

**Brief responses to main issues raised in
representations to Local Plan
Publication Version (November 2023)**

Bristol City Council

July 2024



Contents

Purpose of this paper	3
General issues.....	3
Vision: Building a better Bristol	5
Development strategy	9
Infrastructure and Developer Contributions.....	59
Urban Living: Making the best use of the city’s land	64
Housing.....	76
Economy.....	124
Centres, Shopping and the Evening Economy.....	146
Biodiversity and Green Infrastructure.....	160
Transport	225
Community facilities.....	236
Net zero and climate	245
Design and Conservation.....	294
Health, wellbeing and food sustainability	316
Utilities and Minerals	328
Development allocations.....	330
Omissions	370

Purpose of this paper

This paper has been prepared in response to the [Procedure Guide for Local Plan Examinations](#). While not a legal requirement, the Procedure Guide advises that it will be very helpful to the inspector if the LPA (*the council*) provides brief responses to the main issues raised in the representations and to any substantial concerns about soundness or legal compliance raised in the representations.

A total of [1,634 representations](#) were made to the Bristol Local Plan Publication Version (November 2023) by 436 respondents during the representations period of Tuesday 21st November 2023 to Friday 26th January 2024. The main issues have been summarised in the [Regulation 22\(1\)\(c\) Statement of Consultation](#) and these are shown in the left hand column below (some issues identified by the council are also shown). The council’s brief comments on the main issues are shown in the next column with any suggested main or additional modifications shown on the right.

General issues

Maintaining effective cooperation

Main issues raised	Council’s comments	Suggested modifications / actions
<p>Concern that the council had not met its duty to cooperate with adjoining local planning authorities on strategic policy matters was raised:</p> <ul style="list-style-type: none"> In relation to how unmet housing need in Bristol would be accommodated in neighbouring authority areas, the absence of a statement of common ground which detailed an agreed approach to meeting this 	<p>Two statements of common ground have been published alongside the local plan which set out the approach to cross boundary strategic matters. Bristol City Council has requested neighbouring authorities consider accommodating a proportion of unmet housing need.</p>	<p>No modifications suggested – but see also suggested modification regarding plan monitoring and review.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>need was noted by representors from the housing development industry / landowners.</p>		
<ul style="list-style-type: none"> SevernNet (Representor Ref. No. 389) thought there had been inadequate cross-boundary coordination regarding the Portbury, Avonmouth and Severnside areas. They felt that, by focussing on Avonmouth rather than also considering Portbury in North Somerset and Severnside in South Gloucestershire, opportunities had been missed to provide a more positive strategy for the area as a whole, for example by identifying common opportunities and challenges such as transport and infrastructure requirements. 	<p>Two statements of common ground have been published alongside the local plan which set out the approach to cross boundary strategic matters. These discuss the approach to the Bristol Port and wider Avonmouth/Severnside area. Planning policy for this area within Bristol is set out in Policy E4.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> David Gray (303) considered there had been a failure to carry out cross-boundary work on reducing transport-related air pollution, commuting and carbon emissions. 	<p>Two statements of common ground have been published alongside the local plan which set out the approach to cross boundary strategic matters. These matters are discussed but no specific cross boundary policy approaches have been identified.</p>	<p>No modifications suggested.</p>

Habitats Regulations Assessment

Main issues raised	Council's comments	Suggested modifications / actions
<p>Natural England (489) noted that the appropriate assessment stage of the Habitats Regulations Assessment (HRA) would be completed prior to examination. They pointed out that the HRA Screening Report had concluded that the local plan could result in likely significant effects on Habitats Sites from a number of threats / pressures. They stated that the council will need to satisfy itself that any adverse effects on the integrity of Habitats Sites can be mitigated or avoided where likely significant effects have been identified. They advised that they would be happy to discuss the HRA further in due course.</p>	<p>An appropriate assessment has been undertaken and published.</p>	<p>No modifications suggested.</p>

Vision: Building a better Bristol

Representations received (for both Vision and Aims & Objectives sections): 42

Object: 32 Support: 10

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Most representations came from individuals stating their objection to rapid transit network proposals, particularly for building an underground system. 	<p>The council considers that the Local Plan Publication Version contains a positive vision for the future development of Bristol and</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • Other representors suggested alternative visions, with most emphasising environmental and social sustainability considerations. • A number of representors from the housing development industry considered the Vision's reference to housing provision lacked ambition as was based on an inaccurate assessment of need. In contrast, CPRE Avon and Bristol (492) expressed concern at the focus on housing and sought a broader vision which emphasised climate change adaption and mitigation. • Specific matters for inclusion were suggested by respondents. For example, a stronger focus was sought by some on innovation, community involvement and design, economic growth and the development of new work space, while others sought reference to market housing, reducing car use, space for wildlife, less student accommodation and ensuring safety. • Several respondents thought the Vision lacked clarity. 	<p>addresses as succinctly as possible the key issues and needs facing the city, charting the expected progress on how they will be met. The vision is considered to be appropriate as drafted, forming part of a sound plan.</p>	

Aims and Objectives

Main issues raised	Council's comments	Suggested modifications / actions
<p>A number of respondents from the housing development industry / landowners disagreed with the objective to deliver at least 1,925 new homes a year as they considered it was based on an underestimate of need. In contrast, CPRE Avon and Bristol (492) thought the objective should be amended to refer to appropriate housing targets informed by climate, demographic, economic and environmental changes.</p>	<p>The plan aims to deliver at least 1,925 per year, with an aim to exceed this.</p>	<p>No modifications suggested.</p>
<p>An objective for the council to work with neighbouring authorities to accommodate unmet housing need was sought by Crest Nicholson Partnerships and Strategic Land (278).</p>	<p>This is a matter for the duty to cooperate. The city council has requested neighbouring authorities consider meeting unmet housing need.</p>	<p>No modifications suggested.</p>
<p>Inclusion of an objective to develop and renew workspace through intensification and delivery of new office, industry and distribution floorspace across the city was advocated by Royal London Asset Management (494).</p>	<p>The plan aims for the sustainable growth of the local economy with modern workplaces and digital infrastructure.</p>	<p>No modifications suggested.</p>
<p>Additional objectives relating to reducing commuter mileage and implementing the duty to cooperate were suggested by David Gray (303).</p>	<p>The plan's spatial strategy has a focus on accessibility in terms of development location. Statements of common ground describe the approach to the duty to cooperate.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
The '15-minute city' aim should be replaced according to Bristol Parks Forum (495) as they thought the concept was no longer supported by Government. The Forum favoured a 10-minute city aim.	The overall spatial strategy and approach to centres align with the <i>fifteen-minute city</i> concept.	No modifications suggested.
An aim for the local plan to establish a planning approach which contributes to the achievement of sustainable development in a sustainable manner was recommended by Bristol Parks Forum (495).	Sustainable development is embedded within the plan's vision and aims.	No modifications suggested.
National Highways (473) thought the objective relating to new infrastructure should be supported by evidence of its deliverability.	This section of the local plan sets out overall aims. There is an IDP which refers to infrastructure delivery.	No modifications suggested.
Support for the principles of the development strategy was made by University Hospitals Bristol and Weston NHS Foundation Trust (250). They considered that housing growth must be accompanied by sufficient new healthcare (and other social) infrastructure.	Support is noted. Policy IDC1 and other policy provisions address the infrastructure, facilities and services required to support development.	No modifications suggested.

Development strategy

Chapter-wide issues

Main issues raised	Council's comments	Suggested modifications / actions
<p>Adding text to each Development Strategy policy to ensure new development provides appropriate supporting healthcare infrastructure was requested by NHS Bristol, North Somerset & South Gloucestershire Integrated Care Board (468).</p>	<p>Policy IDC1 and other policy provisions address the infrastructure, facilities and services required to support development.</p>	<p>No modifications suggested.</p>
<p>The approach to the growth and regeneration areas lacked clarity and certainty regarding the provision of adequate employment land and uses according to Business West and the Bristol Property Agents Association (477). They sought strengthened policy to protect and provide employment uses in these areas, including floorspace targets and binding masterplans on the levels and type of employment space to be provided.</p>	<p>Policies E1 to E6A set out the approach to economic development land and the Development Strategy policies contain specific provisions regarding workspace, including the relationship of the policies with master plans.</p>	<p>No modifications suggested.</p>
<p>Concerns were expressed by Business West and the Bristol Property Agents Association (477) that there could be negative spatial</p>	<p>Policies E1 to E6A set out the approach to economic development land which include provision for office</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>implications resulting from the development strategy:</p> <ul style="list-style-type: none"> • They felt an imbalance in industrial land provision could result from providing new allocations at Avonmouth rather than other areas; • They feared a potential under-provision of city centre office floor space could lead to the loss of potential future occupiers to competitor cities. 	<p>development and land for industrial/distribution development.</p>	
<p>The potential displacement of established jobs from central and inner Bristol to more inaccessible locations was of concern to Bristol Civic Society (285). They felt it could have impacts on sustaining inclusive communities. Fears related to:</p> <ul style="list-style-type: none"> • increased commuting distances; • reduced local employment opportunities suitable for the skills held by people in these locations; • the potential ineffectiveness of the proposed spatial frameworks in the 	<p>The development strategy sets out the approach to securing new homes and workspace. Policies E1 to E6A set out the approach to economic development land which include provision for office development and land for industrial/distribution development.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
growth and regeneration areas to ensure adequate employment provision.		
Kevin Chidgey (345) was concerned about the potential negative impacts of the development strategy's area policies on existing businesses and jobs.	Policies E1 to E6A set out the approach to economic development land which include provision for office development and land for industrial/distribution development.	No modifications suggested.
Objection to the approach of the development strategy as a whole was made by Dandara Living Developments Ltd (430) and Redrow Homes Ltd (369) as they considered it was not based on objectively assessed housing need.	Policy H1 sets out the approach to meeting and exceeding the stated housing requirement.	No modifications suggested.
The lack of a modelling assessment of the impact of the development strategy on the strategic road network meant that National Highways (473) were unable to comment on the appropriateness of the strategy or its area policies.	The development strategy locates new residential and other forms of development within the urban area and with a focus on regeneration areas in the core of the city. This is consistent with national planning policy. The policy approach in the local plan provides sufficient opportunities or appropriate mitigation for Bristol City Council and other highway authorities impacted. The transport model is currently subject to its run process. A detailed report on the WERTM modelling will be issued shortly.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<p>A perceived lack of clarity on the scale of non-residential development proposed within each development strategy area was raised by National Highways (473), while Kevin Chidgey (345) also expressed concern about this in relation to the type and scale of development to be provided in these areas.</p>	<p>The development strategy locates new residential and other forms of development within the urban area and with a focus on regeneration areas in the core of the city. This is consistent with national planning policy.</p>	<p>No modifications suggested.</p>
<p>Clarity on the status of the blue shaded box and text on p.54 entitled 'Proposals adjacent to Bristol' was sought by North Somerset Council (188). They considered it did not accord with revised national planning policy or the approach being taken in the North Somerset Pre-Submission Local Plan which no longer contained the scale of growth close to the Bristol boundary as previously proposed.</p>	<p>The published North Somerset Local Plan proposes development on the edge of Bristol east of the A4174 Colliters Way. The text on page 54 is applicable in general terms to appropriate proposals which may come forward at locations adjoining the city.</p>	<p>No modifications suggested.</p>
<p>The requirements of Policy BG5 'Biodiversity and access to Bristol's waterways' should be more explicitly referred to within development strategy Policies DS1 - DS14 according to Dandara Living Developments Ltd (430).</p>	<p>Policy BG5 addresses biodiversity and access to waterways and is applicable to all locations where relevant.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Inconsistency between Development Strategy areas over how parks and green spaces were shown on the Policies Map was the view of Bristol Parks Forum (495), who pointed to Lockleaze where green areas were shown, and Western Harbour, where they were not.	Policy DS4 Western Harbour sets out the approach to open space within the policy area.	No modifications suggested.

Central Bristol

Policy DS1: Bristol City Centre

Representations received: 29

Object: 26

Support: 3

Main issues raised	Council's comments	Suggested modifications / actions
Strengthening the policy to require development to enhance the nature recovery network and provide green and blue infrastructure for climate resilience / adaptation was sought by Natural England (489).	Green/blue infrastructure and the nature recovery network are addressed by policies BG1-7.	No modifications suggested.
Detailed policy wording on the flood risk-related requirements of new development proposals was requested by the Environment	Flood risk is addressed in more detail for each area of growth and regeneration in the city centre by policies	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<p>Agency (465). Mention of flood risk mitigation was also sought, while concern was raised at the appropriateness of active ground floor uses in flood risk areas. The Agency also thought 'Agent of change' text should be included within the policy wording.</p>	<p>DS1A-5 and more generally by policies FR1-2, which include references to the Bristol Avon Flood Strategy.</p>	
<p>NHS Bristol, North Somerset & South Gloucestershire Integrated Care Board (468) thought the policy's reference to encouraging new hospital facilities should be expanded to include wider healthcare facilities such as GPs surgeries.</p>	<p>New healthcare facilities would be supported in any appropriate location. Contributions from new development to healthcare provision are made where appropriate through the community infrastructure levy or planning obligations. These are addressed by policy IDC1.</p>	<p>No modifications suggested.</p>
<p>A provision to ensure development proposals do not impede the consolidation and expansion of university and hospital facilities within their precincts was sought by the University of Bristol (487).</p>	<p>Inclusion of the precincts on the Policies Map will clarify the areas to which the policy applies. Main modification suggested.</p>	<p>Suggested main modifications: Policy DS1 p. 15, Policy text, 2nd para 5th bullet Continuing consolidation and expansion on the University of Bristol and Bristol Royal Infirmary sites (<u>as shown on the Policies Map</u>), at which the development of new</p>

Main issues raised	Council's comments	Suggested modifications / actions
		<p>facilities or the redevelopment and renewal of existing facilities will be encouraged. The development of university or hospital facilities elsewhere within the city centre will also be encouraged where they would accord with other relevant local plan policies;</p> <p>Policies Map</p> <p><u>Add university and hospital precincts.</u></p>
<p>Specific reference to student accommodation as a supported land use was requested by the University of the West of England (408), Abrdn Plc (440) and Bristol Alliance Limited Partnership (442). Centrica Combined Investment Fund c/o LaSalle Investment Management (429) sought this reference in the 'Broadmead' section.</p>	<p>The provision of student accommodation in the city centre is addressed by policy H7.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Reference to 'carefully managing' purpose-built student accommodation was objected to by Dandara Living Developments Ltd (430) as too negatively worded.	The provision of student accommodation in the city centre is addressed by policy H7.	No modifications suggested.
The inclusion of Hotwells, Cliftonwood and Western Harbour within the city centre boundary was objected to by several respondents including Hotwells and Cliftonwood Community Association (261) on the grounds that they were not considered to have 'city centre' characteristics.	The city centre boundary as defined by the policy represents an appropriate continuation of the existing local plan approach.	No modifications suggested.
Bristol Parks Forum (495) thought that the policy's ninth bullet point should specify that development will include a large multifunctional green park.	Specific references to parks, open spaces and other green infrastructure are made as appropriate for each area of growth and regeneration in the city centre by policies DS1A-5.	No modifications suggested.
Insufficient reference to protecting night time economy venues, such as music venues, night clubs and pubs, was the concern of NightWatch (368).	The protection of existing venues is addressed via the agent of change principle, and in general, as set out in policies SSE3 and HW1.	No modifications suggested.
Reference to cultural provision in the policy's 'Culture and diversity of uses' section was	The intentions of the policy approach are considered clear.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<p>objected to by Centrica Combined Investment Fund c/o LaSalle Investment Management (429) and AEW Real Estate Investment Trust (435) on the grounds of ambiguity.</p>		
<p>The expectation that the design of development should accord with local design guides and codes was opposed by AEW Real Estate Investment Trust (435) as they had not yet been published. They also thought that, as the codes and guidance will not be subject to independent examination, reference to development according with them was inappropriate as they will not have development plan status.</p>	<p>The reference to local design guides and codes is consistent with national planning policy and practice guidance.</p>	<p>No modifications suggested.</p>
<p>The requirement for new development to provide supporting infrastructure, services, community facilities and transport system improvements was objected to by Abrdn Plc (440) as they felt it could impact scheme viability.</p>	<p>Contributions from new development to infrastructure are made through the community infrastructure levy or planning obligations. These are addressed by policy IDC1.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>The Parochial Church Council of St Mary Redcliffe (399) thought St Mary Redcliffe church should be referenced as a key community facility and place of worship, while Science Creates (445) thought the policy should mention the provision of affordable industrial space.</p>	<p>Community facilities are addressed by policies CF1-2; places of worship fit the definition. St Mary Redcliffe church is a key community facility and place of worship.</p> <p>Affordable workspace is addressed by policy E6.</p>	<p>No modifications suggested.</p>
<p>University Hospitals Bristol and Weston NHS Foundation Trust (250) objected to the omission of the city centre hospital precinct being defined on the Policies Map. Similarly, the University of Bristol (487) objected to its sites relating to this policy not being shown on the Policies Map.</p>	<p>Inclusion of the precincts on the Policies Map will clarify the areas to which the policy applies. Main modification suggested.</p>	<p>Suggested main modifications:</p> <p>Policy DS1</p> <p>p. 15, Policy text, 2nd para 5th bullet</p> <p>Continuing consolidation and expansion on the University of Bristol and Bristol Royal Infirmary sites (<u>as shown on the Policies Map</u>), at which the development of new facilities or the redevelopment and renewal of existing facilities will be encouraged. The development of university or hospital</p>

Main issues raised	Council's comments	Suggested modifications / actions
		<p>facilities elsewhere within the city centre will also be encouraged where they would accord with other relevant local plan policies;</p> <p>Policies Map</p> <p>Add university and hospital precincts.</p>

Policy DS1A: Bristol City Centre – Broadmead, Castle Park and the Old City

Representations received: 17 Object: 15 Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
<p>The expectation that development should accord with the City Centre Development and Delivery Plan (CCDDP) was objected to by Centrica Combined Investment Fund c/o LaSalle Investment Management (429), AEW Real Estate Investment Trust (435) and Bristol Alliance Limited Partnership (442). They</p>	<p>The DDP a material consideration, given weight by a process of public consultation and prepared with regard to the emerging local plan policy.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
considered it unreasonable to assign development plan status to the CCDDP as it will not be subject to independent examination and could include provisions which impact scheme viability.		
Specific reference to student accommodation as a supported land use was sought by Centrica Combined Investment Fund c/o LaSalle Investment Management (429) and Bristol Alliance Limited Partnership (442).	Student accommodation is addressed by policy H7. A carefully managed increase in student accommodation is among the uses mentioned in the DDP.	No modifications suggested.
The appropriateness of requiring new development to include unspecified supporting infrastructure, services and community facilities was questioned by Bristol Alliance Limited Partnership (442) and AEW Real Estate Investment Trust (435) due to a lack of evidence that it would not impact scheme viability.	Expectations will be set appropriately in accordance with other policies of the local plan and with regard to the DDP.	No modifications suggested.
The provision seeking 10% of ground floor space for community groups was opposed by Dandara Living Developments Ltd (430), AEW UK Investment Management (458), AEW Real	The provision reflects the approach set out in policy CF1, applied to an area where a significant increase in intensity of use is proposed.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Estate Investment Trust (435), Fusion Group (396) and Bristol Alliance Limited Partnership (442) owing to insufficient evidence to demonstrate demand and appropriateness as well as potential impacts on scheme viability.		
The approach to the provision of student accommodation was objected to by the University of Bristol (487), in particular the policy's link with Policy H7 'Managing the development of purpose-built student accommodation' and its 750 bed space limit for Broadmead.	The approach reflects policy H7 – see issues and comments on that policy.	No modifications suggested.
The Environment Agency (465) thought that, as much of the policy area is in Flood Zone 2, reference should be made to development requiring an appropriate flood risk assessment and passing the sequential test.	The requirements for flood risk assessments and the sequential test are set out in national planning policy and confirmed in policy FR1.	No modifications suggested.
The expectation that development adjacent to Castle Park should contribute to the park's enhancement was opposed by AEW Real Estate Investment Trust (435) as they thought	Contributions from new development to infrastructure are made through the community infrastructure levy or planning obligations. These are addressed by policy IDC1 and will be sought in accordance with legislation.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
it did not accord with legislation concerning planning obligations.		
Strengthening the policy's 'Place Principles' with references to increasing green and blue infrastructure and natural features was sought by Natural England (489). They also felt the policy should expect nearby development to contribute to the maintenance of Castle Park to cope with additional visitor pressure.	The policy approach to green and blue infrastructure and parks is set out at policies BG1-BG7, GI A and GI1-GI4.	No modifications suggested.
The lack of a vision for St James' Barton roundabout was seen as a missed opportunity by Bristol Business Improvement Districts (423).	The policy sets out the overall approach to the development of the wider area.	No modifications suggested.
Reference to the presence and future retention of hospital facilities within the policy area was requested by University Hospitals Bristol and Weston NHS Foundation Trust (250).	The policy expects development to include the infrastructure, services and community facilities required to support the new development.	No modifications suggested.
The policy's approach to tall buildings in Broadmead was of concern to Kevin Chidgey (345).	As stated in the policy, proposals for tall buildings would be determined in accordance with policy DC2.	No modifications suggested.

