Strategic Policies in the Local Plan (which of them are to be applied) whether they pass the test of soundness. Given their significance to meeting the Objectives of the Local Plan, this suggest the Plan as a whole is unsound.</p> <p>Adding to the lack of clarity are the references throughout the Plan to the "One City Plan" as though was a genuinely consultative exercise across the City. The Inspectorate should be disabused of the notion that this has been some bottom-up collaborative exercise: it is an initiative of the Mayor, and has been heavily shaped by organisations which have deemed it useful to engage with the Mayor. There is no reason to believe that the City Office, or the One City Plan have longevity beyond the end of the Mayor's term. The 'City Office and One City Plan' webpages are accessed via the Mayor's website, as shown below.</p> <p>That the One City Plan has, as the Mayor's Foreword indicates, 'underpinned' the Local Plan is not a reason for celebration. If it were the case that the One City Plan was intended to underpin the Local Plan, then that should have been made abundantly clear.</p> <p>Furthermore, there are extant supplementary planning documents referenced in the Plan policies, notably the Affordable Housing Practice Note (AHPN), which will, if left in place, undermine the policies advanced in this Plan. The AHPN is referenced in the Policy AH1 and it undermines it. Given that the AHPN is, in turn, referenced in all the DS policies, then the whole basis for the provision of affordable housing in the Local Plan is also</p>		

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								<p>undermined. It is notable that although one of the Plan's Objectives is a specified quantity of new homes, there is no quantitative objective for affordable homes, though the preamble to AH1 (though not the policy itself) indicates an aim 'to achieve a minimum of 12,000 affordable new homes delivered over the Plan period. It should be noted that 12,000 over the 15-year Plan Period equates to 800 per annum. Given the Objective to deliver 1,925 homes per annum, basic mathematics shows us that the AH1 requirement – for 35% affordable housing, though even this being somewhat caveated – is not sufficient to deliver the number referred to in the preamble (800 divided by 1925 = 42%). The 35% in AH1 will, as noted above, be further undermined by the existence of the AHPN, referenced in the Policy, which allows developers to offer 20% affordable housing (amended in 2023 from the previous 10%) as long as they commence their schemes within a specified timeframe. In short, there is no hope at all of anything remotely close to 800 affordable homes being delivered each year: the figure is more likely to be of the order 300, and then, only if the overall objective for new homes is met. AH1 is especially unsound as it is not supported by the evidence (see maths above) and the AHPN renders it ineffective. Two things need to happen: the threshold affordability quotient needs to be increased, the reference to the AHPN should be removed and the AHPN should be withdrawn, or the AHPN should be substantially amended.</p>		
455	Structadene	H1: Delivery of new homes – Bristol's housing requirement	p.68	No	Justified	Yes	Yes	<p>Policy H1 - Delivery of new homes – Bristol's housing requirement</p> <p>An annual average minimum of 1,925 new homes will be delivered by 2040. The aspiration is that this figure will be exceeded where this is supported by service and infrastructure capacity.</p> <p>3.1 Structadene is supportive of the need to deliver housing and supports the word 'minimum' in this context and the aspiration to exceed a 'minimum'</p>	<p>3.5 Structadene therefore advocates that – given the policy already states "where this is supported by service and infrastructure capacity" – the housing need identified should be modified to the Standard Method figure (excluding the 35% uplift) and that Bristol City Council should expedite the redevelopment of strategic redevelopment areas including St Philips Marsh to make up the difference over the Plan period, including if necessary by allocating more housing and building at higher densities in these areas.</p>	-

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								<p>target. However, Structadene considers the annual average minimum of 1,925 new homes to be too low.</p> <p>3.2 As set out in the Bristol Local Plan’s Sustainability Appraisal (SA), “Bristol has a growing population, above that of the national average, which is leading to high demand for new housing” . Paragraph 11 of the NPPF (September 2023 – the relevant version for the examination of this Plan) requires strategic policies to, as a minimum, provide for objectively assessed needs for housing and other uses as well as any needs that cannot be met within neighbouring areas. These policies “should be informed by a local housing need assessment, conducted using the standard method set out in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals” .</p> <p>3.3 The SA attempts to justify the decision to discard the Standard Method +35% urban uplift as a reasonable alternative to the 1,925dpa on the basis that (1) other indicators reveal a different level of demand, and (2) that the city does not have a history of delivering such a high quantum of housing.</p> <p>3.4 Both arguments are flawed. First, because the +35% urban uplift is an arbitrary – not evidenced – adjustment and will not therefore mirror other housing need calculations. Second, past undersupply cannot be an excuse for future under-delivery, particularly in the context of the aforementioned high demand for new housing and worsening affordability. Neither of these justifications represent exceptional circumstances to depart from the Standard Method. However, it would be justified to deviate from the +35% uplift on the basis that it is not objectively derived – taking instead the basic Standard Method figure of 2,503dpa. This will allow Bristol City Council to meet a greater proportion, if not all, of its objectively assessed need, whilst also making sure that the target is realistic and</p>		

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								<p>achievable.</p> <p>3.5 Structadene therefore advocates that – given the policy already states “where this is supported by service and infrastructure capacity” – the housing need identified should be modified to the Standard Method figure (excluding the 35% uplift) and that Bristol City Council should expedite the redevelopment of strategic redevelopment areas including St Philips Marsh to make up the difference over the Plan period, including if necessary by allocating more housing and building at higher densities in these areas.</p> <p>3.6 Structadene is committed to the delivery of their sites in St Phillip’s Marsh in the plan period and see housing as being a key part in the delivery of a mixed use scheme. Structadene recognises that St Phillip’s Marsh has a reasonable quantum of employment use and that the wider area will likely retain an element of employment floorspace.</p>		