Policy DS2: Bristol Temple Quarter

Representations received: 20

Object: 14

Support: 6

Main issues raised	Council's comments	Suggested modifications / actions
<p>Highlighting within the policy text the key green infrastructure and biodiversity opportunities and ambitions for each of the policy's sub-areas was requested by Natural England (489). They also felt the policy should require development in waterside locations to provide accessibility and biodiversity improvements.</p>	<p>The policy expresses the need for new and enhanced public realm and green infrastructure (including a continuous and accessible quayside walkway) and the improvement of open space in general terms. Further details will be addressed through the masterplan process.</p> <p>Development adjacent to waterways is addressed by policy BG5.</p>	<p>No modifications suggested.</p>
<p>Greater emphasis in the policy on the emerging masterplan was sought by Marble Mosaic Co. Ltd (371).</p>	<p>The policy expects development to accord with any approved development framework, masterplan and infrastructure delivery plan for the area.</p>	<p>No modifications suggested.</p>
<p>The 2,500 homes estimated capacity figure referred to in the policy's explanatory text was objected to by Marble Mosaic Co. Ltd (371). They considered the appropriate capacity figure would be identified as part of the masterplan process but that, if such a figure was to be included, it should be described as a minimum.</p>	<p>The capacity of 2,500 homes suggested by the explanatory text is an estimate. It is not a cap and would not impede the development of a higher number of homes where this is supported by service and infrastructure capacity.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Concern regarding the boundary of the policy area was raised by two representors:</p> <ul style="list-style-type: none"> • Change Real Estate and Abri (425) thought it should be amended to be consistent with the Enterprise Zone boundary. 	<p>The full extent of the enterprise zone, which was expanded in 2016, extends outside the central Bristol development strategy area and has a discontinuous boundary. Policy DS2 covers a larger area than the preceding Temple Quarter neighbourhood in the adopted Bristol Central Area Plan, principally to allow the addition of Mead Street, the largest area of the expanded enterprise zone with a contiguous boundary.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • Royal London Asset Management (494) pointed out that their 'Distillery' site on Temple Way (formerly known as Glassfields) fell within the policy area boundary but outside that covered by the Temple Quarter Development Framework (April 2023) boundary. They were concerned therefore that their site did not have up-to-date design guidance. They thought policy text was needed to make clear that sites outside the development framework or masterplan boundary should optimise density and make effective and efficient use of the land. 	<p>Optimised density and effective and efficient use of land are supported throughout the city by policies UL1 and UL2.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>The policy's requirement for development to be supported by a sequential test was objected to by Dandara Living Developments Ltd (430).</p>	<p>The application of a sequential test is consistent with national planning policy. The focused application of a sequential test within regeneration areas at risk of flooding reflects an appropriate continuation of the existing approach in the adopted Bristol Central Area Plan and the council's accompanying Flood Risk Sequential Test Practice Note.</p>	<p>No modifications suggested.</p>
<p>Reference to proposals being expected to accord with approved development frameworks was opposed by Unite Group Plc (457). They considered this inappropriate as it raised the decision-making status of framework documents which had not been subject to independent examination.</p>	<p>The framework is a material consideration, given weight by a process of public consultation and prepared with regard to the emerging local plan policy.</p>	<p>No modifications suggested.</p>
<p>The policy's provision that individual development proposals should not prejudice the comprehensive regeneration of the area was objected to by Unite Group Plc (457). They thought this had the potential to stifle development particularly due to the fractured nature of landownership in the area.</p>	<p>The provision is necessary to deliver the regeneration objectives for the area and represents the appropriate continuation of an existing approach in policies DM27 and BCAP34 of the existing local plan.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
A lack of information on how financial contributions to flood defences would be calculated concerned Unite Group Plc (457) owing to the potential impacts on scheme viability.	The most appropriate physical or financial contribution to the flood defence strategy will vary by site. The Bristol Avon Flood Strategy is addressed by policy FR2.	No modifications suggested.
Including text which supported the intensification or adaptive re-use of existing buildings for alternative uses was requested by CBRE Investment Management (471).	The intensification or adaptive re-use of existing buildings would be supported by this and other policies of the local plan.	No modifications suggested.
Specific text to ensure the setting of Temple Meads station was safeguarded by development proposals was sought by Historic England (476).	Conserving and enhancing the setting of heritage assets is addressed by policy CHE1.	No modifications suggested.

Policy DS3: St Philip's Marsh

Representations received: 19

Object: 16

Support: 3

Main issues raised	Council's comments	Suggested modifications / actions
The inclusion of specific requirements and targets for green and blue infrastructure in the policy area was sought by Natural England	The policy expresses the need for provision of appropriate green infrastructure and open space in general terms, while specific reference is made to enhancing Sparke	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
(489), who also thought the policy should require greenspaces to be biodiverse and contribute to the city's nature networks.	Evans Park. Further details will be addressed through the masterplan process. Biodiversity and nature recovery are addressed by policies BG1-7.	
A lack of clarity regarding the scale of development proposed at St. Philip's Marsh was raised by National Highways (473). They were concerned that, as the quantum of development had not been defined, the impact on the strategic road network could not be determined.	The development strategy locates new residential and other forms of development within the urban area and with a focus on regeneration areas in the core of the city. This is consistent with national planning policy. The policy approach in the local plan provides sufficient opportunities for appropriate mitigation for Bristol City Council and other highway authorities impacted. The transport model is currently subject to its run process.	No modifications suggested.
Bristol Parks Forum (495) thought that the policy should specify that development will include a large multifunctional green park which was both publicly accessible and owned.	The policy expresses the need for provision of appropriate green infrastructure and open space in general terms, while specific reference is made to enhancing Sparke Evans Park. Further details will be addressed through the masterplan process.	No modifications suggested.
Reference to fluvial flooding in the policy text was requested by the Environment Agency (465).	References to flood risk within the policy address both fluvial and tidal flooding.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Rather than the area being regenerated to complement the development of the adjacent Bristol Temple Quarter, St Philip's Marsh Community Group (305) favoured a mixed-use approach which complemented the evolving nature of the industrial, business and commercial use of the area.	The policy sets out the approach to regeneration of the area.	No modifications suggested.
Detail concerning the financial arrangements and timeframes for the delivery of the strategic flood mitigation works referred to in the policy was sought by Structadene (455) and Conygar Bristol Ltd (403).	The interactions between development and the Bristol Avon Flood Strategy are addressed in more detail by policy FR2.	No modifications suggested.
The policy's reference to ensuring the number of jobs supported by the area is increased was questioned by Structadene (455) regarding how it would be applied in assessing individual proposals.	Further details will be addressed through the masterplan process.	No modifications suggested.
Improved labelling of the sub-areas shown on the map accompanying the policy was sought by Structadene (455).	The policy approach reflects aspects of the framework / emerging masterplan.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<p>To emphasise the role of the masterplan process, the removal of wording relating to the proposed land uses for the policy's sub-areas was advocated by Structadene (455) or, alternatively, amending it to ensure greater flexibility. Dandara Living Developments Ltd (430) were similarly concerned, considering the proposed uses were not justified due to the absence of a strategic sequential test.</p>	<p>The policy approach reflects aspects of the framework / emerging masterplan.</p>	<p>No modifications suggested.</p>
<p>The policy provision that new development should facilitate and contribute towards the delivery of eastern access to Temple Meads Station was questioned by Structadene (455) on the grounds of a lack of clarity owing to the eastern access not being within the St Philip's Marsh policy area.</p>	<p>Noted. The eastern access is already under construction.</p>	<p>No modifications suggested.</p>
<p>Reference to the need for a comprehensive approach to traffic management and connectivity was sought by Structadene (455).</p>	<p>Transport improvements are referenced by the policy. Transport impacts are addressed by policies T1-T6.</p>	<p>No modifications suggested.</p>
<p>Within the North West St Philip's Marsh section, specific reference to support for residential and student accommodation</p>	<p>Student accommodation is addressed by policy H7. Student accommodation and workspace are among the uses mentioned in policy DS3.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>development was requested by Dandara Living Developments Ltd (430) and Structadene (455). Similarly, Cubex Ltd (453) thought text which supported development associated with the University of Bristol's Enterprise Campus should be specified, such as student accommodation and workspace.</p>		
<p>Within the South St Philip's Marsh section, specific policy support for purpose-built student accommodation was requested by Bristol Animal Rescue Centre (252), while Conygar Bristol Ltd (403) were concerned that the policy could be interpreted as directing a greater extent of development to riverside sites in comparison with non-riverside locations.</p>	<p>Student accommodation is addressed by policy H7. Student is among the uses mentioned in policy DS3.</p> <p>The policy would not impede development away from the riverside. Further details will be addressed through the masterplan process.</p>	<p>No modifications suggested.</p>
<p>Including policy text which would allow the relocation of existing businesses and / or community assets to a suitable alternative location was proposed by Bristol Animal Rescue Centre (252) in order to provide flexibility for redevelopment proposals.</p>	<p>The policy would not impede the relocation of existing businesses / community assets to a suitable alternative location.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Regarding the policy's provision that individual development proposals should not prejudice the comprehensive regeneration of the area, Bristol Animal Rescue Centre (252) considered the policy should include commentary on how individual applications submitted in advance of a masterplan would be assessed.	The provision is necessary to deliver the regeneration objectives for the area and represents the continuation of an existing approach in policies DM27 and BCAP34 of the existing local plan.	No modifications suggested.
Including references to the 'agent of change' principle in the policy text was requested by Bristol Animal Rescue Centre (252).	The agent of change principle is addressed by policy HW1.	No modifications suggested.
Policy wording to explain how individual proposals can come forward ahead of a comprehensive flood mitigation scheme was sought by Bristol Animal Rescue Centre (252).	Individual proposals will be assessed in accordance with national planning policy and policies FR1 and FR2.	No modifications suggested.
The policy's provision that individual development proposals should not prejudice the comprehensive regeneration of the area was objected to by Unite Group Plc (457). They thought this had the potential to stifle development particularly due to the fractured nature of landownership in the area.	The provision is necessary to deliver the regeneration objectives for the area and represents the appropriate continuation of an existing approach in policies DM27 and BCAP34 of the existing local plan.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
A lack of information on how financial contributions to flood defences would be calculated concerned Unite Group Plc (457) owing to the potential impacts on scheme viability.	The most appropriate physical or financial contribution to the flood defence strategy will vary by site. The Bristol Avon Flood Strategy is addressed by policy FR2.	No modifications suggested.
The presence of 132kV overhead power lines to the east of the policy area was highlighted by National Grid Electricity Distribution (South West) (84). They thought the policy should include reference to safeguarding the retained power lines and incorporating them sensitively into development proposals.	Further details will be addressed through the masterplan process.	No modifications suggested.
Changes to the policy's approach to affordable housing provision were sought by Conygar Bristol Ltd (403) to reflect evidence indicating lower sales values in comparison with other central Bristol growth and regeneration areas.	Affordable housing is addressed by policy AH1.	No modifications suggested.
A concern about the potential for existing jobs to be lost in the area was expressed by ElhPlan (404) who sought clarity on where they would be re-located.	Further details will be addressed through the masterplan process.	No modifications suggested.

Policy DS4: Western Harbour

Representations received: 34

Object: 32

Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
<p>Most representations objected to the policy due to concerns about flood risk; the ability to accommodate potentially large numbers of new homes; the possible loss of valued local features including community / recreational facilities, historic assets, character, wildlife sites / corridors, open spaces and views; and air and water pollution arising from new development. It was also felt that the policy was inappropriate because the area was not considered to have 'city centre' characteristics.</p>	<p>Further details on the regeneration of the area will be addressed through the masterplanning process.</p> <p>In relation to flood risk, the Bristol Avon Flood Strategy applies. This is addressed by policy FR2.</p>	<p>No modifications suggested.</p>
<p>Concerns were also widely expressed about a perceived lack of engagement with local residents in developing the policy, as well as the differing boundaries of the area shown in the Local Plan and emerging 'Harbour Hopes' masterplanning project.</p>	<p>The local plan and on-going master planning processes are subject of community involvement.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
A request for the policy to set clear principles to inform the proposed masterplan work was made by Sandra and Ian Fryer (316).	The policy sets a number of principles for the development of the area.	No modifications suggested.
A lack of clarity on the timing of proposed transport infrastructure improvements was a concern of Esteban Investment Ltd (420) in relation to its 'Longmoor Village' housing development at Ashton Vale and the associated mixed use scheme at Ashton Gate.	Further details will be addressed through the masterplan process.	No modifications suggested.
Reference in the policy to the area being at high risk of tidal flooding was sought by the Environment Agency (465). They also requested provisions to ensure new development was set back eight metres from watercourses and related structures.	The policy makes reference to flood risk and the provision of flood defences. The Bristol Avon Flood Strategy is addressed in more detail by policy FR2. Development adjacent to waterways is addressed by policy BG5.	No modifications suggested.
Specific policy wording in support of student accommodation was requested by the University of Bristol (487), who considered that such wording should not include a bed space limit.	Student accommodation is addressed by policy H7.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Strengthening the policy by identifying specific green and blue infrastructure and nature recovery ambitions was suggested by Natural England (489).	The policy expresses the need for provision of green infrastructure and open space in general terms. Further details will be addressed through the masterplan process. Biodiversity and nature recovery are addressed by policies BG1-7.	No modifications suggested.
Wording to ensure the retention and provision of wildlife corridors and stepping stones was sought by Bristol Parks Forum (495).	Biodiversity and nature recovery are addressed by policies BG1-7.	No modifications suggested.

Policy DS5: Frome Gateway

Representations received: 14

Object: 14

Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Concerns about flood risk were raised by the Environment Agency (465), who sought stronger policy wording regarding the requirements development proposals should meet.	The requirements for flood risk assessments and the sequential test are set out in national planning policy and confirmed in policy FR1. The focused application of a sequential test within regeneration areas at risk of flooding reflects an appropriate continuation of the existing approach in the adopted Bristol Central Area Plan and the council's accompanying Flood Risk Sequential Test Practice Note.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<p>Including in the policy the Frome Gateway Regeneration Framework's target for providing one hectare of new open space was requested by Natural England (489), along with reference to the expected green infrastructure enhancements and how these would be designed in consultation with the local community.</p>	<p>The policy expresses the need for provision of green infrastructure and open space in general terms, while specific reference is made to enhancing the river corridor. The framework provides the additional detail.</p>	<p>No modifications suggested.</p>
<p>Reference to a 500 bed space limit for student accommodation was objected to by Orangestar Capital (Globe Bristol) Ltd (441) and Dandara Living Developments Ltd (430) on the grounds of not meeting identified need. The latter representor also considered the limit inflexible and inconsistent with the policy approach of other growth and regeneration areas.</p>	<p>Student accommodation is addressed by policy H7.</p>	<p>No modifications suggested.</p>
<p>The reference to an estimated 1,000 homes capacity of this area was opposed by Dandara Living Developments Ltd (430) as it was considered inconsistent with the approach to other growth and regeneration areas.</p>	<p>The capacity of 1,000 homes suggested by the explanatory text is an estimate. It is not a cap and would not impede the development of a higher number of homes where supported by service and infrastructure capacity.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
The requirement for three and four bedroom homes was objected to by Dandara Living Developments Ltd (430) due to concerns about a lack of evidence and inconsistency with similar area policies where mix was not specified.	The mix of homes suggested in the explanatory text reflects the regeneration framework.	No modifications suggested.
The policy's requirement for development to be supported by a sequential test was objected to by Dandara Living Developments Ltd (430). This was on the basis of a perceived inconsistency with references to development being in accordance with the regeneration framework which would identify appropriate land uses.	The application of a sequential test is consistent with national planning policy. The focused application of a sequential test within regeneration areas at risk of flooding reflects an appropriate continuation of the existing approach in the adopted Bristol Central Area Plan and the council's accompanying Flood Risk Sequential Test Practice Note.	No modifications suggested.
A lack of reference to support for build to rent housing was of concern to Dandara Living Developments Ltd (430), who felt it was inconsistent with the approach taken in Policy DS3 'St Philip's Marsh' where it was specified.	Build to rent housing is addressed by policy BTR1 which is applicable to development in any location.	No modifications suggested.
Greater prominence and reference to the Old Market Quarter Neighbourhood Development Plan was sought by the Old Market	The explanatory text makes reference to the neighbourhood plan, and its boundary is shown on the Policies Map.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Community Association (233). Dandara Living Developments Ltd (430) thought that reference to development being consistent with the neighbourhood plan should also state that this will only be the case where the neighbourhood plan remains up to date.	The status and weight of neighbourhood plans, including whether they are considered up-to-date, is governed by legislation and national planning policy and guidance.	
Referring to the policy requirements of Policy BG7 'St Paul's Green Link' as they relate to Frome Gateway was advocated by Dandara Living Developments Ltd (430).	The St. Paul's Green Link is shown on the Policies Map and addressed by policy BG7 which also applies within the policy DS5 area.	No modifications suggested.
Concerns about impacts on scheme viability resulting from the expectation that new development should contribute to various policy provisions was raised by Orangestar Capital (Globe Bristol) Ltd (441).	Expectations will be set appropriately in accordance with other policies of the local plan and with regard to the regeneration framework.	No modifications suggested.
Specific reference to development including provision of light industrial, research and development and maker spaces was advocated by Science Creates (445).	The policy makes reference to provision of workspace for a range of employment uses. The regeneration framework provides further detail.	No modifications suggested.
The reference to logistics provision adjacent to M32 Junction 3 was questioned by ElhPlan	The reference to logistics provision reflects the regeneration framework.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
(404), who considered it should be focussed in St Philip's Marsh using rail connections.		
A concern about the potential for existing jobs to be lost in the area was expressed by ElhPlan (404) who sought clarity on where they would be re-located.	The policy references the provision of workspace. The regeneration framework addresses the retention or reprovision of jobs in the area as part of mixed-use development.	No modifications suggested.
Policy protection of cultural and 24 Hour economy venues and uses in this location was requested by NightWatch (368).	The protection of existing venues is addressed via the agent of change principle, and in general terms, as set out in policies SSE3 and HW1.	No modifications suggested.

East Bristol

Policy DS6: Lawrence Hill

Representations received: 5

Object: 5

Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
The affordable housing requirement referred to in the policy text was objected to by Frank Bruce and Company Limited (493) citing concerns about potential impacts on scheme viability.	Affordable housing is addressed by policy AH1.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Specific reference to development including provision of light industrial, research and development and maker spaces was advocated by Science Creates (445).	The policy makes reference to provision of workspace for a range of businesses uses. Further detail will be provided in any future development framework.	No modifications suggested.
Wording to ensure the retention and provision of wildlife corridors and stepping stones was sought by Bristol Parks Forum (495).	Biodiversity and nature recovery are addressed by policies BG1-7.	No modifications suggested.
An amendment to the 'development framework' reference was sought by Frank Bruce and Company Limited (493). They requested that the text allows for more than one such framework to be developed as they felt this could lead to a more effective approach to regeneration through the faster production of more targeted frameworks.	The wording would not preclude the development of multiple frameworks.	No modifications suggested.
The estimated housing capacity for the area provided in para. 3.2.8 was objected to by Frank Bruce and Company Limited (493) as they considered it too low.	The capacity of 1,500 homes suggested by the explanatory text is an estimate. It is not a cap and would not impede the development of a higher number of homes where supported by service and infrastructure capacity.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
A concern about the potential for existing jobs to be lost in the area was expressed by ElhPlan (404) who sought clarity on where they would be re-located.	The policy makes reference to provision of workspace for a range of businesses uses. Further detail will be provided in any future development framework.	No modifications suggested.

Policy DS7: Central Fishponds

Representations received: 10

Object: 9

Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
The need to understand the impacts on local infrastructure of higher housing densities was raised by Fishponds Community Planning Group (190). Similarly, Andrew Barclay (19) was concerned about the potential negative impacts of new housing on traffic congestion.	The policy refers to the provision of the infrastructure, services and community facilities required to support the new development.	No modifications suggested.
The importance of new development relating well to neighbouring streets in terms of scale and design was raised by Fishponds Community Planning Group (190), who were concerned at the appropriateness of possible tall buildings given the area's existing	Design and density are addressed by policies UL1, UL2, DPM1 and DC1-4. Tall buildings are specifically addressed by policy DC2.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
character of predominantly two-storey residential dwellings.		
Reference to an estimated 1,500 new homes capacity was objected to by Castel Ltd (382) who thought a minimum of 2,600 should be specified, while Central Fishponds Ltd (405) thought the figure for the Atlas Place area should be specified as at least 2,000. In contrast, Fishponds Community Planning Group (190) supported the 1,500 homes estimate provided it was based on an adequate assessment of the health and educational infrastructure required to support that homes growth.	<p>The capacity of 1,500 homes suggested by the explanatory text is an estimate. It is not a cap and would not impede the development of a higher number of homes where supported by service and infrastructure capacity.</p> <p>Support noted. The policy refers to the provision of the infrastructure, services and community facilities required to support the new development.</p>	No modifications suggested.
Castel Ltd (382) and Central Fishponds Ltd (405) thought that the policy's references to 'a regeneration framework' should be amended to 'the Atlas Place Framework'.	The general reference to a regeneration framework will allow the Atlas Place framework to be taken into account if endorsed by the council.	No modifications suggested.
Changes to the policy's approach to affordable housing and workspace provision were sought by Central Fishponds Ltd (405) to reflect evidence indicating lower sales values in	Affordable housing is addressed by policy AH1. Affordable workspace is addressed by policy E6.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
comparison with other growth and regeneration areas.		
Splitting the policy area into two was suggested by Central Fishponds Ltd (405) and Graphic Packaging International Ltd (436). They thought the 'Atlas Place' area associated with their sites should be separated from the wider policy area boundary north of the Railway Path.	Regeneration opportunities in Central Fishponds extend beyond the Atlas Place framework area, and it is considered appropriate for the local plan to view the area as a whole. Policy DS8 (Central Bedminster) is another example of an area of growth and regeneration that contains more than one sub-area / framework.	No modifications suggested.
Concerns about the impact on scheme viability regarding the policy requirement for new workspace was raised by Central Fishponds Ltd (405).	The expectation for an element of new workspace reflects the presence of existing jobs and workspace within the area.	No modifications suggested.
The policy's housing mix stipulations were considered superfluous by Central Fishponds Ltd (405) as they thought this issue would be addressed under Policy H4 'Housing type and mix'.	The references to housing mix complement policy H4.	No modifications suggested.
Specific reference to development including provision of light industrial, research and	The policy makes reference to provision of workspace for a range of businesses uses. Further detail will be provided in any future development framework.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
development and maker spaces was advocated by Science Creates (445).		
Wording to ensure the retention and provision of wildlife corridors and stepping stones was sought by Bristol Parks Forum (495).	Biodiversity and nature recovery are addressed by policies BG1-7.	No modifications suggested.
The reference to seeking an inner urban style density of 100 dwellings per hectares as a minimum was objected to by Graphic Packaging International Ltd (436). They felt this would require large-scale schemes which could prevent other policy provisions from being secured, namely an appropriate housing mix and a suitable response to surrounding context, which contained low rise residential development.	Design and density are addressed more generally by policies UL1, UL2, DPM1 and DC1-4. The suggested increase to 100dph reflects the scale of the opportunity available in Central Fishponds and its town centre location.	No modifications suggested.

South Bristol

Main issues raised	Council's comments	Suggested modifications / actions
University Hospitals Bristol and Weston NHS Foundation Trust (250) considered that	Contributions from new development to healthcare provision are made where appropriate through the	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
significant housing growth in South Bristol must be accompanied by sufficient new healthcare (and other) social infrastructure.	community infrastructure levy or planning obligations. These are addressed by policy IDC1.	
WeCanMake (446) sought supportive reference in this section to its project (and associated Community Design Code) which is aiming to meet housing need through the delivery of community-led one and two bedroom housing developments in private gardens.	The efficient use of land is supported throughout the city by policies UL1 and UL2. Policy BG6 concerns development in private gardens and sets out certain safeguards against inappropriate forms of development.	No modifications suggested.

Policy DS8: Central Bedminster

Representations received: 9

Object: 8

Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
Reference to a 1,600 bed space limit for student accommodation was objected to by the University of Bristol (487) and Dandara Living Developments Ltd (430) on the grounds of inflexibility, with the latter representor also considering the cap as not meeting identified need and being inconsistent with the policy	The approach reflects policy H7 – see issues and comments on that policy.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
approach of other growth and regeneration areas.		
A lack of reference to support for build to rent housing was of concern to Dandara Living Developments Ltd (430), who felt it was inconsistent with the approach taken in Policy DS3 'St Philip's Marsh' where it was specified.	Build to rent housing is addressed by policy BTR1 which is applicable to development in any location.	No modifications suggested.
The requirement for development to be supported by a sequential test was objected to by Dandara Living Developments Ltd (430). This was on the basis of a perceived inconsistency with references to development being in accordance with regeneration frameworks which would identify appropriate land uses.	The application of a sequential test is consistent with national planning policy. The focused application of a sequential test within regeneration areas at risk of flooding reflects an appropriate continuation of the existing approach in the adopted Bristol Central Area Plan and the council's accompanying Flood Risk Sequential Test Practice Note.	No modifications suggested.
Requiring proposals for sites previously used for business purposes to provide an appropriate form and amount of new workspace was opposed by Dandara Living Developments Ltd (430) as unjustified.	The approach reflects policy E6A – see issues and comments on that policy.	No modifications suggested.
The minimum density levels suggested in the explanatory text were objected to by Dandara	Design and density are addressed more generally by policies UL1, UL2, DPM1 and DC1-4. The suggested	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Living Developments Ltd (430) as they were considered too low to deliver the required amount of development.	minimum density of 120dph in this location is not a cap and would not preclude appropriately designed development of a higher density. Reference is also made to city centre style densities of 200dph or more.	
Reference in supporting text to development being guided by design criteria set out in the Urban Living supplementary planning document was objected to by Dandara Living Developments Ltd (430) as it was considered inconsistent with the approach to other growth and regeneration areas.	The Urban Living SPD is applicable throughout the city. The specific reference to it here reflects the significant change in character and increase in intensity that would arise from the regeneration proposals.	No modifications suggested.
Policy text which provides for the retention or relocation of existing businesses and tenants within the Central Bedminster Area was requested by S&B Automotive Academy (358).	The policy references the provision of workspace. The Whitehouse Street regeneration framework addresses the retention or reprovision of jobs in the area as part of mixed-use development.	No modifications suggested.
Text to ensure development is set back eight metres from the River Malago was sought by the Environment Agency (465).	Development adjacent to waterways is addressed by policy BG5.	No modifications suggested.
Policy protection for cultural and 24 Hour economy venues and uses in this location was requested by NightWatch (368).	The protection of existing venues is addressed via the agent of change principle, and in general terms, as set out in policies SSE3 and HW1.	No modifications suggested.

Policy DS9: Brislington

Representations received (for both Policy DS9 and Hengrove & Knowle West): 6

Object: 6 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
References to flood risk and the requirements for development to include a flood risk assessment and be set back eight metres from Brislington Brook were sought by the Environment Agency (465).	The area is not extensively affected by flood risk. Flood risk associated with Brislington Brook will be addressed by policy FR1 and national planning policy. Development adjacent to waterways is addressed by policy BG5.	No modifications suggested.
Specific reference to development including provision of light industrial, research and development and maker spaces was advocated by Science Creates (445).	The policy makes reference to provision of workspace for a range of business uses.	No modifications suggested.
Wording to ensure the retention and provision of wildlife corridors and stepping stones was sought by Bristol Parks Forum (495).	Biodiversity and nature recovery are addressed by policies BG1-7.	No modifications suggested.
A failure to allocate a site within the policy area for residential development was objected to by Industrial Gas Services SW (242).	The policy supports the provision of new homes in the area.	No modifications suggested.

Hengrove and Knowle West

Main issues raised	Council's comments	Suggested modifications / actions
References to the requirements for development to include a flood risk assessment and be set back eight metres from Brislington Brook and Pigeonhouse Stream were sought by the Environment Agency (465).	This section of the plan is for information. Policy BG5 refers to waterways.	No modifications suggested.
Additional wording to paragraph 3.3.22 to provide more information on the Knowle West Regeneration Framework was sought by Knowle West Regeneration Residents Planning Group / Knowle West Future (373).	This section of the plan is for information. Information about Knowle West regeneration will be updated on the Council's web site.	No modifications suggested.

Policy DS10: The Green Belt

Representations received: 32

Object: 9

Support: 23

Main issues raised	Council's comments	Suggested modifications / actions
Redrow Homes Ltd (369) objected to this policy on the grounds that it had not been informed by a comprehensive review of the Green Belt therefore it was unclear why	The permanence, and importance to the Government, of Green Belts is indicated in the NPPF. The local plan indicates that the removal of some specified sites from Green Belt is appropriate in exceptional circumstances.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
certain sites had been selected for removal from Green Belt designation.	The removal of other sites would be contrary to national planning policy, having regard to site specific matters. The Green Belt Assessment (EVEG01) provides useful information on the role and characteristics of locations within the Green Belt.	
A failure to allocate land at Yew Tree Farm for residential development was objected to by Redrow Homes Ltd (369), whereas support for maintaining its Green Belt designation was received from Friends of Novers Hill and Crox Bottom (Western Slopes) (155), Martyn Cordey (359), Fran Whitlock (110), Julia Halpenny (113), Sue Chubb (124), Nick Smith (293), Jim Mayger (97), Anna Tucker (98), June Goulding (103), Holly Tipping (104), Tim Marriner (105), Jasmine Beard (107), Thomas Lewis (111), Luke Collins (152), Catherine Withers (153), Bridget Bennett (154), Hilary Rydon (156), Richard Sawyer (165) and Alison Parker (333).	The representations are noted.	No modifications suggested.
Chapel Hill Homes (433) sought removal of land to the south of Ponderosa, Bridgwater Road from the Green Belt.	The removal of the site would be contrary to national planning policy.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Barrs Court Holdings Ltd (481) thought that land to the south of Ironmould Lane, Brislington should be removed from the Green Belt to accommodate housing development.	The removal of the site would be contrary to national planning policy.	No modifications suggested.
Objection to the policy's removal from the Green Belt of sites described under Policies DS11 and DS12 was made by Manor Woods Valley Group (63), while Save Ashton Vale Environment (SAVE) (235) objected to the proposed housing allocation on the area shown on p.29 of the Policies Map as 'DS11-1'.	The local plan indicates that the removal of some specified sites from Green Belt is appropriate in exceptional circumstances.	No modifications suggested.
Concerns that the exceptional circumstances justifying the removal of sites from the Green Belt for housing allocations had not been set out in the policy were raised by Esteban Investments Ltd (420) and Save Ashton Vale Environment (SAVE) (235).	The local plan indicates that the removal of some specified sites from Green Belt is appropriate in exceptional circumstances. Planning permission has been granted for development at Ashton Vale (Policy DS11 'Land at Ashton Vale (Longmoor Village)').	No modifications suggested.
Ensuring the policy reflects opportunities to use the greenbelt more positively for environmental and social benefits was recommended by Natural England (489).	The Local Plan proposes that a number of sites within the Green Belt are also designated as Local Green Space (Policy GI1), recognising the environmental and social role of those locations.	No modifications suggested.

Policy DS11: Development allocations – south west Bristol

Representations received: 31 Object: 31 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
<p>The proposed allocations were objected to by Friends of Novers Hill and Crox Bottom (Western Slopes) (155), Jim Mayger (97), Anna Tucker (98), Fran Whitlock (110), Julia Halpenny (113), Sue Chubb (124), Catherine Withers (153), Nick Smith (293), Manor Woods Valley Group (63), Martyn Cordey (359), June Goulding (103), Holly Tipping (104), Tim Marriner (105), Jasmine Beard (107), Thomas Lewis (111), Bridget Bennett (154), Hilary Rydon (156) and Richard Sawyer (165).</p>	<p>The local plan indicates that the removal of some specified sites from Green Belt is appropriate in exceptional circumstances.</p>	<p>No modifications suggested.</p>
<p>Re. the proposed housing allocation for land at Ashton Vale ('Longmoor Village'):</p> <ul style="list-style-type: none"> • ETM Contractors (349) pointed out that the related planning permission (ref. 21/03166/P) is subject to judicial review. • Esteban Investments Ltd (420) objected to the boundary shown on the Policies Map on the basis that it did not correspond 	<p>The local plan indicates that the removal of some specified sites from Green Belt is appropriate in exceptional circumstances. Planning permission has been granted for development at Ashton Vale (Policy DS11 'Land at Ashton Vale (Longmoor Village)').</p> <p>Detailed development matters are addressed by other relevant policies in the local plan.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>with the related planning permission boundary.</p> <ul style="list-style-type: none"> The Environment Agency (465) objected on flood risk grounds and due to the allocation being on a former landfill site. 		
<p>Re. the proposed housing allocation for land adjacent to Elsbert Drive, Bishopsworth:</p> <ul style="list-style-type: none"> The Wring Family Trust (383) requested policy wording to specify that the main vehicular access for the wider development area will be taken off the A38 / Bridgwater Road. Taylor Wimpey (347) sought clarification on the council's expectations regarding the cross-boundary development framework or masterplan. They favoured wording which allowed this to be produced informally by themselves as the site landowner and the landowner of the adjoining site in North Somerset, rather than being formally approved by the council. 	<p>The local plan indicates that the removal of some specified sites from Green Belt is appropriate in exceptional circumstances.</p> <p>Detailed development matters are addressed by other relevant policies in the local plan.</p> <p>It is appropriate for development to have regard to residential amenity.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • Taylor Wimpey (347) objected to the requirement that development should address the residential amenity of existing Elsbert Drive homes as unnecessary as the issue would be covered by other Local Plan policies. • Taylor Wimpey (347) opposed the reference to development according with all relevant local plan policies on the basis of a lack of justification and inconsistency with the approach taken for other allocations. • North Somerset Council (188) considered that it would be useful if the exceptional circumstances could be clarified for proposing to release this land from the Green Belt. • North Somerset Council (188) also considered that the co-ordinated masterplanning of the allocation site and that adjoining in North Somerset would need to address areas where the policy context within North Somerset and Bristol 		

Main issues raised	Council's comments	Suggested modifications / actions
<p>is different, such as affordable housing provision.</p> <ul style="list-style-type: none"> Natural England (489) considered that any future planning application should be informed by adequate assessments of impacts on bats and the North Somerset and Mendip Bats Special Area of Conservation 		
<p>A failure to allocate for housing Green Belt land adjoining the dwelling known as Ponderosa, Bridgwater Road was objected to by Chapel Hill Homes (433).</p>	<p>The removal of this site would be contrary to national planning policy.</p>	<p>No modifications suggested.</p>

Policy DS12: New neighbourhood – Bath Road, Brislington

Representations received: 26 Object: 24 Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
<p>Objections to the proposed development allocation were made by Friends of Novers Hill and Crox Bottom (Western Slopes) (155), Jim Mayger (97), Anna Tucker (98), Catherine</p>	<p>The local plan indicates that the removal of some specified sites from Green Belt is appropriate in exceptional circumstances.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Withers (153), Hilary Rydon (156), Fran Whitlock (110), Julia Halpenny (113), Sue Chubb (124), Nick Smith (293), John Courtney, June Goulding (103), Holly Tipping (104), Tim Marriner (105), Jasmine Beard (107), Thomas Lewis (111), Bridget Bennett (154), Richard Sawyer (165) and Martyn Cordey (359).		
Horizon Homes (412) (owners of part of the area proposed for allocation) considered there was a strong case for increasing the proposed capacity of the site. They also thought the part of the allocation they own could proceed in advance of the remaining part of the site.	The estimated capacity is appropriate. A comprehensive approach to the development of the area is appropriate.	No modifications suggested.
Extending the boundary of the proposed allocation to include land north of the Bath Road was requested by Claverton Healthcare Ltd (206).	The removal of this site would be contrary to national planning policy.	No modifications suggested.
References to the adjacent former landfill site, the flood risk-related requirements development should meet and ensuring development was set back eight metres from	These matters are addressed in other policies.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Brislington Brook were sought by the Environment Agency (465).		
Setting out the requirements for the minimum quantum of open space / green infrastructure that developments at this location will be expected to deliver was recommended by Natural England (489).	These matters are addressed in other policies.	No modifications suggested.
Regarding the reference in para. 3.3.34 to the potential relocation of the Brislington Park & Ride to land near Hicks Gate Roundabout, Bath and North East Somerset Council (496) noted that this land currently lies in the Green Belt. Such a relocation would therefore be contingent upon exceptional circumstances to justify removal of the land from the Green Belt to support improved transport facilities.	The comments are noted.	No modifications suggested.

North Bristol

Policy DS13: Lockleaze

Representations received: 2

Object: 2

Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
The presence of 132kV overhead power lines to the west of the policy area was highlighted by National Grid Electricity Distribution (South West) (84). They thought the policy should include reference to safeguarding the retained power lines and incorporating them sensitively into development proposals.	The proposals in the policy will not prejudice the retention of high-tension power lines. The presence of existing power lines will be addressed by planning applications and masterplans as required.	No modifications suggested.
Text to ensure development is set back eight metres from the Horfield Brook and directed to Flood Zone 1 where possible was sought by the Environment Agency (465).	Development adjacent to waterways is addressed by policy BG5.	No modifications suggested.

Policy DS14: Central Southmead

Representations received (for both Policy DS14 and Lawrence Weston): 1

Object: 1 Support: 0

No main issues identified.

Lawrence Weston

Main issues raised	Council's comments	Suggested modifications / actions
The Environment Agency (465) were concerned about a lack of reference to flood	This section of the plan is for information. Flood risk is addressed by policy FR1 and national planning policy.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
risk as they thought large areas of Lawrence Weston were in Flood Zones 2 and 3, within which there should be no development unless the sequential test has been met with a suitable flood risk assessment.		
As the area also includes the former Saltmarsh Drive and the University Playing Fields landfill sites, the Agency also advised that investigations would be needed into the presence of landfill gas and ground stability before any development takes place.	Comments are noted. The local plan contains a policy approach to contaminated land.	No modifications suggested.

Infrastructure and Developer Contributions

Policy IDC1: Development contributions and CIL

Representations received: 17

Object: 15

Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
Including within the policy text references to the legislative tests that relate to the use of planning obligations was sought by Dandara Living Developments Ltd (430),	The tests are set out within legislation. The policy is consistent with the NPPF. A very similar policy is included within the current local plan – Policy BCS11.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Gloucestershire County Cricket Club (447), Sovereign Network Group (461), AEW UK Real Estate Investment, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (482).		
In connection with the development contributions to be sought by this policy, concerns about the Local Plan Viability Assessment evidence base document were raised by the Home Builders Federation (414), Dandara Living Developments Ltd (430) and NHS Bristol, North Somerset & South Gloucestershire Integrated Care Board (468).	A very similar policy is included within the current local plan – Policy BCS11.	No modifications suggested.
Clarification on the policy's reference to 'geographically or functionally' and whether this referred to on-site or off-site mitigation was sought by Dandara Living Developments Ltd (430).	The same wording is included within the current local plan – Policy BCS11.	No modifications suggested.
A failure of the policy to refer to how viability review or viability testing can be used to support planning applications was objected to by Frank Bruce and Company Limited (493).	The references are not required for this policy.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Concerns were raised by Hotwells and Cliftonwood Community Association (261) on the amount of financial contributions that would be received from development proposals in Western Harbour and whether they would be spent on needs agreed by the local community.	Financial contributions arising from community infrastructure levy would be secured in accordance with regulations. The policy embeds expectations regarding the provision of facilities and links development to agreed masterplanning.	No modifications suggested.
A lack of clarity on what contributions would be sought was of concern to Dominic Hogg (448) and Dandara Living Developments Ltd (430), who considered reference to the Planning Obligations SPD was inappropriate given it was published in 2012.	Bristol is a CIL charging authority. The SPD will be updated as required.	No modifications suggested.
Reference to the Bristol Avon Flood Strategy and its related policy (Policy FR2) was sought by the Environment Agency (465).	The Bristol Avon Flood Strategy is referred to in Policy FR2.	No modifications suggested.
Reference to heritage asset improvements was suggested by Historic England (476).	The policy refers generally to infrastructure, services and facilities needed.	No modifications suggested.
The expectation that new development should contribute to the management of existing greenspaces and to the enhancement	The policy refers generally to infrastructure, services and facilities needed. Other policies deal specifically with open space for recreation and green infrastructure.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
of the green infrastructure network was expressed by Natural England (489).		

Policy SV1: Social value and inclusion

Representations received: 14 Object: 12 Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
Concern that this policy was inconsistent with national planning policy was raised by McCarthy Stone (300) and Elizabeth Blackwell Properties Ltd (189).	The policy is consistent with national policy. Similar policies are contained within adopted local plans elsewhere; for example: Salford Local Plan January 2023	No modifications suggested.
A perceived lack of clarity in the policy was objected to by Elizabeth Blackwell Properties Ltd (189), Dandara Living Developments Ltd (430), Dominic Hogg (448), Orangestar Capital (Globe Bristol) Ltd (441), Argo Real Estate Management Ltd (491) and Fusion Group (396).	See above.	No modifications suggested.
Insufficient evidence to justify the policy was of concern to Elizabeth Blackwell Properties Ltd (189).	See above	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Objection on the grounds that the policy was overly onerous was made by the Home Builders Federation (414) and Elizabeth Blackwell Properties Ltd (189).	See above	No modifications suggested.
Concern about how the implementation of the policy would be monitored was raised by Orangestar Capital (Globe Bristol) Ltd (441), Argo Real Estate Management Ltd (491) and Yara Capital (426).	See above.	No modifications suggested.
Strengthening the policy to 'require' development proposals to be accompanied by social value strategies rather than 'be expected to' was advocated by Bristol Business Improvement Districts (423).	The wording clearly sets out the expectations of the policy.	No modifications suggested.
Specific reference in the policy to development proposals which affect the '24 Hour economy ecosystem' was sought by NightWatch (368).	This is a general policy and reference to a specific matter is not required for it to be effective.	No modifications suggested.