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488	Taylor Wimpey & Vistry Homes	H1: Delivery of new homes – Bristol's housing requirement	pp.68-69	No	Justified, consistent with national policy	No	No	<p>(REPRESENTATION SUPPLEMENTED WITH ATTACHED LETTER)</p> <p>POLICY IS NOT JUSTIFIED OR CONSISTENT WITH NATIONAL POLICY</p> <p>The Council has not discharged its responsibilities under the duty to cooperate by virtue of failing to seek early engagement on exporting its significant unmet needs. As such, we believe that reasonable steps have not been taken by the Council to comply with the duty. We believe this goes to the heart of the question of soundness.</p> <p>The Sustainability Appraisal fails to test alternative quantum of growth beyond the Council's preferred option of 1,925 dwellings per annum, either lower or higher. The reasons given for this prejudice the effects of alternative quantum of growth without testing and are not reasonable. The absence of the SHLAA alongside the publication draft of the Local Plan is a key weakness in the evidence base. Taken together we believe it is not possible to conclude that the plan rests on a credible evidence base, and as such we question the extent to which it is legally compliant.</p>	The Sustainability Appraisal should be amended to test a more appropriate range of reasonable alternative growth scenarios in both quantitative and spatial dimensions.	https://files.smartsurvey.io/3/1/EYQM6TI1/237485990_20966066_3299191.pdf

General Issues – Infrastructure Delivery Plan – Objections and proposed modifications

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261	Hotwells and Cliftonwood Community Association	IDC1: Development contributions and CIL/SV1: Social value and inclusion	pages 61 -62	No	Effective	Unsure	Unsure	<p>25. Objection to Policy IDC1 and SV1 is that – Developer contributions and Community Infrastructure Levy (CIL) and Social Value outputs from Western Harbour are not assured and there is no guarantee they will be forthcoming for the local area. It is totally unclear how the CIL, social value and the economic benefits of Western Harbour Development would be developed, who would be party to any negotiations and what percentage of development costs this might represent. Most local authorities would have an Infrastructure Delivery Plan Schedule. There is no indication whether an Infrastructure Delivery Plan Schedule would be developed for the City, or for each major strategy area. This clearly needs a lot more working out and until that work is done these policies are clearly unsound.</p> <p>26. Within our area there are significant levels of deprivation. There is also a significant transient community. What will the social value of these developments bring for local people? What will these plans do to improve lives for local people, help reduce deprivation, support local businesses and create local jobs?</p> <p>27. People who are already living in deprivation in the area around Western Harbour are disproportionately affected by the lack of opportunities, services, and amenities in the area. This needs to be addressed much more strongly by Western Harbour development proposals with funding set aside for example of a new community facility ideally at B Bond, for additional school places, new local medical facilities, and for local business support as well as employment and training initiatives to enable local young people to get jobs from development.</p> <p>28.</p>	<p>Change required- we need to agree how the CIL proposals will be worked out for this area and how they will be spent inline with community need.</p> <p>29. Conclude Local Plan is unsound with regard to Policy IDC1: Development Contributions and CIL and Policy SV1 Social Value and Inclusion.</p>	https://files.smartsurvey.io/a/DXZ35R15/HCCA Obejction to Bristol Local Plan January 2024.pdf
473	National Highways	Infrastructure Delivery Plan	P.61	No	Justified, effective	-	-	(REPRESENTATION SUBMITTED IN NON STANDARD FORMAT SEE ATTACHED)	<p>Infrastructure Delivery Plan (IDP) Draft – September 2023</p> <p>Paragraph 1.1 of this document advises that it covers a period</p>	https://files.smartsurvey.io/3/1/W2G

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								<p>Policy is not: justified and effective.</p>	<p>until 2036 which is inconsistent with the Local Plan period that runs until 2040. Clarification is requested on this point. In addition, we seek clarity on the proposed years for assessment within the forthcoming</p> <p>strategic highway assessment using WERTM and what infrastructure from the IDP that has been included/omitted.</p> <p>IDP Appendix B sets out the currently proposed infrastructure schedule, including road schemes, although it is unclear how the need for or scope of these schemes has been identified in the absence of a strategic transport evidence base. The need for any SRN improvements to accommodate the impact of the Plan has not yet been determined so no schemes on the SRN are currently included with the IDP.</p> <p>Should the need for mitigation on the SRN be identified, then concept scheme designs, cost estimates and funding arrangements will need to be progressed to inform viability and deliverability. Any SRN mitigation will need to be set out within the IDP and signposted within relevant Local Plan policies. The IDP should also set out how the delivery of development will be managed to ensure that essential infrastructure, services and other investment will be delivered in a timely manner to prevent an unacceptable safety impact on the SRN.</p> <p>Given the target date for Examination we request that BCC consult National Highways to agree the scope of the transport evidence base and undertake the necessary assessment to identify any mitigation required to safely accommodate planned growth. This is necessary to ensure that the Local Plan can be found 'justified' and 'effective' as per NPPF paragraph 35 at Examination.</p>	<p>2JYFS/23746 3260_20966 066_329174 4.pdf</p>