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

Policy UL1: Effective and efficient use of land

Representations received: 29

Object: 19

Support: 10

Main issues raised	Council’s comments	Suggested modifications / actions
<p>Concern that the policy was not in accordance with the 'Achieving appropriate densities' section of the National Planning Policy Framework (December 2023) was raised by Sovereign Network Group (461), AEW UK Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (478).</p>	<p>The policy is considered to be consistent with national planning policy and guidance which prioritises development of appropriate densities based on an area’s characteristics.</p>	<p>No modifications suggested.</p>
<p>Removal of references to the Urban Living Supplementary Planning Document was sought by some representors:</p> <ul style="list-style-type: none"> • Sovereign Network Group (461), AEW UK Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (478) considered it dated, 	<p>Policies UL1 and UL2 address how land will be used efficiently in the city. Paragraph 5.3 is a factual statement that the council has prepared a supplementary planning guidance document on urban living that provides further guidance on making successful places at higher densities and explanatory paragraph 5.8 notes that the document sets out factors which influence the optimum density for a development site.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>inconsistent with national planning policy, not tested for its impact on development viability and not subject to independent examination. They also considered the document underpinned requirements in the policy and thought this inappropriate.</p> <ul style="list-style-type: none"> • Dandara Living Developments Ltd (430) questioned whether it was fit for purpose for supporting the policy's implementation. • Dominic Hogg (448) considered it to be a design code which was not compliant with national planning policy. 		
<p>A lack of clarity in the policy wording was raised by Dandara Living Developments Ltd (430), CPRE Avon and Bristol (492), Dominic Hogg (448) and ElhPlan (404), e.g. 'under-used land' and 'optimum'.</p>	<p>The policy is considered to be clear. The policy is focused in particular on inner urban areas and areas covered by the development strategy for which the plan provides indicative dwellings per hectare.</p>	<p>No modifications suggested.</p>
<p>While supportive in principle of the approach to utilise previously developed land, Redrow Homes Ltd (369) thought that additional greenfield sites should be allocated for</p>	<p>The allocations for greenfield land in the plan are appropriate.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
housing, particularly to assist in delivering more affordable homes.		
The absence of evidence to justify the policy was of concern to Dominic Hogg (448), who objected to it not being informed by a local design code.	The policy is an appropriate reflection of national policy for making efficient use of land. The local plan also contains design policies in Chapter 13.	No modifications suggested.
<p>'Locations for more intensive forms of development' section of policy text:</p> <ul style="list-style-type: none"> • A more fine-grained approach was sought by Elizabeth Blackwell Properties Ltd (189) in order to maximise opportunities for delivering housing. 	The development strategy includes fifteen areas enable a range of development opportunities across the city.	No modifications suggested.
<ul style="list-style-type: none"> • Giving more prominence in the policy text to the growth and regeneration areas in the Development Strategy policies was advocated by Elizabeth Blackwell Properties Ltd (189) and Central Fishponds Ltd (405). 	The local plan is considered to be clear in this regard.	No modifications suggested.
Diagram 5.1 showing indicative areas for the density of new development generated the following issues:	The city centre area shown on the diagram reflects the city centre boundary as defined in policy DS1.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Showing Hotwells and Cliftonwood on the diagram as an Inner Urban Area rather than part of the city centre was sought by Hotwells and Cliftonwood Community Association (261). Showing Western Harbourside as an Outer Urban Area rather than part of the city centre was advocated by Michael Tanner (281) 		
<ul style="list-style-type: none"> Showing the areas of growth and regeneration set out in the Development Strategy was recommended by Central Fishponds Ltd (405). 	These areas are shown on the policies map.	No modifications suggested.
<ul style="list-style-type: none"> Its usefulness was questioned by Frank Bruce and Company Limited (493), Sovereign Network Group (461), AEW UK Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (478). Concerns expressed 	Defining broadly appropriate densities across the city in line with proximity to the city centre, key centres and transportation infrastructure appropriate help ensure that locationally appropriate optimal densities are achieved.	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
<p>included fears that guidance on locations where certain densities will be appropriate was contrary to the concept of densities being optimised based on site and location specific considerations.</p>		
<ul style="list-style-type: none"> • Excluding parts of Shirehampton from areas shown as Outer Urban Area (More Intensive) was sought by John Knight (126) who was concerned about potential impacts on important open space and conservation considerations. • With reference to Fishponds being shown as Outer Urban Area (More Intensive), Fishponds Community Planning Group (190) thought it would not be realistic to support intensive development without an assessment of the transport needs of the area, and the area's inclusion within the city's strategic transport plan. 	<p>The diagram is considered to appropriately address the approach to density. Open space and nature conservation are addressed in other policies.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • The need for the diagram to take account of neighbouring authorities' centres and major public transport routes/corridors 	<p>Whilst the diagram does not include detailed information on transportation or centres in areas beyond the local</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
was raised by Elizabeth Blackwell Properties Ltd (189).	planning authorities boundaries, these have informed its content and the areas defined within it.	
<ul style="list-style-type: none"> Showing the boundaries of the Development Strategy policy areas (Policies DS1-14) on the diagram was requested by Central Fishponds Ltd (405). 	These are shown on the policies map.	No modifications suggested.
A failure of the policy to test alternative density strategies to deliver an increased quantum of new homes was objected to by Dandara Living Developments Ltd (430).	The policy aims to achieve effective and efficient use of land. The policy, in conjunction with UL2 is not prohibitive of higher densities.	No modifications suggested.
Additional reference to considerations which might affect the delivery of high density development, e.g. on-site green infrastructure provision relating to biodiversity net gain requirements, was sought by the Home Builders Federation (414).	The policies of the local plan as a whole are sufficiently detailed to set out any considerations which need to be addressed by a development proposal.	No modifications suggested.
<p>Natural England (489) were keen to emphasise the following:</p> <ul style="list-style-type: none"> as brownfield land can hold significant ecological value, ecological surveys must 	<p>Brownfield land can hold ecological value. Any surveys required to assess this and/or provide for mitigation of BNG would be detailed in other policies within the plan.</p> <p>Requirements for the provision and protection of green space are included in other policies within the local plan.</p>	No modifications suggest

Main issues raised	Council's comments	Suggested modifications / actions
<p>inform development proposals on such land.</p> <ul style="list-style-type: none"> As higher development densities could reduce access to private greenspace it will be important that policy for new development seeks to provide new greenspace, enhance existing greenspace and its accessibility or consider other measures like urban greening. 		
<p>David Gray (303) sought the addition of text to ensure the policy supported increased commuting on foot, bicycle and public transport in areas of imbalance between resident workers and jobs.</p>	<p>The development strategy areas and other policies in the local plan outline the need for development to support these means of transport. Policy UL1 has also been prepared in light of existing public transportation infrastructure.</p>	<p>No modifications suggested.</p>
<p>Change Real Estate and Abri (425) considered the policy to be unsound because it felt the boundary of the Bristol Temple Quarter Policy (Policy DS2) had not been drawn correctly. By excluding existing site allocations such as Land at Bath Road, west of Totterdown Bridge, it felt that Policy UL1 'Effective and efficient use</p>	<p>The boundaries shown in the policy are appropriate. Any development allocations such as BSA1101 are provided with an indicative estimated capacity which is appropriate to the site characteristics but which are not a cap.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
of land' would not be effective in delivering the optimum density of development.		
Specifying Lawrence Hill as a location where City Centre-type densities may be appropriate was suggested by Frank Bruce and Company Limited (493).	The indicative density for of Lawrence Hill is considered appropriate.	No modifications suggested.
Support for the policy was received from Abri (163), Argo Real Estate Management Ltd (491), Fusion Group (396), Gloucestershire County Cricket Club (447), Orangestar Capital (Globe Bristol) Ltd (441), Structadene (455) and Yara Capital (426).	The support for the policy is noted.	No modifications suggested.

Policy UL2: Residential densities

Representations received: 18 Object: 15 Support: 3

Main issues raised	Council's comments	Suggested modifications / actions
Concerns that the policy could lead to a predominance of multi-storey apartment buildings at the expense of meeting the full range of housing needs, types and tenures	The policy, whilst providing minimum residential densities in a variety of locations, is sufficiently flexible to ensure that the full range of housing needs, types and tenures can be provided.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
were raised by the Home Builders Federation (414) and Persimmon Homes Severn Valley (450).		
Fears that the implementation of the policy could prejudice the delivery of other important planning objectives such as good design, open space and biodiversity net gain requirements were cited by the Home Builders Federation (414) and Persimmon Homes Severn Valley (450).	Other policies in the local plan address the matters referred to.	No modifications suggested.
Providing greater flexibility by allowing site specific matters to be considered when assessing appropriate density was sought by the Home Builders Federation (414).	The policy provides appropriate flexibility.	No modifications suggested.
Concern that the policy was not in accordance with the 'Achieving appropriate densities' section of the National Planning Policy Framework (December 2023) was raised by Sovereign Network Group (461), AEW UK Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment	The policy is consistent with national planning policy and guidance which prioritises development of appropriate densities based on an area's characteristics.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Fund c/o LaSalle Investment Management and Taylor Wimpey (478).		
Objection to the expected minimum densities referred to in the policy was made by Dandara Living Developments Ltd (430) on the grounds they were considered too low. They felt they did not reflect the higher densities that have been achieved by development in recent years, as evidenced in the Bristol Urban Potential Assessment.	The densities provided are minimums. The policy also includes an expectation that major development will typically provide higher densities.	No modifications suggested.
Criticisms that the policy's references to 'suggested minimum' densities were too negatively worded were made by Elizabeth Blackwell Properties Ltd (189) and Gloucestershire County Cricket Club (447). In the context of unmet housing need they felt the approach should be to explore the maximum density possible on a site.	The policy's approach to indicating minimum density is appropriate.	No modifications suggested.
The suggested minimum densities set out in the table within the policy text provoked several responses:	The policy's approach to indicating minimum density is appropriate.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • The need to review the density figures was suggested by: <ul style="list-style-type: none"> • Elizabeth Blackwell Properties Ltd (189), who thought it necessary to ensure they were appropriate for different scales of development, particularly smaller infill sites. • Persimmon Homes Severn Valley (450), to specifically facilitate the delivery of houses. 		
<ul style="list-style-type: none"> • The need to remove the table was advocated by Sovereign Network Group (461), AEW UK Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (478). They felt it was contrary to the approach of densities being based on site- and location-specific considerations, and that the areas referred to in the table were too broad to be useful for decision making purposes. 	<p>The policy's approach to indicating minimum density is appropriate.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Including St Philip's Marsh with Bristol City Centre in the table within the policy text was requested by Conygar Bristol Ltd (403). 	<p>The area's importance for future development has been set out in the development strategy policy DS3.</p>	<p>No modifications suggested.</p>
<p>Concerns about potential negative impacts arising from high density development (e.g. on character, heritage, traffic and transport) in certain locations were raised by two representors:</p> <ul style="list-style-type: none"> in the Western Harbour area (representation by Helena Hobbs (116)); in Fishponds (representation by Fishponds Community Planning Group (190)). 	<p>Considerations such as character, heritage and transport are appropriately addressed.</p>	<p>No modifications suggested.</p>
<p>ElhPlan (404) felt the policy would worsen inequality as they considered highest densities were being promoted in areas of highest deprivation. They thought higher densities should be located in non-deprived areas where available services and land uses could support such development.</p>	<p>The aim of the policy is to ensure higher density development is located in locations that are adequately served by transportation infrastructure and which support a sustainable pattern of development.</p>	<p>No modifications suggested.</p>

Housing

Policy H1: Delivery of new homes

Representations received: 85

Object: 66

Support: 19

Main issues raised	Council's comments	Suggested modifications / actions
<p>Method used to calculate housing requirement:</p> <ul style="list-style-type: none"> A failure to demonstrate in the policy or evidence base the exceptional circumstances for deviating from the standard method of calculating the housing requirement was objected to by representors from the housing development industry / landowners. They felt the full standard method figure should be used, while the Home Builders Federation (414) considered the aim should be to achieve higher than the standard method figure. 	<p>The council's 'Housing need and supply topic paper' sets out the Government's standard method figure (both the locally derived element and the additional 35% urban uplift). This is acknowledged as the housing need for Bristol, which is in excess of the housing requirement deliverable within the city boundary. Unmet housing need is a matter for the duty to co-operate.</p> <p>The SHLAA report sets out a thorough assessment of Bristol's capacity that supports the local plan housing requirement.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Choosing to depart from the standard method received support from CPRE Avon and Bristol (492) and a number of individual members of the public. 	<p>Support noted.</p>	<p>No modifications suggested.</p>
<p>Housing requirement figure:</p> <ul style="list-style-type: none"> Considered too low by representors from the housing development industry / landowners. They 	<p>The SHLAA report sets out a thorough assessment of Bristol's capacity that supports the local plan housing requirement.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>promoted instead higher levels of housing, for reasons including delivering more affordable homes. Conygar Bristol Ltd (403) and Central Fishponds Ltd (405) thought that a housing requirement below housing need may result in under-investment in infrastructure by service providers.</p>		
<ul style="list-style-type: none"> A lack of clarity in the policy concerning the overall housing requirement figure and consequent amount of unmet need was raised by Crest Nicholson Partnerships and Strategic Land (278), Gladman Developments (388), Dandara Living Developments Ltd (430) and National Highways (473). 	<p>The SHLAA report sets out a thorough assessment of Bristol's capacity that supports the local plan housing requirement.</p> <p>Unmet housing need is a matter for the duty to co-operate.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Sustainability appraisal: <ul style="list-style-type: none"> A perceived failure of the sustainability appraisal to assess reasonable alternatives that could support a higher housing requirement was objected to by Waddeton Park Ltd (406), Black Box Planning (428), Taylor Wimpey and Vistry Homes (488). 	<p>The SHLAA report sets out a thorough assessment of Bristol's capacity that supports the local plan housing requirement. The SHLAA assesses potential supply from a wide variety of sources. Given that Bristol's assessed capacity still falls short of housing need, there are limited alternatives for the SA to appraise.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Evidence to justify requirement: 	<p>The references are illustrative.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • References in the evidence base to past delivery rates were considered flawed by the Home Builders Federation (414) and Redrow Homes Ltd (369). They felt they entrenched previous under-delivery in estimates of future potential. 		
<ul style="list-style-type: none"> • Concerns about the capacity calculations informing the housing requirement were raised by representors from the housing development industry / landowners. These included: <ul style="list-style-type: none"> ▪ insufficient detail, e.g. absence of a Strategic Housing Land Availability Assessment and Five Year Housing Land Supply position statement; 	<p>The SHLAA report sets out a thorough assessment of Bristol's capacity that supports the local plan housing requirement.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> ▪ flawed calculations due to: <ul style="list-style-type: none"> • Insufficient sites allocated or insufficient reasoning given for non-allocation of previously promoted sites; 	<p>The 'Development Allocations and Designations Process Topic paper' sets out the process by which sites were allocated or previous allocations removed.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Density assumptions for development allocations and urban potential sites set too low; 	<p>Density assumptions are set at a level appropriate to different urban contexts. Higher density forms of development can be promoted, accompanied by detailed assessment.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Insufficient capacity assumed for growth and regeneration areas; 	<p>The SHLAA report sets out a thorough assessment of Bristol's capacity that supports the local plan housing requirement. The capacity for each area of growth and regeneration is assessed in detail with reference to the available information.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Not pursuing development allocations proposed at previous Local Plan consultation stages. 	<p>The 'Development Allocations and Designations Process Topic paper' sets out the process by which sites were allocated or previous allocations removed.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Concern that growth in student numbers had not informed housing need and / or was not accurately represented in the Local Housing Needs Assessment was raised by representors from the housing development industry and the two local universities. 	<p>The SHLAA makes an allowance for student housing. Student accommodation is addressed by policy H7.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> National Highways (473) considered that the transport evidence would need to reflect the scale of unmet housing need in neighbouring authorities, particularly relating to any impacts on the strategic road network. 	<p>The impact of meeting any unmet housing need in neighbouring authorities will be addressed as part of those authorities' local plan processes.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Delivery of requirement: <ul style="list-style-type: none"> Doubts about realistic delivery of significant elements of the identified capacity were raised by the Home Builders Federation (414) and Waddeton Park Ltd (406), citing the growth and regeneration areas, urban potential sites and small windfall sites in particular. 	<p>The SHLAA report sets out a thorough assessment of Bristol's capacity that supports the local plan housing requirement.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> CPRE Avon and Bristol (492) were not convinced of the requirement's deliverability overall and expressed concern about future encroachment on the Green Belt within and beyond Bristol. Similarly, Kevin Chidgey (345) felt the housing requirement and capacity estimates were ambitious and may exceed what is deliverable. 	<p>The SHLAA report sets out a thorough assessment of Bristol's capacity that supports the local plan housing requirement.</p> <p>The impact of meeting any unmet housing need in neighbouring authorities will be addressed as part of those authorities' local plan processes.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Omissions from policy:</p> <ul style="list-style-type: none"> • Policy should also cover: <ul style="list-style-type: none"> • affordable housing (representation by Abri Homes Ltd (163)) 	<p>The council's LHNA addresses the need for various housing types. Affordable housing is addressed by policy AH1.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • older people's housing (representation by Anchor (346)) 	<p>The council's LHNA addresses the need for various housing types. Older people's housing is addressed by policy H8.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • the need for different house types (representation by Taylor Wimpey (347), AEW UK Real Estate Investment Trust and Sovereign Network Group (461)) 	<p>The council's LHNA addresses the need for various housing types. Housing type and mix is addressed by policy H4.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • Allocating more small sites to support small developers was advocated by the Home Builders Federation (414). 	<p>The SHLAA report sets out a thorough assessment of Bristol's capacity that supports the local plan housing requirement. Sites are identified at a variety of scales, with a further citywide assumption made for small site windfalls. The effective and efficient use of land is addressed by policy UL1.</p>	<p>No modifications suggested.</p>
<p>Green Belt review:</p> <ul style="list-style-type: none"> • The need for the council to undertake a comprehensive Green Belt review to identify further 	<p>A Strategic Green Belt Assessment was carried out.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>housing capacity including potential cross-boundary development opportunities was urged by Copperfield (386), Gladman Developments (388), Waddeton Park Ltd (406), Redrow Homes Ltd (369) and LiveWest (245).</p>		
<p>Unmet housing need and the duty to cooperate:</p> <ul style="list-style-type: none"> Representors from the housing development industry / landowners noted that an unmet need had been identified irrespective of how the requirement had been calculated. Some considered that the council had failed in its duty to cooperate with neighbouring authorities on how Bristol's unmet would be accommodated by them. The absence of a statement of common ground which detailed an agreed approach to meeting the unmet need was noted in this regard. 	<p>A Statement of Common Ground has now been published.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Concerns that the displacement of unmet need to adjoining authorities would have an unreasonable impact on surrounding areas were raised by representations from ten individual members of the public. 	<p>The impact of meeting any unmet housing need in neighbouring authorities will be addressed as part of those authorities' local plan processes.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> South Gloucestershire (469) and Bath and North East Somerset Councils (496) concurred with the approach set out in para. 6.8 that the extent to which any of Bristol's unmet housing need could be met by neighbouring councils would be explored through the preparation of their respective local plans. 	Support noted.	No modifications suggested.
<ul style="list-style-type: none"> North Somerset Council (188) noted that they were not able to accommodate any of Bristol's unmet need. 	Noted.	No modifications suggested.
<p>Gladman Developments (388) and Redrow Homes Ltd (369) doubted that the plan would be adopted by 2025 and considered that the plan period should be extended to 2041 or later to ensure at least a fifteen year plan period.</p>	It is expected that the local plan will be adopted in Spring 2025.	No modifications suggested.
<p>Maximising housing capacity in the growth and regeneration areas was promoted by developers with a land interest in a number of these locations.</p>	The SHLAA report sets out a thorough assessment of Bristol's capacity that supports the local plan housing requirement. The capacity for each area of growth and regeneration is assessed in detail with reference to the available information.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<p>The following sites were suggested as suitable for housing and were promoted as development allocations: Woodgrove Road, Henbury; Queens Parade, city centre; Elm Tree Farm, Stapleton; Land at Golden Hill; the County Ground, Bishopston; Netham Road, St. George; and the previously allocated site at Brislington Meadows.</p>	<p>Additional sites promoted through representations are assessed for their future potential as part of the SHLAA report, but not where identified by the local plan as Local Green Space or Reserved Open Green Space or where the principle of development has already been determined, for instance by the grant of planning permission.</p>	<p>No modifications suggested.</p>
<p>Concerns about the future impact on the city of higher housing densities and more tall buildings were raised by CPRE Avon and Bristol (492), Knowle Neighbourhood Planning Group (372), Waddeton Park Ltd (406) and Kevin Chidgey (345).</p>	<p>Design and density are addressed by policies UL1, UL2, DPM1 and DC1-4. Tall buildings are specifically addressed by policy DC2.</p>	<p>No modifications suggested.</p>

Other suggested modifications (Policy H1)

Main issues raised	Council's comments	Suggested modifications/actions
<p><i>Issue identified by the council.</i></p>	<p>There is an error in the definition of the plan period. Main modification suggested to correct and clarify this.</p>	<p>Suggested main modification: Policy H1 P. 68, H1, para. 6.13</p>

		In first sentence delete 'ending 1st April ' – insert <u>31st March</u>
--	--	--

Policy AH1: Affordable housing provision

Representations received: 41 Object: 39 Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
<p>35% affordable housing requirement:</p> <ul style="list-style-type: none"> • Objection to a lack of flexibility to allow variation in provision on a site by site basis was raised Abrdn Plc (440); 	<p>The policy provides flexibility on how the 35% affordable housing expectation is achieved. This includes where necessary viability testing, to establish the maximum affordable housing proportion that can be delivered without public subsidy, and the use of other mechanisms to make up any shortfall against the 35% expectation.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • Excluding city centre development from the policy was sought by Legal and General (409); 	<p>The policy provides flexibility on how the 35% affordable housing requirement is achieved. This includes where necessary viability testing, to establish the maximum affordable housing proportion that can be delivered without public subsidy, and the use of other mechanisms to make up any shortfall against the 35% expectation.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • A city-wide requirement was inconsistent with the area-based percentages approach set out in the Local Plan Viability Assessment according to the Home 	<p>The nil subsidy contribution to the 35% affordable housing expectation is guided by area based %s (set out in para.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Builders Federation (414). Bristol Alliance Limited Partnership (442) also considered that the affordable housing percentages should reflect viability variations across the city;</p>	<p>6.21 of the explanatory text). These %s reflect local variations in viability.</p>	
<ul style="list-style-type: none"> Concerns over the requirement for proposals to be designed at the application stage to deliver 35% affordable housing were raised by Dandara Living Developments Ltd (430); 	<p>The approach is consistent with the expectation to deliver 35% affordable housing.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> A lack of clarity in the policy approach was objected to by Dandara Living Developments Ltd (430). They thought the requirement for 35% affordable housing should be stated followed by the expectation that development delivers the affordable housing percentages without public subsidy set out for the different areas but, where this is below 35%, to work with the council to deliver the shortfall through other mechanisms. Dominic Hogg (448) also considered that the affordable housing percentages sought 	<p>The expectations of the policy are clearly set out in the policy and explanatory text.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>without public subsidy should be set out in the main policy text rather than the explanatory text.</p>		
<p>Viability issues:</p> <ul style="list-style-type: none"> Concerns were raised by McCarthy Stone (300) that certain forms of older people's housing had not been fully viability tested, including retirement living and sheltered housing, to determine the appropriate levels of affordable housing contribution from these forms of development; 	<p>Viability issues are set out in the Bristol City Council: Local Plan Viability Assessment. The policy allows for viability issues to be taken into account.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> The Local Plan Viability Assessment did not fully consider the wide range of challenges and additional costs currently faced by developers according to the Home Builders Federation (414); 	<p>Viability issues are set out in the Bristol City Council: Local Plan Viability Assessment. The policy allows for viability issues to be taken into account.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Specific reference to the likelihood that viability issues will be an issue for a number of the growth and regeneration areas such as Lawrence Hill was sought by Frank Bruce and Company Limited (493); 	<p>Viability issues are set out in the Bristol City Council: Local Plan Viability Assessment. The policy allows for viability issues to be taken into account.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> The application of Local Housing allowance levels to cap all rented affordable housing tenures (set out in para. 6.34) could affect the viability of residential developments for older people according to Anchor (346). 	<p>Viability issues are set out in the Bristol City Council: Local Plan Viability Assessment. The policy allows for viability issues to be taken into account.</p>	<p>No modifications suggested.</p>
<p>Threshold approach:</p> <ul style="list-style-type: none"> Objection to the threshold approach being applied to the city centre only was made by Frank Bruce and Company Limited (493). They thought it should apply to Lawrence Hill and other central Bristol growth and regeneration areas; 	<p>The area based %s and threshold approach (set out in para. 6.21 of the explanatory text) have been informed by the Bristol City Council: Local Plan Viability Assessment.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Consideration to the expansion of the threshold approach to the city as a whole was advocated by Sovereign Network Group (461) and AEW Real Estate Investment Trust (435); 	<p>The area based %s and threshold approach (set out in para. 6.21 of the explanatory text) have been informed by the Bristol City Council: Local Plan Viability Assessment.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> The threshold approach should continue to be applied to the areas as currently set out in the Affordable Housing Practice 	<p>The area based %s and threshold approach (set out in para. 6.21 of the explanatory text) have been informed by the Bristol City Council: Local Plan Viability Assessment.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Note according to Orangestar Capital (Globe Bristol) Ltd (441);</p>		
<ul style="list-style-type: none"> • McCarthy Stone (300) sought further detail within the policy on the threshold approach. 	<p>The expectations of the policy are clearly set out in the policy and explanatory text.</p>	<p>No modifications suggested.</p>
<p>Proposed affordable housing tenure proportion:</p> <ul style="list-style-type: none"> • Concerns were raised by Windmill Hill and Malago Planning Group (174), Friends of Novers Hill and Crox Bottom (Western Slopes) (155) and 14 other individual respondents over the identified preference for 75% social rent affordable housing instead of retaining the proportion of 77% sought in the existing local plan. They felt retaining this percentage would ensure a greater quantity of affordable housing delivered would meet the needs of people on lower incomes. 	<p>The % sought for social rent has been informed by the total number of social rent homes needed and national policy expectations relating to affordable housing tenure.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Abri (163) considered that greater policy flexibility could be achieved if the identified preference for 75% social rent affordable housing could be expressed as 75% affordable homes for rent. South West Housing Association Planning Consortium (439) also expressed concern that the tenure mix sought did not include affordable rent and AEW Real Estate Investment Trust (435) considered that tenure requirements could be more flexible. The Home Builders Federation (414) also sought some flexibility in the tenure requirements to improve viability. 	<p>The policy provides for some flexibility in the tenure proportions sought.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Objections were raised by Anchor (346) over the preferred tenure split of 75% social rent affordable housing and 25% affordable home ownership. Instead, the tenure should be negotiated on a site by site basis. 	<p>The tenure %s sought have been informed by evidence of need and national policy expectations relating to affordable housing tenure.</p>	<p>No modifications suggested.</p>
<p>References to the Affordable Housing Practice Note:</p>	<p>The Affordable Housing Practice Note is not part of the submitted local plan. It explains the mechanism for the</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Clarification on whether the existing Practice Note or a replacement document would be used to provide guidance on the implementation of the policy was sought by Sovereign Network Group (461) and AEW Real Estate Investment Trust (435); 	<p>delivery of affordable homes in Bristol setting out the key principles and processes and will be updated as required.</p>	
<ul style="list-style-type: none"> Removal of reference to the Practice Note from the main policy text and relocation to the explanatory text was advocated by Legal and General (409). 	<p>Reference to relevant guidance within the policy text is considered appropriate.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> The reference in para. 6.24 to changes to affordable housing percentages made during the plan period being made through an updated version of the Practice Note was objected to by Dandara Living Developments Ltd (430). 	<p>A flexible approach reflecting any change to market circumstances is considered appropriate.</p>	<p>No modifications suggested.</p>
<p>Further detail within the policy on the affordable housing review mechanisms was sought by McCarthy Stone (300).</p>	<p>The expectations of the policy are clearly set out in the policy and explanatory text.</p>	<p>No modifications suggested.</p>
<p>Concerns were raised by Sovereign Network Group (461) and AEW Real Estate Investment</p>	<p>The shortfall mechanisms (set out in para. 6.25 of the explanatory text) are considered appropriate.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Trust (435) over the effectiveness of the shortfall mechanism relating to the seeking of funds for additional affordable housing (identified in para. 6.25, bullet point 3) if Homes England had not confirmed to Bristol City Council that such funding would be available.		
The flexible tenure approach to delivering affordable home ownership (either First Homes or shared ownership units) was supported by Sovereign Network Group (461) and South West Housing Association Planning Consortium (439). However, Dandara Living Developments Ltd (430) queried whether the approach was consistent with national policy.	The approach is considered consistent with national policy.	No modifications suggested.

Other suggested modifications (Policy AH1)

Main issues raised	Council's comments	Suggested modifications/actions
<i>Issue identified by the council.</i>	A main modification to the explanatory text is required to explain that other forms of residential development may be subject to different policies in the plan relating to the provision of affordable housing. This includes build to rent	Suggested main modification: Policy AH1

	housing where a different affordable housing percentage is sought.	p.70, para. 6.19 This policy applies to all residential development <u>unless otherwise indicated by other development plan policies</u> . Policy BTR1 'Build to Rent housing' sets out the approach to affordable housing in build to rent development.
--	--	---

Policy H2: Preventing the loss of residential accommodation

Representations received: 1 Object: 1 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Elizabeth Blackwell Properties Ltd (189) raised no objection to the policy but suggested that replacement homes could be in the form of non-C3 accommodation such as student accommodation or Houses in Multiple Occupation.	The policy does not preclude the replacement of homes with other non-C3 residential uses, however proposals for such uses, including student accommodation and HMOs, will be subject to other policies within the plan.	No modifications suggested.

Policy H4: Housing type and mix

Representations received: 11 Object: 9 Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
<p>The requirement to redress any harmful housing imbalance that exists in an area was objected to by Elizabeth Blackwell Properties Ltd (189). They felt this should not be used as a tool to restrict higher density development. Dandara Living Developments Ltd (430) also objected. They considered development should address identified housing needs rather than address historic issues.</p>	<p>The policy criterion supports the overall policy objective to ensure that all new residential development helps support the creation of mixed, balanced and inclusive communities. The wording of the criterion is similar to existing wording set out in policy BC18: Housing Type.</p>	<p>No modifications suggested.</p>
<p>Persimmon Homes Severn Valley (450) considered that the first criterion of the policy text should be re-worded to support the delivery of more houses which reflected evidence in the Local Housing Needs Assessment.</p>	<p>The city's housing requirement and expectations relating to housing delivery are set out in policy H1: Delivery of new homes - Bristol's housing requirement.</p>	<p>No modifications suggested.</p>
<p>Amendment to the policy text to clarify that housing mix requirements will be subject to viability testing was sought by AEW UK Investment Management (458).</p>	<p>Relevant issues relating to viability are set out in the Bristol City council: Local Plan Viability Assessment.</p>	<p>No modifications suggested.</p>

Policy H5: Self-build and community-led housing

Representations received: 18 Object: 18 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
<p>Provision of self-build / custom housebuilding and / or community-led housing:</p> <ul style="list-style-type: none"> • Objection to the 5% requirement on allocated sites and a proportion within growth and regeneration areas was made by Taylor Wimpey (347), the Home Builders Federation (414) and Dandara Living Developments Ltd (430). Concerns cited were the ability to optimise densities on sites with this form of housing present, practical construction considerations, viability and a lack of clarity over implementation. 	<p>The policy approach is consistent with national policy and practice guidance relating to legal duties concerned with increasing the availability of land for self-build and custom housebuilding.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • Taylor Wimpey (347) raised particular objection to the Elsbert Drive site allocation being identified for this form of development which is under the control of the respondent. 	<p>The policy approach is consistent with national policy and practice guidance relating to legal duties concerned with increasing the availability of land for self-build and custom housebuilding.</p>	<p>No modifications suggested.</p>
<p>'Community-led housing exception sites' section of policy text and the list of site types where community-led housing may be permitted:</p>	<p>The policy test applied to self-build and custom housebuilding is the same as the test applied in policy E5 relating to all uses that involve the loss of industrial and</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Taylor Wimpey (347) questioned the justification for why this particular type of housing would be allowed on Industry and Distribution Areas and not other housing; 	distribution floorspace/land within the Industry and Distribution Areas.	
<ul style="list-style-type: none"> WeCanMake (446) requested an additional site type be added to the list. They sought reference to the sub-division of large residential plots in low density areas where there is no harmful impact to the character and appearance of an area or to the amenity of existing development. 	The policies allow for appropriate developments of this nature.	No modifications suggested.
<ul style="list-style-type: none"> Objection to the inclusion of the 'Reserved Open Space' site type was made by Bristol Parks Forum (495) and Dominic Hogg (448). 	The justification for community-led exception sites is provided in the explanatory text to the policy.	No modifications suggested.
The proposed allocation of land at College Road, Fishponds for self-build, custom housebuilding or community-led housing was of concern to Fishponds Community Planning Group (190).	See council's comment on BDA1501. The allocation is considered appropriate.	No modifications suggested.

Policy H6: Houses in multiple occupation and other shared housing

Representations received: 24 Object: 20 Support: 4

Main issues raised	Council's comments	Suggested modifications / actions
<p>Diana Swain (216), Hampton Park and Cotham Hill Community Group (344), Leslie Cooper (215), Clifton Down Community Association (277), Merche Clark (260), Oakfield Residents Association (275) and Richmond Area Residents Association (370) requested that the full content of the existing 'Managing the development of houses in multiple occupation' Supplementary Planning Document (SPD) be brought into the local plan or that the existing SPD is considered alongside this policy in full but with particular regard to the sandwiching assessment (set out in section 4.1 of the SPD).</p>	<p>The explanatory text to the policy states that section 2 of the policy should be implemented with reference to guidance set out in the Managing the development of houses in multiple occupation SPD. The SPD provides detailed guidance on how to avoid a local imbalance of HMOs including imbalance resulting from a range of sandwiching scenarios.</p>	<p>No modifications suggested.</p>
<p>The existing local plan policy relating to Houses in Multiple Occupation should be retained according to Elizabeth Blackwell Properties Ltd (189), or greater flexibility provided by Policy H6.</p>	<p>An updated policy approach is required to manage issues relating to the development of HMOs.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
A lack of reference to / guidance on co-living accommodation was of concern to the Watkin Jones (437) and Dominus Real Estate (289).	The policies provide an appropriate context for the consideration of co-living.	No modifications suggested.

Other suggested modifications (Policy H6)

Main issues raised	Council's comments	Suggested modifications/actions
<i>Issue identified by the council.</i>	A main modification to the explanatory text is required to clarify the definition of the defined area referred to in section two of the policy.	Suggested main modification: Policy H6 p.80, para. 6.63, 2 nd bullet more than 10% of the total dwelling stock is occupied as HMOs within approximately 100 metres of the site (including the proposal).

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

Representations received: 38 Object: 36 Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
<p>Student bed space limits:</p> <ul style="list-style-type: none"> • General objection to the limits was made by: <ul style="list-style-type: none"> • Bristol Animal Rescue Centre (252), Conygar Bristol Ltd (403), Elizabeth Blackwell Properties Ltd (189), University of the West of England (408), Fusion Group (396), Watkin Jones (437), Abrdn Plc (440), Bristol Alliance Limited Partnership (442), Christian Grant Properties Ltd (443), Smart Urban Living Bristol (one) Ltd (451), Cubex Land Limited (453), Unite Group Plc (457), Empiric Student Property (459), Schroders UK Real Estate Fund (460), University of Bristol (487), CKC Developments Ltd (397), Dominus Real Estate (289) and Argo Real Estate Management Ltd (491), with many requesting their removal. <ul style="list-style-type: none"> ▪ Most expressed concern that limits would not meet the need / make sufficient provision for student accommodation in the city including current undersupply/shortfall and future demand based on forecast growth including University of the 	<p>The council's understanding of student bed space need is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper.</p> <p>The policy provides for a level of bed space supply that will exceed the identified need.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
West of England (408) (UWE) expansion.		
<ul style="list-style-type: none"> ▪ Some respondents suggested alternative approaches including the figures being referred to as indicative/minimum requirements or increasing the bed space figures to reflect revised need calculations that take account of existing undersupply and UWE expansion plans. 	<p>The council's understanding of student bed space need is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper. The policy provides for a level of bed space supply that will exceed the identified need.</p>	No modifications suggested.
<ul style="list-style-type: none"> ▪ In contrast, Richmond Area Residents Association (370) and Action for Balanced Communities (204) considered the limits were set too high to be effective in preventing harm to communities. 	<p>The council's understanding of student bed space need is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper. The policy provides for a level of bed space supply that will exceed the identified need.</p>	No modifications suggested.
<ul style="list-style-type: none"> • Student bed space limit figures identified for particular sites / locations: <ul style="list-style-type: none"> • These were not supported by evidence according to the University of the West of England (408), ABRDN Plc (440), Christian Grant 	<p>The calculation of the bed space figures, identified in sections 2 and 3 of the policy, is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper.</p>	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Properties Ltd (443) and Unite Group Plc (457);		
<ul style="list-style-type: none"> The University of Bristol (487) were concerned that the figures for the Clifton and Stoke Bishop residential campuses had been underestimated; 	The calculation of the bed space figures, identified in section 2 of the policy, is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper .	No modifications suggested.
<ul style="list-style-type: none"> AEW UK Investment Management (458) objected to the student bed space limit for Bristol Shopping Quarter and considered it should be market-led and evidenced; 	The calculation of the bed space figures, identified in section 3 of the policy, is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper .	No modifications suggested.
<ul style="list-style-type: none"> Centrica Combined Investment Fund c/o LaSalle Investment Management (429) raised concern that the student bed space limit for Bristol Shopping Quarter was not evidenced; 	The calculation of the bed space figures, identified in section 3 of the policy, is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper .	No modifications suggested.
<ul style="list-style-type: none"> Bristol Animal Rescue Centre (252) considered that the student bed space limit for Bristol Temple Quarter and St. Philip's Marsh was inflexible and Conygar Bristol Ltd (403) considered it too low. 	The calculation of the bed space figures, identified in section 3 of the policy, is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper .	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Dandara Living Developments Ltd (430) objected to the student bed space limit for Frome Gateway and felt it should be increased. 	<p>The calculation of the bed space figures, identified in section 3 of the policy, is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Structadene (455) requested that further consideration be given to the bed space limits set out for areas of growth and regeneration with a view to increasing the limits if evidence provided by other respondents on student housing need was compelling. 	<p>The calculation of the bed space figures, identified in section 3 of the policy, is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Objection was raised by Richmond Area Residents Association (370), Action for Balanced Communities (204), Andrew Waller (267) and Oakfield Residents Association (275) to the 800 bed space limit for the University of Bristol Precinct. All respondents considered that this level of bed space provision would adversely affect the area. Action for Balanced Communities (204) and Oakfield Residents Association (275) requested a significant reduction in the number (to 100 bed spaces). 	<p>The calculation of the bed space figures, identified in section 3 of the policy, is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>The failure of the policy to make any bed space provision to support the potential expansion of its Bower Ashton Campus was of concern to the University of the West of England (408).</p>	<p>The council's understanding of student bed space need is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper. The policy provides for a level of bed space supply that will exceed the identified need.</p>	<p>No modifications suggested.</p>
<p>Calculation / evidence of student bed space need:</p> <ul style="list-style-type: none"> Concern that the Local Housing Needs Assessment had underestimated student growth was raised by the University of the West of England (408), Abrdn Plc (440) and the Bristol Alliance Limited Partnership (442). 	<p>The council's understanding of student bed space need is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper. The policy provides for a level of bed space supply that will exceed the identified need.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> The identified need for additional purpose-built student accommodation bed spaces up to 2040 (set out in para. 6.76) and / or the evidence supporting this figure did not take account of the current shortfall / undersupply of bed spaces and UWE expansion plans and would therefore not be sufficient to meet student accommodation needs according to Bristol Animal Rescue Centre (252), Conygar Bristol Ltd (403), Centrica Combined Investment Fund c/o LaSalle Investment Management (429), Elizabeth Blackwell Properties 	<p>The council's understanding of student bed space need is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper. The policy provides for a level of bed space supply that will exceed the identified need.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Ltd (189), Dandara Living Developments Ltd (430), Watkin Jones (437), Christian Grant Properties Ltd (443), Smart Urban Living Bristol (one) Ltd (451), Cubex Land Limited (453), Unite Group Plc (457), Empiric Student Property (459), Schrodgers UK Real Estate Fund (460), University of Bristol (487) and CKC Developments Ltd (397).</p>		
<ul style="list-style-type: none"> A perceived failure of the policy to meet objectively assessed need for student accommodation in the city was identified by Centrica Combined Investment Fund c/o LaSalle Investment Management (429) and Watkin Jones (437). 	<p>The council's understanding of student bed space need is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper. The policy provides for a level of bed space supply that will exceed the identified need.</p>	<p>No modifications suggested.</p>
<p>Guideline bed space thresholds (set out at para. 6.87):</p> <ul style="list-style-type: none"> Objection to the thresholds was made by Gloucestershire County Cricket Club (447), Fusion Group (396), Watkin Jones (437), Christian Grant Properties Ltd (443), Empiric Student Property (459), Schrodgers UK Real Estate Fund (460), the University of Bristol (487) and Argo Real Estate Management Ltd (491), with many requesting their removal. <ul style="list-style-type: none"> They considered the approach overly restrictive, would limit supply in locations 	<p>The guideline bed space thresholds are a mechanism to ensure a local imbalance of PBSA does not arise and that the delivery of PBSA is balanced with other development needs. The policy allows for the thresholds to be weighed against other factors. The calculation of the bed space thresholds is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>most appropriate for purpose-built student accommodation, would potentially exclude development on sustainably located sites and lacked justification/evidence. One respondent suggested that alternative parameters should be set.</p>		
<p>'Purpose-built student accommodation provision - other locations' section of the policy text and its requirement that such accommodation should form part of mixed use developments:</p> <ul style="list-style-type: none"> • Fusion Group (396) sought flexibility on this requirement; 	<p>This part of the policy is consistent with national and local policy objectives to deliver mixed use development. The expectation that mixed use is provided only where feasible and appropriate provides sufficient flexibility to developers.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • Dandara Living Developments Ltd (430) objected, stating that the local imbalance test would be sufficient to ensure mixed communities; 	<p>This part of the policy is consistent with national and local policy objectives to deliver mixed use development. Both elements of the policy are needed to ensure the provision of PBSA is balanced with other developments needs and supports the creation of mixed, balanced and inclusive communities.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • Christian Grant Properties Ltd (443), Empiric Student Property (459), Schroders UK Real Estate Fund (460) and the University of Bristol (487) considered the 	<p>This part of the policy is consistent with national and local policy objectives to deliver mixed use development. The expectation that mixed use is</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>requirement would be impractical or unviable in many cases and may restrict the supply of purpose-built student accommodation. They suggested the policy be re-worded to promote mixed use / compatible residential uses.</p>	<p>provided only where feasible and appropriate provides sufficient flexibility to developers. In practice, many PBSA developments either recently delivered or with planning permission provide for a mix of uses including residential.</p>	
<p>'Affordable student housing' section of policy text:</p> <ul style="list-style-type: none"> • The University of Bristol (487) raised objection, citing concerns around viability impacts and constraint of supply. They sought: <ul style="list-style-type: none"> • removal of the requirement; or • replacement with a commitment to work with higher education providers to establish a suitable mechanism to deliver affordable student housing through a supplementary planning document; or • if the requirement as set out in the policy was introduced, the approach should align with the 20% 'fast track' approach set out in the current Affordable Housing Practice Note. 	<p>The justification for the policy approach is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper. Viability issues are set out in the Bristol City Council: Local Plan Viability Assessment.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • Elizabeth Blackwell Properties Ltd (189), University of the West of England (408), Abrdn Plc (440), Bristol 	<p>The justification for the policy approach is set out in the Managing the Development of Purpose-Built</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Alliance Limited Partnership (442), Centrica Combined Investment Fund c/o LaSalle Investment Management (429), Dandara Living Developments Ltd (430), Watkin Jones (437), Smart Urban Living Bristol (one) Ltd (451), Unite Group Plc (457) and Dominus Real Estate (289) either objected to the requirement (some respondents also objected to the 35% sought) or expressed concerns:</p> <ul style="list-style-type: none"> • Most respondents considered that the approach was not supported by published evidence of need and/or would make development unviable; 	<p>Student Accommodation topic paper. Viability issues are set out in the Bristol City Council: Local Plan Viability Assessment.</p>	
<ul style="list-style-type: none"> • Others considered that the approach was not clearly articulated and/or further clarity needed on its implementation. 	<p>A main modification can be made to section 6 of the policy that acknowledges that higher education providers will not have control over all student accommodation developed and therefore will not always be able to allocate any affordable bed spaces provided.</p>	<p>Suggested main modification:</p> <p>Policy H7</p> <p>p.82, Policy text 6th section 2nd para.</p> <p>Bed spaces provided as affordable student housing should <u>where feasible</u> be allocated by the relevant higher</p>

Main issues raised	Council's comments	Suggested modifications / actions
		education provider to students it considers most in need of the accommodation.
<ul style="list-style-type: none"> Some respondents considered that the approach should be reviewed and/or if need could be demonstrated then the approach should be subject to viability testing. 	<p>The justification for the policy approach is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper. Viability issues are set out in the Bristol City Council: Local Plan Viability Assessment.</p>	No modifications suggested.
<ul style="list-style-type: none"> The requirement was contrary to national policy according to Fusion Group (396) and Argo Real Estate Management Ltd (491). 	National policy does not preclude any local requirement for affordable student housing.	No modifications suggested.
<ul style="list-style-type: none"> The operation of a rolling review of the affordable student housing percentage sought within the plan period was considered contrary to national policy by Dandara Living Developments Ltd (430). They thought this would instead require a strategic policy review and evidence base/viability testing. 	A flexible approach reflecting any change to market circumstances is considered appropriate.	No modifications suggested.
<ul style="list-style-type: none"> A review of the policy requirement to ensure a workable solution that would not impact viability and constrain supply was urged by Christian Grant 	<p>The justification for the policy approach is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper. Viability issues</p>	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<p>Properties Ltd (443), Empiric Student Property (459) and Schroders UK Real Estate Fund (460).</p>	<p>are set out in the Bristol City Council: Local Plan Viability Assessment.</p>	
<p>Regarding the first paragraph of the policy text and its first criterion relating to purpose-built student accommodation having 'no adverse effects on existing communities', objection was received from Watkin Jones (437), University of the West of England (408), Abrdn Plc (440) and Bristol Alliance Limited Partnership (442). They thought this incorrectly assumed that development might result in adverse effects thereby stigmatising students and student housing. Alternative wording was suggested.</p>	<p>This part of the policy is consistent with national and local policy objectives to ensure development supports strong, vibrant and healthy communities. The requirements that development is expected to meet to avoid adverse effects (as identified in para. 6.73 of the explanatory text) are related to the appropriate supply and distribution of PBSA development and do not suggest any inherent harmful effects.</p>	<p>No modifications suggested.</p>
<p>Objection to the second paragraph of the policy text requiring proposals to have support of the relevant higher education provider was made by Fusion Group (396), Dandara Living Developments Ltd (430), Watkin Jones (437), Smart Urban Living Bristol (one) Ltd (451), CKC Developments Ltd (397) and Argo Real Estate Management Ltd (491). Most respondents considered that further clarification/alternative wording could address this issue.</p>	<p>This part of the policy ensures that the needs of the city's higher education providers are being met, in terms of their expectations on the quantity, type and quality of accommodation for their students.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>'Purpose-built student accommodation provision at University of Bristol residential sites' section of the policy text:</p> <ul style="list-style-type: none"> the first criterion's requirement that development at University of Bristol residential sites be subject to a comprehensive masterplan should only apply to super-major purpose-built student accommodation development (100+ units) according to the University of Bristol (487). 	<p>The justification for this part of the policy is set out in para. 6.79 of the explanatory text and applies to any scale of development.</p>	<p>No modifications suggested.</p>
<p>Objections were raised by Fusion Group (396) and Argo Real Estate Management Ltd (491) over the identification of specific areas for student accommodation development.</p>	<p>The locations set out in sections 2 and 3 of the policy are considered appropriate. The wider policy makes provision for PBSA to come forward in any location in the city subject to relevant criteria.</p>	<p>No modifications suggested.</p>
<p>'Purpose-built student accommodation provision - other locations' section of policy text and its third bullet point regarding affordable housing contributions from self-contained student accommodation proposals</p> <ul style="list-style-type: none"> Objections or concerns were raised by Elizabeth Blackwell Properties Ltd (189), Dandara Living Developments Ltd (430), Christian Grant Properties Ltd (443), Empiric Student Property (459), Schrodgers 	<p>This part of part of policy seeks traditional affordable housing contributions from self-contained student units (non-cluster flats) where they form part or all of a development. Contributions are sought under policy AH1 which provides flexibility to the way that contributions are made if on-site provision is impractical.</p>	<p>No modifications suggested.</p>

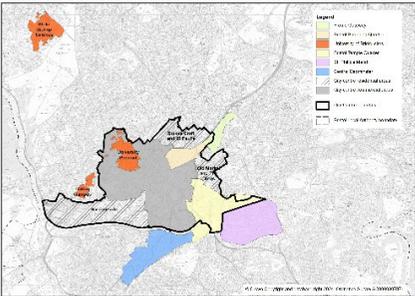
Main issues raised	Council's comments	Suggested modifications / actions
<p>UK Real Estate Fund (460) and the University of Bristol (487):</p> <ul style="list-style-type: none"> Some respondents considered that the form and occupation of student housing differed from that of traditional housing within the C3 Use Class, and/or that the requirement had not been viability tested. 		
<ul style="list-style-type: none"> Christian Grant Properties Ltd (443), Empiric Student Property (459), Schrodgers UK Real Estate Fund (460) and the University of Bristol (487) suggested that a contribution could be sought should bed spaces be converted to C3 use in the future. 	<p>Self-contained student units proposed as part of or the entirety of a development would be occupied in the same way as a dwellinghouse (C3) and should be subject to affordable housing contributions.</p>	<p>No modifications suggested.</p>
<p>The reference in para. 6.77 to aligning the start date for counting bed spaces to March 2019 should be amended to the start of the plan period according to Bristol Animal Rescue Centre (252), the University of the West of England (408), Abrdn Plc (440) and Bristol Alliance Limited Partnership (442). Conygar Bristol Ltd (403) and Unite Group Plc (457) raised concerns that the total level of bed space supply identified through the bed space</p>	<p>The policy seeks to accommodate the need for new student accommodation whilst ensuring mixed and balanced communities and that other development needs are met.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
limits would already have been granted planning permission if the March 2019 start date is retained.		
The reference in para. 6.86 to the potential detrimental effects of purpose-built student accommodation on residential amenity and/or the character of an area was objected to by Unite Group Plc (457) and Watkin Jones (437), citing a lack of evidence of such harm.	The issues set out in para. 6.86 reflect reasonable concerns identified by communities where concentrations of PBSA development have occurred.	No modifications suggested.
Concern was expressed by the Home Builders Federation (414) that the level of student bed space provision set out in the policy accounts for a sizeable proportion of the planned housing supply overall. They considered the plan needed to better reflect and acknowledge the interaction between student housing and other housing types.	The plan makes provision for the delivery of 1,925 homes annually including student accommodation.	No modifications suggested.
Bringing forward a supplementary planning document to support the policy approach was advocated by Richmond Area Residents Association (370), Action for Balanced Communities (204), Andrew Waller (267) and Oakfield Residents Association (275).	The policy does not identify the need for an SPD.	No modifications suggested.
The existing local plan approach (Policy DM2) was preferred by Fusion Group (396) and Argo Real Estate	The policy approach is required to manage issues relating to the development of PBSA.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Management Ltd (491) as it was considered to provide greater flexibility than proposed Policy H7.		
Reducing the provision of land for student housing for advocated by ElhPlan (404) and Chandos Neighbourhood Association (385), with the latter representor considering that this should be done in order to meet other development needs. Dominic Hogg (448) raised concern over the impact of future student growth on the city.	The council's understanding of student bed space need is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper .	No modifications suggested.
A more robust policy was needed to bring the levels of purpose-built student accommodation more into line with current student numbers according to Kevin Chidgey (345).	The council's understanding of student bed space need is set out in the Managing the Development of Purpose-Built Student Accommodation topic paper .	No modifications suggested.

Other suggested modifications (Policy H7)

Main issues raised	Council's comments	Suggested modifications/actions
<i>Issue identified by the council.</i>	Suggested main modification. Insert a missing word into section 5 of the policy to provide clarity.	Suggested main modification: Policy H7 p.81, Policy text 5 th section 1 st bullet

		Not result in a local imbalance of purpose-built student accommodation within any residential <u>area</u> , city centre commercial area or town centre;
Issue identified by the council.	Suggested main modification. Amend the policy diagram to show revised boundaries for University of Bristol Sites including Stoke Bishop Campus, University Precinct and Clifton Campus.	<p>Suggested main modification:</p> <p>Policy H7</p> <p>p.83, diagram 6.2</p> 

Policy H8: Older people's and other specialist needs housing

Representations received: 9

Object: 6

Support: 3

Main issues raised	Council's comments	Suggested modifications / actions
<p>The requirement for extra care housing or housing with care to provide 10% affordable housing was objected to by McCarthy Stone (300) and the Home Builders Federation (414). They considered that evidence in the Local Plan Viability Assessment had not been adequately taken into account.</p>	<p>Viability issues are set out in the Bristol City Council: Local Plan Viability Assessment. The policy allows for viability issues to be taken into account.</p>	<p>No modifications suggested.</p>
<p>The policy's provision seeking an affordable housing contribution for age-restricted general market housing, retirement living and sheltered housing proposals was objected to by McCarthy Stone (300) and the Home Builders Federation (414), citing concerns that it had not been viability tested.</p>	<p>Viability issues are set out in the Bristol City Council: Local Plan Viability Assessment. The policy allows for viability issues to be taken into account.</p>	<p>No modifications suggested.</p>
<p>Requiring at least 50% of extra care or housing with care dwellings to be designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users was objected to McCarthy Stone (300), citing a lack of supporting evidence.</p>	<p>Evidence relating to the need for wheelchair housing is set out in the City of Bristol Local Housing Needs Assessment.</p>	<p>No modifications suggested.</p>

Policy BTR1: Build to Rent housing

Representations received: 13

Object: 10

Support: 3

Main issues raised	Council's comments	Suggested modifications / actions
<p>The requirement in the policy text's second sentence for development to be 'in accordance with relevant development strategy policies' was objected to by Dandara Living Developments Ltd (430). They thought it was not generally consistent with the content of the Development Strategy policies (Policies DS1 to DS14) as only one of them (Policy DS3) made reference to build to rent development.</p>	<p>The expectations of the policy are clearly set out in the text.</p>	<p>No modifications suggested.</p>
<p>Reference in the policy text's third sentence to the mix of build to rent homes and other residential uses to be determined in accordance with any guidance set out in relevant future supplementary planning documents, masterplans or spatial frameworks was of concern to representors:</p> <ul style="list-style-type: none"> • Centrica Combined Investment Fund c/o LaSalle Investment Management (429), AEW Real Estate Investment Trust (435) and Watkin Jones (437) considered this would tie the provision of build to rent development to future guidance which 	<p>The potential preparation of an SPD, masterplan or spatial framework which may include further guidance on the implementation of this policy is considered appropriate.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>would not have development plan status and would not be subject to the same level of scrutiny as a local plan. Watkin Jones (437) considered that such guidance should be in the local plan.</p>		
<ul style="list-style-type: none"> Similarly, Dandara Living Developments Ltd (430) thought it was inappropriate to refer to the 'controls' offered by these non-statutory documents. They considered the issue of mix would be addressed by Policy H4 with any further guidance brought forward in a supporting role to the policy rather than as a means of control. 	<p>The potential preparation of an SPD, masterplan or spatial framework which may include further guidance on the implementation of this policy is considered appropriate.</p>	<p>No modifications suggested.</p>
<p>'Affordable housing provision' section of policy text:</p> <ul style="list-style-type: none"> The requirement for 75% social rent and 25% shared ownership where affordable housing is provided as a stand-alone block was objected to by Centrica Combined Investment Fund c/o LaSalle Investment Management (429), Dandara Living Developments Ltd (430), AEW Real Estate 	<p>The policy seeks a stand-alone block providing 75% social rent and 25% shared ownership only where feasible. Otherwise, the tenure is expected to be provided as affordable private rent. This flexible tenure arrangement is consistent with planning practice guidance which allows the affordable housing requirement to be met by other routes including other forms of affordable housing as defined in the NPPF.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Investment Trust (435) and Watkin Jones (437):</p> <ul style="list-style-type: none"> ▪ They considered this approach inconsistent with national policy which expects the normal form of affordable housing provision within build to rent development to be Affordable Private Rent. 		
<ul style="list-style-type: none"> • Reference in the policy text to further guidance being provided in the Affordable Housing Practice Note was of concern to the Home Builders Federation (414) and Watkin Jones (437). They considered the practice note's content should be properly included in the local plan and therefore subject to independent examination. The Home Builders Federation (414) considered that the document should only be referred to in the supporting text. 	<p>Reference to relevant existing guidance within the policy text is considered appropriate.</p>	<p>No modifications suggested.</p>
<p>'Build to rent - general provisions' section of policy text:</p>	<p>Relevant mechanisms are set out in planning practice guidance and the council's Affordable Housing Practice</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Regarding the second criterion and its reference to mechanisms to compensate for the sale or withdrawal of any build to rent home, Watkin Jones (437) thought these mechanisms should be set out in the local plan. 	Note: Delivery of Affordable Build to Rent Homes in Bristol.	
<ul style="list-style-type: none"> Regarding the sixth criterion, the on-site management requirement was objected to by Watkin Jones (437). They considered it was not a planning matter nor necessary to provide in all developments. 	The expectation is considered appropriate.	No modifications suggested.

Other suggested modifications (Policy BTR1)

Main issues raised	Council's comments	Suggested modifications/actions
<i>Issues identified by the council.</i>	A suggested main modification to criterion iii, section 2 is required to ensure consistency with para. 4, section 3. The additional wording proposed will take account of developments with a separate stand-alone affordable housing block owned and managed by a different	Suggested main modifications: Policy BTR1 p.91, Policy text 2nd section criterion iii

Main issues raised	Council's comments	Suggested modifications/actions
	landlord. A consequential modification is also required to the explanatory text.	<p>There is unified ownership and management of all residential units <u>or individual blocks</u> within the development;</p> <p>p.92, para. 6.115</p> <p>All homes <u>or individual blocks</u> are expected to be under unified ownership and management. This ensures the integrity of the development is maintained over time and simplifies contact between tenants and landlord.</p>
	A main modification is suggested to the explanatory text to provide flexibility for developers in how any uplift in affordable housing, identified through later stage viability testing, is delivered.	<p>Suggested main modification:</p> <p>Policy BTR1</p> <p>p.93, para. 6.121</p> <p>Where scheme viability prevents the delivery of the stated affordable housing</p>

Main issues raised	Council's comments	Suggested modifications/actions
		<p>percentage the developer will be expected to undertake viability testing at a later stage in the development process, prior to occupation of the units, to identify any potential for additional affordable housing where market conditions have improved. The number of affordable units initially identified alongside any additional units identified through <u>affordable housing uplift identified through</u> later stage viability testing <u>(delivered as units on site or through alternative mechanisms agreed with the council)</u> would be secured through a section 106 planning agreement.</p>

Policy H9: Accessible homes

Representations received: 8

Object: 7

Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
Paul Borthwick considered that the policy should make greater provision for wheelchair user dwellings that are accessible.	The council's understanding of the need for wheelchair housing is set out in the City of Bristol Local Housing Needs Assessment .	No modifications suggested.
The requirement for 10% of housing in proposals of 10 dwellings or more to be wheelchair accessible or easily adaptable was of concern to representors. Sovereign Network Group (461), AEW UK Real Estate Investment Trust and Taylor Wimpey (347) considered it was not supported by evidence in the Local Housing Needs Assessment.	The requirement has been informed by evidence set out in the City of Bristol Local Housing Needs Assessment .	No modifications suggested.
The requirement for all dwellings to be accessible and adaptable was objected to by Sovereign Network Group (461), AEW UK Real Estate Investment Trust and Taylor Wimpey (347), citing concerns about its evidenced justification.	The requirement has been informed by evidence set out in the City of Bristol Local Housing Needs Assessment .	No modifications suggested.

Policy H10: Planning for traveller sites

Representations received: 2

Object: 2

Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
John Knight (126) and the Westbury-on-Trym Society (229) considered that the policy should refer to the status of existing locations or identify sites to address issues relating to the permanent parking of caravans and other vehicles which have been adapted for residential use on public roads and land.	The policy sets out the approach to the location of proposals for residential sites for travellers and travelling showpeople as defined in Planning policy for traveller sites updated 19 December 2023.	No modifications suggested.

Other suggested modifications (Policy H10)

Main issues raised	Council's comments	Suggested modifications/actions
<i>Issue identified by the council.</i>	A main modification is suggested to the explanatory text to reflect the new definition of 'gypsies and travellers' set out in Planning policy for traveller sites updated 19 December 2023.	Suggested main modifications: Policy H10 p.96, para. 6.136, 1 st sentence As set out in national planning policy, travellers refers to people of nomadic habit of life whatever their race or origin, including people who on grounds only of their own or their family's or

		<p>dependants' educational or health needs or old age have ceased to travel temporarily <u>or permanently</u>, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.</p> <p>p.96, para. 6.137, 2nd sentence</p> <p>This includes people who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily <u>or permanently</u>, but excludes travellers as defined above.</p>
--	--	--

Economy

Policy E1: Inclusive economic development

Representations received: 7

Object: 5

Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
<p>Employment and Skills Plans requirement:</p> <ul style="list-style-type: none"> • Development size threshold: <ul style="list-style-type: none"> • A lack of justification and evidence was raised by Sovereign Network Group (461), Taylor Wimpey, AEW UK Real Estate Investment Trust and CBRE Investment Management (471) in their objection. 	<p>The requirement for ESP is included in the local list of planning application requirements and for consistency the requirement and threshold specified in the guidance note produced by the City Council on delivering ESP is incorporated in the policy.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • Considered overly onerous by Kevin Chidgey (345). 	<p>The policy reflects an existing and operational process. Further information is available on the Building Bristol website.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • When Plans would be required: <ul style="list-style-type: none"> • Policy text to clarify whether they would be required as part of a planning application or could be conditioned was sought by Royal London Asset Management (494), Sovereign Network Group (461), Taylor Wimpey, AEW UK Real 	<p>Bristol City Council now require all major planning applications to commit to the submission, and implementation of a local ESP for the construction phase of the development at validation stage. This requirement is included in the local list of planning application requirements and for consistency is reflected in the policy. The ESP will be secured through pre-commencement planning conditions and where appropriate, an End User ESP will also be required pre-occupation.</p>	<p>No modifications suggested – Note reference is included to the guidance within paragraph 7.5.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Estate Investment Trust and CBRE Investment Management (471).	The council approach is to use planning conditions to require the ESP to be produced and implemented at the appropriate stages of development. The process is set out in the guidance note.	
<ul style="list-style-type: none"> • Type of applications requiring Plans: <ul style="list-style-type: none"> • Clarification on whether Plans would be required for change of use applications was requested by Royal London Asset Management (494). 	<p>The requirement applies in respect of all major development proposals and is set out in the policy and further information is provided in the guidance.</p> <p>Note reference is included to the guidance within paragraph 7.5.</p>	No modifications suggested -
<ul style="list-style-type: none"> • Doubts regarding the implementation and effectiveness of the Plans were expressed by Kevin Chidgey (345), who favoured an alternative approach of seeking financial contributions from larger scale development to established skills training and work placement programmes. 	<p>The policy reflects an existing and operational process. Further information is available on the Building Bristol website.</p>	No modifications suggested.
Relocating existing employment jobs to accessible locations before they were lost was urged by ElhPlan (404).	The policy deals with addressing access to employment and securing employment and skills plans.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
To support the national objective of more sustainable transport, rail industry growth should be part of the local plan according to ElhPlan (404).	The local plan reflects proposals for improvements to rail infrastructure and rail sites with the potential for continued, intensified or future use are also safeguarded.	No modifications suggested.

Policy E2: Employment development land strategy

Representations received: 16 Object: 10 Support: 6

Main issues raised	Council's comments	Suggested modifications / actions
Business West and the Bristol Property Agents Association (477) questioned whether the economic needs of Bristol and the sub-region would be met, with concerns including:		
<ul style="list-style-type: none"> Insufficient policy protection for existing employment sites against higher land value uses; 	<p>Proposals for the redevelopment of sites most recently in employment use will be required to include provision of new workspace as part of mixed use developments.</p> <p>Identified areas are proposed to be reserved as industry and distribution and maritime industry areas and the continued use of land at Avonmouth industrial area and Bristol port for industrial, distribution, energy and port</p>	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
	related uses is supported through its own specific policy. 60 hectares of greenfield land adjacent to the industrial area are allocated for new industrial and distribution uses.	
<ul style="list-style-type: none"> • Inadequate provision of new office and industrial development land to meet demand identified in the evidence base documents; 	<p>The plan makes provision for the delivery of new workspace including: 164,000m² of net additional office floorspace; 164,000m² of net additional industry and distribution floorspace (with 61 hectares of new development allocations to accommodate part of this provision); and through intensification of development with proposals for all forms of workspace making effective and efficient use of land.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • Potential for: <ul style="list-style-type: none"> ○ A spatial imbalance in industrial land provision, with new allocations proposed for Avonmouth rather than other areas of the city; 	<p>In addition to the site allocations and 640 hectares of land reserved at Avonmouth, the development strategy proposes further industrial development through intensification on sites within the IDAs and through provision within some of the regeneration areas.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> ○ An under-provision of city centre office floor space leading to the loss of future occupiers to competitor cities. 	<p>The local plan makes appropriate provision for city centre office floorspace. The Employment Land Topic paper provides information on the approach set out in the policy.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> The delivery of industrial work space through the intensification of development not being viable in current market conditions. 	<p>The delivery of industrial workspace through intensification on existing sites in the city is well established and it is appropriate to make efficient use of urban land.</p>	<p>No modifications suggested.</p>
<p>Concerns were raised by Bristol Civic Society (285) about the loss of business sites and job opportunities to housing development, particularly in central and inner Bristol. They thought housing provision should be as part of balanced communities and not risk the loss of the type of jobs (e.g. in industrial and distribution businesses) which might suit the skills of local people.</p>	<p>The economy and development strategy policies make provision for the incorporation of work space into new development and as part of area regeneration.</p>	<p>No modifications suggested.</p>
<p>Concerns that the policy did not set out an accurate picture of the net amount of land proposed to be designated for industrial and warehousing uses was expressed by Kevin Chidgey (345). This was in connection with the potential significant loss of this type of land in the Development Strategy policy areas.</p>	<p>In addition to the site allocations and 640 hectares of land reserved at Avonmouth, the development strategy proposes further industrial development through intensification on sites within the IDAs and through provision within regeneration areas.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Providing more flexibility in the policy to allow alternative land uses on existing employment sites which were no longer viable or attractive to occupiers was advocated by CBRE Investment Management (471). Similarly, flexibility in the policy to allow alternative uses which support commercial activities was sought by Welding Industries Ltd (427).</p>	<p>The identification of land reserved for industrial, distribution and related uses within the local plan has been informed by economic and employment land studies and assessments. These areas represent Bristol's core provision of industrial and distribution land and accommodate a wide range of sectors. In order to support a diverse and inclusive economy these areas are reserved for industrial, distribution and related uses.</p>	<p>No modifications suggested.</p>
<p>The need for the transport evidence base to take into account the likely impact of any employment land proposals on the Strategic Road Network was advised by National Highways (473).</p>	<p>The development strategy locates new residential and other forms of development within the urban area and with a focus on regeneration areas in the core of the city. This is consistent with national planning policy. The transport chapter policies address transport impacts.</p>	<p>No modifications suggested.</p>
<p>The policy needed to be carefully balanced and informed by the market and viability issues according to AEW UK Investment Management (458).</p>	<p>The policy reflects the approach set out in the development strategy policies for specific areas (as well as policies contained within the economy and inclusive growth chapter of the local plan). These areas are subject to detailed regeneration work which will further shape development. The economic evidence base which informed policies in the local plan included market commentary and engagement.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Identifying nightlife venues and 24 hour economy uses as vital employment land uses was urged by NightWatch (368).	Policy SSE3 (Supporting Bristol's evening, night-time and culture economy) aims to support a thriving evening, hospitality and cultural economy, with a focus in Bristol's city centre and its town, district and local centres and parades.	No modifications suggested.
Allowing residential development on some land proposed for employment development to meet housing need and reduce in-commuting was advocated by David Gray (303).	The local plan makes provision for residential development and for the provision of workspace.	No modifications suggested.

Policy E3: Location of office development

Representations received: 8 Object: 5 Support: 3

Main issues raised	Council's comments	Suggested modifications / actions
Specific reference in the policy to supporting proposals for the renewal, intensification and extension of existing offices was sought by CBRE Investment Management and Centrica	This issue is addressed in Policy E2, which sets out the approach to the renewal and intensification for all forms of workspace by making effective and efficient use of land. The approach to office workspace is further supported by	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Combined Investment Fund c/o LaSalle Investment Management (474).	the Development Strategy policies DS1: Bristol City Centre; DS2: Bristol Temple Quarter; and DS3: St Philips Marsh.	
Clarity on the policy text's reference to 'smaller scale' office development was requested by Welding Industries Ltd (427).	It is considered the policy is clearly expressed and additional clarification is not required.	No modifications suggested.
Reducing the amount of land used for offices was recommended by ElhPlan (404).	The council considers the approach to office development is appropriate and consistent with other policy objectives.	No modifications suggested.
Requiring office developments to be designed and built with an alternative use in mind was advocated by ElhPlan (404).	Policy DMP1 sets out design principles for all new development in Bristol.	No modifications suggested.

Policy E4: Avonmouth Industrial Area and Bristol Port

Representations received: 8

Object: 7

Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
Natural England (489) raised a number of concerns:	Policy NZC5 (Renewable energy and energy efficiency) sets out considerations to be taken into account when deciding applications of proposals for the development of renewable energy generating sites.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Regarding the policy's in principle support for renewable energy generation, they considered that sufficient evidence had not been provided to demonstrate that large scale deployment of renewables would be deliverable without harm to the Severn Estuary Special Protection Area / Ramsar / Site of Special Scientific Interest designated wildlife sites. 		
<ul style="list-style-type: none"> They queried reference in the policy's 'Habitat mitigation - Hallen Marsh' section to development contributing towards habitat mitigation measures. They thought that the Hallen Marsh area was created to mitigate the loss of land resulting from developments allowed under the 1957 ICI planning permission. As new development would not be covered by this permission, any contribution would need to be over and above the mitigation provided for the 1957 permission's developments. They thought the policy should be amended to 	<p>The level of appropriate habitat mitigation will be considered as part of planning applications.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
define what was an appropriate contribution to habitat mitigation.		
<ul style="list-style-type: none"> Amendment to the Policies Map was sought to exclude a non-developed area of the Severn Estuary Site of Special Scientific Interest close to the oil basin which could support features associated with the site. 	The current Local Plan's Policies Map takes a similar approach. Policies applicable to SSSI will also apply to the area covered by Policy E4.	No modifications suggested.
Given the potential for development to have negative effects upon heritage assets in this location, as identified in the Sustainability Appraisal, Historic England (476) thought the policy could indicate how development should respond to likely heritage impacts.	Policy DMP1 (Delivering well-designed, inclusive places) and Appendix B (Design guidance) set out how development proposals will be expected to demonstrate how it will achieve good design, taking into account the ten characteristics of well-designed places, as set out in the National Design Guide.	No modifications suggested.
Additional text to include 'rail freight interchange' as one of the uses supported by the policy was requested by Network Rail (467). This was in connection with land shown on the Policies Map as 'ASA004', land east of Chittening Road.	Land safeguarded for transport infrastructure is covered by Policy T2A. Policy T2 sets out the support for the planned future transport infrastructure improvements.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<p>Strengthening the policy to require Bristol Port to maximise the use of existing previously developed land was sought by North Somerset Council (188).</p>	<p>Policy E4 is considered to set out an appropriate approach to development in the identified Avonmouth Industrial Area and Bristol Port.</p>	<p>No modifications suggested.</p>
<p>More flexibility on the uses supported by the policy was advocated by SevernNet (389), e.g., ancillary office uses and those uses which may be identified in promoting the area's decarbonisation through the Local Industrial Decarbonisation Plan.</p>	<p>The policy provides for a wide range of appropriate uses. Ancillary office uses may form part of industrial and distribution developments.</p>	<p>No modifications suggested.</p>
<p>Inadequate cross-boundary coordination regarding the Portbury, Avonmouth and Severnside areas was raised by SevernNet (389) in its objection. They felt that, by focussing on Avonmouth rather than also considering Portbury in North Somerset and Severnside in South Gloucestershire, opportunities had been missed to provide a more positive strategy for the area as a whole.</p>	<p>Two statements of common ground have been published alongside the local plan which set out the approach to cross boundary strategic matters. These discuss the approach to the Bristol Port and wider Avonmouth/Severnside area.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
The need for evidence to take into account the likely impact of the proposed employment land allocations on the Strategic Road Network was advised by National Highways (473). If mitigation was found to be needed, they considered policy text would be required to make reference to the delivery of necessary infrastructure.	The policy approach in the local plan enables appropriate mitigation for Bristol City Council and other highway authorities impacted. The transport model is currently subject to its run process. Transport chapter policies address matters of transport impact.	No modifications suggested.

Policy E5: Industry and Distribution Areas

Representations received: 16 Object: 15 Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
As part of their representation on the approach to employment land provision, Business West and the Bristol Property Agents Association (477) thought that a review was needed of those areas reserved in the existing local plan for industry and warehousing which	The local plan proposes industry and distribution areas which will be subject to Policy E5. These areas have been arrived at following the various stages of local plan consultation.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
were no longer proposed for safeguarding in the new local plan.		
More flexibility in the policy to allow the loss of land / floorspace in Industry and Distribution Areas was sought by representors in their objections:	Along with Avonmouth and Bristol Port, the Industry and Distribution Areas represent the core industrial land in the city. The retention of such land in those uses is appropriate having regard to the evidence.	No modifications suggested.
<ul style="list-style-type: none"> • Sovereign Network Group (461), CBRE Investment Management and Taylor Wimpey (480) thought criteria should be added to allow a loss where the proposal would contribute to meeting unmet development needs and where there was no longer demand for the existing use. 	Please see previous comment.	No modifications suggested.
<ul style="list-style-type: none"> • Watkin Jones (437) and Dominus Real Estate (289) sought an additional criterion to allow loss where it was supported by a neighbourhood development plan. 	Please see previous comment.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<p>Removal of Industrial and Distribution Area designation was sought for the following sites / areas:</p> <ul style="list-style-type: none"> • Bailey of Bristol's site at South Liberty Lane / Brook Gate, Ashton Vale. This representation was from Bailey of Bristol (129) who were seeking a mixed-use development allocation on the site. 	<p>Please see previous comment.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • City Business Park, Kingsland Trading Estate and Premier Business Park, Old Market / St Philip's. This representation was from Old Market Community Association (233) who felt that policy relating to these areas was covered by the Old Market Quarter Neighbourhood Development Plan Policy B5. 	<p>Please see previous comment.</p>	<p>No modifications suggested.</p>
<p>Industry and Distribution Area designation was sought by Mr N. Bracey (452) for land at Lamplighters Marsh, Shirehampton.</p>	<p>The site does not have existing industrial use. It meets the criteria for designation as Local Green Space.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Regarding the policy text's reference to Industry and Distribution Areas being reserved for sui generis uses of a similar nature to industry and distribution, clarification was sought by Sovereign Network Group (461), CBRE Investment Management and Taylor Wimpey (480) on the specific uses being referred to. Welding Industries Ltd (427) thought car / vehicle sales should be specified.</p>	<p>The council considers that the text in paragraphs 7.33 and 7.34 provides appropriate explanation regarding the other uses that the policy permits in the Industry and Distribution Areas.</p>	<p>No modifications suggested.</p>
<p>Regarding the list in the policy text of other uses likely to be acceptable on Industry and Distribution Areas, Welding Industries Ltd (427) sought additional references to gyms and other health uses as well as large-scale uses where other suitable sites / buildings were unavailable.</p>	<p>Please see previous comment.</p>	<p>No modifications suggested.</p>
<p>A policy commitment to a regular review of land designated as Industry and Distribution Area to assess the merits of continued designation was suggested by Sovereign</p>	<p>The local plan will be reviewed after 3 years.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Network Group (461), CBRE Investment Management and Taylor Wimpey (480).		
The Environment Agency (465) commented that all development should be set back 8 metres from the edge of main rivers, culverts or watercourses. They also stated that flood risk principles of the National Planning Policy Framework should be applied to all development planned in the flood zone.	Flood risk issues are addressed in other policies in the local plan.	No modifications suggested.

Policy E6A: New workspace within mixed use development

Representations received: 9 Object: 8 Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
Removal of the policy was sought by Sovereign Network Group (461) and CBRE Investment Management (471), citing lack of evidenced justification and viability impacts as concerns. They also questioned how sustainable it was to expect employment floorspace to be provided	Alongside the delivery of new homes, the local plan aims to ensure the diversity of use and opportunities for business and employment are maintained or enhanced. The need for workspace in Bristol is discussed in the Employment Land Topic Paper (November 2023) .	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
on sites whose unattractiveness to potential occupiers had already been demonstrated by its vacancy or underuse.		
Objection to this policy not being applicable to sites within Industry and Distribution Areas proposed for designation under Policy E5 was made by Old Market Community Association (233). They considered it was contrary to what they were seeking to achieve through the Old Market Quarter Neighbourhood Development Plan.	<p>The identification of land reserved for industrial, distribution and related uses within the local plan has been informed by evidence. These areas represent Bristol's core provision of industrial and distribution land and accommodate a wide range of sectors.</p> <p>The policies in the Old Market Neighbourhood Development Plan continue to be applicable.</p>	No modifications suggested.
Concern that the workspace uses promoted by this policy were too restrictive was raised by Old Market Community Association (233) who thought more flexible uses should be allowed to better achieve mixed-use development.	The policy approach is considered appropriate.	No modifications suggested.
Structadene (455) thought it may be desirable for the policy to state that redevelopment could include the introduction of mixed uses including residential or student	This policy is not related to the delivery of residential or student accommodation. Policy E6A does not apply to Development Strategy area policies as these contain specific provisions for development of workspace.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
accommodation, where appropriate. They also thought it might be useful for the policy to promote live-work units for certain redevelopment areas such as St Philip's Marsh.		
Specific reference in the policy text stating that the policy does not apply to Development Strategy policies DS1-DS4 was sought by Dandara Living Developments Ltd (430).	Paragraph 7.38 of Policy E6A (New workspace as part of mixed use development) clearly states that the policy does not apply to Development Strategy area policies as these contain specific provisions for development of workspace.	No modifications suggested.
Concerns about a lack of clarity were raised:		
<ul style="list-style-type: none"> Gloucestershire County Cricket Club (447) thought it should specify that the policy applies to development where business, industry or distribution is the primary use, thereby excluding those sites where it is ancillary to another use. 	The policy wording is considered to be clear.	No modifications suggested.
<ul style="list-style-type: none"> Sovereign Network Group (461) and CBRE Investment Management (471) sought a definition of 'recently' 	It is considered the policy is clearly expressed and additional clarification is not required.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
regarding its use in the first sentence of the policy text which refers to '...sites and premises currently or recently used...'		

Policy E6: Affordable workspace

Representations received: 17 Object: 16 Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
<p>A number of issues were raised in objections made by representors from the development industry / landowners:</p> <ul style="list-style-type: none"> • lack of clarity on implementation / operation, including uncertainty on: 		
<ul style="list-style-type: none"> • development size threshold and location to which policy will apply; 	The policy refers to an SPD which will provide further guidance on the delivery and management of affordable workspace in Bristol.	No modifications suggested.
<ul style="list-style-type: none"> • market rent discount proposed; 	See above	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> definition of affordable workspace; 	A definition is provided in paragraph 7.46 of the local plan.	No modifications suggested.
<ul style="list-style-type: none"> practical issues, e.g. the management of a building which contains affordable workspace; 	The policy refers to an SPD which will provide further guidance on the delivery and management of affordable workspace in Bristol.	No modifications suggested.
<ul style="list-style-type: none"> deferring of key details to the unpublished Affordable Workspace Supplementary Planning Document; 	It is appropriate for the policy to be supported by supplementary planning guidance.	No modifications suggested.
<ul style="list-style-type: none"> impacts on scheme deliverability due to absence of viability testing; 	Provision of affordable workspace can be secured as part of viable developments.	No modifications suggested.
<ul style="list-style-type: none"> lack of evidenced justification. 	Paragraph 7.44 refers to the particularly high cost of workspace in Bristol and that provision of affordable workspace is important to ensure that individuals, organisations and businesses can access a range of employment spaces at affordable rates and on flexible terms for economic, social and cultural purposes.	No modifications suggested.
Support was received from Bristol Business Improvement Districts (423) and Science	The council notes the support for the policy.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Creates (445), although the latter sought clarity on where and how the policy will be applied. Similarly, while welcoming the policy, Business West and the Bristol Property Agents Association (477) noted that details were not yet provided.	The policy refers to an SPD which will provide further guidance on the delivery and management of affordable workspace in Bristol.	

Policy E8: Digital connectivity and inclusion

Representations received: 1 Object: 1 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
John Knight (126) thought that the Local Plan should state that all new residential development and new broadband infrastructure to existing residences should be 1 gigabits per second symmetrical and all new and existing businesses should be a minimum of 1 gigabits per second and preferably 10 gigabits per second symmetrical. A glossary of broadband definitions was also advocated.	Policy E8 will ensure the present industry standard of digital connectivity will be provided through maintaining up-to-date technical guidance.	No modifications suggested.

Centres, Shopping and the Evening Economy

Policy SSE1: Supporting Bristol's Centres – network and hierarchy

Representations received: 16

Object: 13

Support: 3

Main issues raised	Council's comments	Suggested modifications / actions
<p>Representations seeking the designation of new centres were made:</p> <ul style="list-style-type: none"> A centre designation covering the extent of the current local plan's 'Aerospace industries, south of Filton Airfield' Principal Industrial and Warehousing Area designation was sought by YTL Developments (UK) Ltd (407). They felt this would be consistent with the proposal in the draft South Gloucestershire Local Plan for a new 'local centre' at Brabazon (former Filton Airfield) and would reflect the development associated with the new Arena and related uses currently under construction. 	<p>The council considers that the uses proposed for this does not meet criteria for a designation as a centre.</p>	<p>No modifications suggested</p>
<ul style="list-style-type: none"> A town or district centre designation covering Eastgate Retail Park was 	<p>The retail park is not considered to be a centre.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
requested by CPG Bristol Limited (286), with an alternative designation being an extension to Stapleton Road District Centre.		
<ul style="list-style-type: none"> Designating as a local centre the shops on Lanaway Road, near Oldbury Court was advocated by Fishponds Community Planning Group (190), Friends of the Park (Oldbury Court Estate) (295) and Fiona Gleed (287), with the latter representor also advocating the inclusion of the pub on nearby Gill Avenue as part of the designation. 	Lanaway Road does not have a sufficient concentration of main town centre uses to be identified as a centre.	No modifications suggested
Regarding the 'distinctive parts of the city centre' identified in the policy text's 'Centre Network and Hierarchy', Bristol Business Improvement Districts (423) suggested consideration be given to including reference to an additional location at Broad Plain/Temple Quay. They felt this would reflect recent retail and leisure uses on Avon	Retail and related uses occur throughout the city centre, this location does not have sufficient concentration of uses to merit a specific mention. But complementary retail and leisure uses are among the potential uses identified for Bristol Temple Quarter by DS2.	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
and Oxford Streets, supporting new residential development in this location.		
More flexibility in the policy text on the uses allowed in centres was urged by Sovereign Network Group (461), AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (482).	The policy offers enough flexibility for main town centre uses in centres and is consistent with national planning policy.	No modifications suggested
Regarding the 'Active Uses' section of the policy text, amendments were sought by Legal and General (409). They thought the policy needed to balance encouraging the provision of active ground floor uses with the requirement for other building needs such as plant and storage.	The policy offers sufficient flexibility for all building's needs.	No modifications suggested
<p>Regarding the 'Residential Uses' section of the policy text:</p> <ul style="list-style-type: none"> • wording which provided more support for residential development in centres and commercial spaces / frontages was sought by Sovereign Network Group (461), AEW UK Real Estate Investment Trust, Centrica 	<ul style="list-style-type: none"> • The NPPF states that primary shopping areas are a defined area where retail development is concentrated. The approach is in line with national policy. • The wording is considered appropriate. 	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
<p>Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (482);</p> <ul style="list-style-type: none"> a lack of clarity regarding reference to 'underused and vacant space away from commercial frontages' was of concern to Anchor (346) in its objection. 		
<p>Regarding the 'Creation of New Centres' section of the policy text:</p> <ul style="list-style-type: none"> concern was expressed that this process should be considered in consultation with communities. In order to avoid unreasonable burdens on the delivery of new centres, Sovereign Network Group (461), AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (482) thought the policy should make clear that applicants and developers could lead this process. 	<p>The policy wording states that the creation of new centres should be considered in consultation with communities through the preparation of masterplans and frameworks.</p>	<p>No modifications suggested</p>
<ul style="list-style-type: none"> specific reference to Temple Quarter and Temple Island was sought by Legal and 	<p>The local plan makes appropriate references to these areas. Complementary retail and leisure uses are among</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
General (409). They felt this would reflect the location's accessible and sustainable location for growth.	the potential uses identified for Bristol Temple Quarter by DS2.	
<p>Objection to the policy was received from Hotwells and Cliftonwood Community Association (261):</p> <ul style="list-style-type: none"> the inclusion of Hotwell Road as part of the city centre was contested; a failure to plan for expected new growth associated with the Western Harbour development was identified, including consideration of a new local centre and its appropriate location to serve existing and new communities. 	The city centre boundary is defined by Policy DS1 and represents an appropriate continuation of existing local plan approach. Development requirements for Western Harbour are set out in DS4.	No modifications suggested
As he felt it was no longer supported by the Government, John Knight (126) thought deleting reference to the '15-minute city' in the introductory text should be considered.	Policies in Centres, shopping and the evening economy support the broad aim of a 15-minute city where facilities and services are close to people's homes.	No modifications suggested

Policy SSE2: Development in Bristol's centres

Representations received: 8

Object: 8

Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
<p>Regarding the 'City Centre' section of the policy text, amending the policy text of its second paragraph to cross-refer to Policy DSA1 'Bristol City Centre - Broadmead, Castle Park and the Old City' and the Broadmead growth and regeneration area was sought by Bristol Alliance Limited Partnership (442).</p>	<p>This reference is not considered necessary.</p>	<p>No modifications suggested</p>
<p>The 'Residential Development' section of the policy text was considered too restrictive in its approach to allowing residential uses:</p> <ul style="list-style-type: none"> • AEW UK Investment Management (458) felt the policy should contain sufficient flexibility to respond to market conditions and any long-term vacancy of units due to lack of commercial interest. • According to Sovereign Network Group (461), AEW UK Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management (472), the criteria which, if met, would allow residential development in 'wider centre boundaries' should also apply to all centre 	<p>The NPPF states that primary shopping areas are a defined area where retail development is concentrated. The local plan provides appropriately for residential development in centres.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
boundaries and not exclude primary shopping areas.		
NightWatch (368) commented that the policy text does not highlight the West End Gay Village area of Frogmore Street.	SSE3 supports the diverse evening, nighttime and culture economy, which includes the uses in the West End gay village area.	No modifications suggested

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

Representations received: 9

Object: 9

Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
The policy could lead to the sterilisation of land identified for regeneration, according to Marble Mosaic Co. Ltd (371), who requested text to specify that it would not apply to the area identified under Policy DS2 'Bristol Temple Quarter'.	Policy DS2 sets out the approach to development in Bristol Temple Quarter.	No modifications suggested
Regarding the first sentence of the policy text, specific reference to supporting hotel and other visitor accommodation development was sought by Dominus Real Estate (289).	The policy text refers to hospitality which would include hotels.	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
<p>While supportive of the centres focus, Dominus Real Estate (289) thought amendments were needed to offer support for hospitality uses in other locations, e.g. where identified by a neighbourhood development plan or where the existing use is longer needed.</p>	<p>The policy approach is consistent with national planning policy including the sequential approach.</p>	<p>No modifications suggested</p>
<p>Regarding the third paragraph of the policy text and its reference to new evening and night-time economy uses being neighbourly, Hampton Park and Cotham Hill Community Group (344) thought that, as well as having regard to the character of the centre, respecting the amenity of local residents should be referenced.</p>	<p>Policy HW1A deals with the impact of noise pollution.</p>	<p>No modifications suggested</p>
<p>Regarding the reference in the policy text to the loss of cultural venues and night time economy uses:</p> <ul style="list-style-type: none"> • a lack of clarity was of concern to Marble Mosaic Co. Ltd (371) in their objection, who sought: 	<p>The intentions of this policy are considered clear.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • a definition of 'cultural venues' and 'night time economy uses'; • detail on what information would be required to demonstrate that a use is no longer viable and that the premises could not accommodate another similar use. • The Theatres Trust (45) thought that reference to 'no longer viable' should be replaced with 'no longer required by the community'. They felt the term 'viability' could be manipulated through the intentional neglect and vacancy of a facility. 		
<p>Regarding the 'Outside space for hospitality businesses' section, Bristol Business Improvement Districts (423) felt the policy text could be clearer that it is referring to the highway and parking spaces, rather than just the pavement.</p>	<p>The policy addresses spaces which require planning permission and which would comply with other relevant regulations.</p>	<p>No modifications suggested</p>
<p>Objection to the 'Agent of change' section in the policy text was made by Marble Mosaic</p>	<p>The agent of change principle is relevant to the evening and night-time economy therefore it is appropriate to</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
Co. Ltd (371) citing concerns that it duplicated national planning policy.	place it in this policy. The NPPF says planning policies should ensure that new development can be integrated effectively with existing businesses and community facilities.	
NightWatch (368) thought that there should be policy text ensuring the 'Provision and retention of cultural and 24 Hour economy uses'.	The policy text confirms that the local plan seeks to retain cultural and 24 hour economy uses.	No modifications suggested
Concerns about noise impacts arising from the construction and operation of new development were raised by Dominic Hogg (448).	Policy HW1A deals with the impact of noise pollution.	No modifications suggested

Policy SSE4: Town centre first approach to development

Representations received: 3 Object: 2 Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
Regarding the third paragraph of the policy text relating to planning applications for 'main town centre uses', a potential conflict between the policy and Policy E6A 'New	The third paragraph references main town centre uses in relation to the sequential test as set out in national policy, this policy is therefore in conformity with national policy.	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
workspace within mixed use development' was identified by AEW UK Real Estate Investment Trust, CBRE Investment Management and Centrica Combined Investment Fund c/o LaSalle Investment Management (472). They sought detailed amendments to address this.		
The policy's explanatory text unnecessarily limits the flexibility of Class E uses according to AEW UK Real Estate Investment Trust, CBRE Investment Management and Centrica Combined Investment Fund c/o LaSalle Investment Management (472).	The policy seeks to maintain the most appropriate mix of uses within centre consistent with national planning policy.	No modifications suggested

Policy SSE5: Temporary uses in centres

Representations received: 5

Object: 1

Support: 4

Main issues raised	Council's comments	Suggested modifications / actions
The policy's statement that the temporary use of vacant sites for car parking will not be acceptable was objected to by the Westbury-on-Trym Society (229). They felt it lacked	Parking spaces as temporary use of vacant sites are not considered appropriate as it may discourage and delay the future permanent redevelopment of vacant sites.	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
justification and considered there could be circumstances where car parking could support the viability of centres.		

Policy SSE6: Retaining and enhancing markets

Representations received: 2 Object: 1 Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
Bristol Business Improvement Districts (423) thought that city centre markets should complement rather than detract from the offerings of city centre businesses and specifically should consider the food and beverage offer of businesses nearby.	The policy is in line with national planning policy and is supportive of the creation of appropriate new markets in the correct locations.	No modifications suggested

Policy SSE7: Provision of public toilets

Representations received: 22 Object: 5 Support: 17

Main issues raised	Council's comments	Suggested modifications / actions
Policy wording requiring toilets to remain open to the public for the duration of the public use of the building was advocated by Windmill Hill and Malago Planning Group (174), who also sought reference to toilets being designed to be safe, secure and able to be supervised.	The policy expects the secure the future management of public toilets and changing places.	No modifications suggested
Reference to 'free' toilets was questioned by Bristol Business Improvement Districts (423), who suggested 'low cost' as an alternative wording to ensure their appropriate management.	Major developments that are open to the public should provide free and publicly accessible toilets and changing places.	No modifications suggested
The policy was considered unrealistic and expecting too much of developers by the Westbury-on-Trym Society (229).	Major developments that are open to the public should provide free and publicly accessible toilets and changing places.	No modifications suggested
Concerns were raised that the policy lacked clarity on how it would be implemented by AEW UK Investment Management (458), Sovereign Network Group (461), AEW UK Real Estate Investment Trust and Centrica Combined Investment Fund c/o LaSalle Investment Management (475). Clarity was	The intentions of the policy are considered clear.	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
sought on who would have access to the public toilets (e.g. customers only?) and which type of developments the policy related to (e.g. leisure schemes or mixed-use housing-led developments with a retail unit?).		
Objection to the requirement that 'Changing Places' toilets should be open 24 hours a day when accessed from areas of public realm was made by Sovereign Network Group (461), AEW UK Real Estate Investment Trust and Centrica Combined Investment Fund c/o LaSalle Investment Management (475). This was on the grounds of raising safety, security and maintenance issues.	Other planning considerations will be dealt with as part of the planning application process.	No modifications suggested
Support was received from Friends of Novers Hill and Crox Bottom (Western Slopes) (155), Fishponds Community Planning Group (190) and fourteen members of the public.	Support noted.	No modifications suggested

Policy SSE8: Public houses

Representations received: 8

Object: 2

Support: 6

Main issues raised	Council's comments	Suggested modifications / actions
Extending the policy's provisions to cover venues which meet the Music Venue Trust and CAMRA definitions, nightclubs and all other 24 Hour economy mixed venue types was advocated by NightWatch (368).	Policy SSE3: Supporting Bristol's evening, night-time and culture economy sets out the policy protections for these uses.	No modifications suggested
Support was received from Bristol Business Improvement Districts (423), Dr Lesly Huxley (151), Leslie Cooper (215), Conor O'Neill (239) and Tony Lloyd (380).	Support noted	No modifications suggested

Biodiversity and Green Infrastructure

Chapter-wide issues

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> In the absence of a green and blue infrastructure strategy, Natural England (489) considered the chapter's approach lacked detail on strategic green infrastructure aims and how development proposals could be designed to contribute 	<p>The policies make several references to other existing or emerging and future strategies which, together, provide a strategic context for the local plan which will continue to be developed and enhanced:</p> <ul style="list-style-type: none"> As set out at paragraph 9.1.12, a Bristol green infrastructure strategy will be developed in due 	Additional modifications are suggested to paragraph 9.1.11 that will clarify the definition of ecological networks for the purposes of planning now that the Local Nature Recovery

Main issues raised	Council's comments	Suggested modifications / actions
<p>to those aims. They feared this could lead to green infrastructure improvements failing to form part of a coherent network to target key issues such as urban heat islands and flood risk. It could also mean inequalities in people's access to greenspace may not be understood and therefore not appropriately addressed.</p> <ul style="list-style-type: none"> • A Green Infrastructure Strategy for Bristol was also sought by Urban Greening Bristol (374) and Bristol Business Improvement Districts (423). 	<p>course, which will supplement the West of England Joint Green Infrastructure Strategy referenced by the policies.</p> <ul style="list-style-type: none"> • The policies make several links to the 'Nature Recovery Network and wider ecological networks'. Ecological networks are defined to a certain extent by the West of England Local Nature Recovery Strategy (LNRS) but, following a public consultation on the LNRS which ended in May 2024, the council has identified a need for further local ecological network mapping, until which time 'wildlife corridors' referenced by the existing local plan will continue to have a role to play. 	<p>Strategy has been further developed.</p>

Policy BG1: Green infrastructure and biodiversity in new development

Representations received: 30 Object: 26 Support: 4

Main issues raised	Council's comments	Suggested modifications / actions
<p>Whilst welcoming elements of the policy, Natural England (489) sought the following amendments to strengthen or clarify it:</p>	<p>Policies BG1 and BG2 require development in Bristol to take all available opportunities to connect to or enhance the integrity of the Nature Recovery Network and wider ecological networks.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Specific reference should be made to the design of development being informed by ecological networks. 		
<ul style="list-style-type: none"> The policy should go beyond retaining and enhancing existing green infrastructure features on site. They thought that, by auditing on- and off-site features through Green Infrastructure Statements, development proposals could show enhanced connections to off-site assets. 	<p>The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure. The policy makes specific references to connecting to ecological networks, enhancing access to nature and extending access to active travel links.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Minimum numbers per new dwelling of features such as bird boxes and bee bricks should be set. 	<p>The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure. The policy makes specific reference to incorporating habitat assistance features, but in a more flexible way that enables the most appropriate solution to be found in each case.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Explanation should be provided on what is meant in the policy's sixth bullet point by providing appropriately for recreational access. 	<p>The most appropriate extent and type of recreational access can be determined with reference to other policies, including those related to nature conservation and the provision of open space for recreation.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • Green Infrastructure Statements should identify where financial contributions are required to deal with the management pressures of new development. • Detail should be set out on the information that Green Infrastructure Statements should provide regarding the long-term management and maintenance of green infrastructure. 	<p>Where green infrastructure is provided, the policy requires that provision will be made for its long-term management and maintenance. Green Infrastructure Statements will be expected to set this out in a sufficient level of detail to allow a clear determination.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • Further guidance is needed on how developers will demonstrate meeting Natural England's Green Infrastructure Standards, e.g. some standards require the council to set targets which developments have to be designed to meet. 	<p>The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure. Specific standards are set against the Urban Greening Factor. The other Natural England Green Infrastructure Standards, while not prescribed in specific detail by the policy, may prove helpful to applicants in formulating their Green Infrastructure Statements.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • The higher target score of 0.5 for residential greenfield sites in relation to the Urban Greening Factor should be used. 	<p>The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure. The majority of residential development in Bristol takes place on brownfield land.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> In relation to the green infrastructure provision matters set out in the policy's seven bullet points, the wording should ensure these matters 'must' be complied with rather than 'should' be. 	<p>The expectations of the policy are clearly set out in the text. In national planning policy language, 'must' is reserved for matters of specific legal compliance.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Reference could be made to Natural England's 'Green Infrastructure Planning and Design Guide'. 	<p>The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure. However, the additional guidance may prove useful to applicants.</p>	<p>An additional modification is suggested to paragraph 9.1.16 to add a reference to the guidance for further information.</p>
<ul style="list-style-type: none"> Reference to the West of England's Joint Green Infrastructure Strategy in para. 9.1.12 could also specify its strategic projects such as the String of Pearls and Waterspace and include a map so that new development can integrate into them. 	<p>External strategies are liable to change and such a reference could become out of date. As noted in the paragraph, a further Bristol green infrastructure strategy will be developed in due course.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Text within the blue shaded box entitled 'Pollinating insects' should be included within the policy to increase its effectiveness and clarity. 	<p>The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure. The reference to pollinating insects is a helpful additional flag.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Objection to the policy was made by Anchor (346) who considered it overly onerous, lacking flexibility and insufficiently justified.	The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure.	No modifications suggested.
A perception that new development will be required to provide green roofs and living walls was considered inappropriate by Sovereign Network Group (461) on the grounds that it would require a burdensome management cost and, in the case of green roofs, would not be suitable for tall buildings.	The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure. Green roofs are one of various options that the policy offers, with sufficient flexibility to allow the most appropriate solution to be found for any given site.	No modifications suggested.
Concerns about the requirement to meet Urban Greening Factor targets were raised by Abrdn Plc (440), Sovereign Network Group (461), Dandara Living Developments Ltd (430), Bristol Alliance Limited Partnership (442), Gloucestershire County Cricket Club (447), AEW Real Estate Investment Trust and CBRE Investment Management (470). These included a lack of flexibility (e.g. not allowing off-site provision), being unnecessary given other policy requirements such as biodiversity net gain, and a lack of evidence to demonstrate no adverse effects on scheme	The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure. Urban Greening Factor is a nationally described standard. It serves as a complimentary requirement to Biodiversity Net Gain (BNG) particularly on sites where the existing biodiversity value is low to nil. Conversely, on sites where a high level of BNG is required and met on site, the provision of green infrastructure to satisfy BNG requirements will also contribute to the site's Urban Greening Factor score.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
viability. The Home Builders Federation (414) also thought there was a lack of clarity between these targets and meeting biodiversity net gain requirements.		
The failure of the policy to support the concept of mitigation where loss of biodiversity features was unavoidable was objected to by Sovereign Network Group (461), AEW Real Estate Investment Trust and CBRE Investment Management (470).	The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure. It prioritises the retention of important existing features. Mitigation under specific circumstances is addressed by subsequent policies including those related to nature conservation (BG2), biodiversity net gain (BG3) and trees (BG4).	No modifications suggested.
<p>A lack of clarity was of concern to several representors:</p> <ul style="list-style-type: none"> • definitions of 'wider network' in the policy's first sentence and 'important' in its third bullet point were sought by Sovereign Network Group (461), AEW Real Estate Investment Trust and CBRE Investment Management (470). 	See 'chapter-wide issues' above.	See 'chapter-wide issues' above.
<ul style="list-style-type: none"> • Bristol Parks Forum (495) sought a definition of 'biodiversity'. 	The term is widely defined. The policies in this chapter set out what is expected of development in relation to biodiversity and nature recovery.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Windmill Hill and Malago Planning Group (174) felt the term 'green infrastructure' was imprecise. They also considered the implementation of multifunctional benefits referred to in the policy's fourth bullet point lacked clarity on which benefits would be most appropriate. 	<p>The use of the term 'green infrastructure' is consistent with national planning policy, which defines it. Green infrastructure is expected to offer multifunctional benefits.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Sovereign Network Group (461) felt the reference to artificial grass should specify that it could be acceptable for all-weather playing spaces which utilise synthetic grass. 	<p>The approach to artificial grass is not applicable to playing pitches.</p>	<p>No modifications suggested.</p>
<p>More stringent policy wording was sought by Bristol Parks Forum (495), Chandos Neighbourhood Association (385), Dominic Hogg (448) and Manor Woods Valley Group (63), e.g. use 'required' rather than 'expected' or 'should'. Similarly, the Environment Agency (465) advocated removing 'Take all available opportunities' from the fourth and fifth bullet points.</p>	<p>The expectations of the policy are clearly set out in the text.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Including reference to how green infrastructure can improve water quality through reduced storm overflows was suggested by the Environment Agency (465).	Flood protection and water quality are among the potential benefits identified by policies BG1 and BG5.	No modifications suggested.
Including a map or diagram within the policy which showed the city's green infrastructure network was advocated by Urban Greening Bristol (374). Similarly, Bristol Parks Forum (495) thought that ecological networks and wildlife corridors should be shown or their locations described. Likewise, John Knight (126) thought the Nature Recovery Network should be shown on the Policies Map.	The policy makes reference to external strategies and sources for this information. These are liable to change over time and an embedded map could become out of date. Specific nature conservation sites are designated at policy BG2.	No modifications suggested.
Specific reference to Natural England's green infrastructure standards for Urban Nature Recovery, Accessible Greenspace Standards and Urban Tree Canopy Cover was advised by Bristol Business Improvement Districts (423).	The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure. Specific standards are set against the Urban Greening Factor. The other Natural England Green Infrastructure Standards, while not prescribed in specific detail by the policy, may prove helpful to applicants in formulating their Green Infrastructure Statements.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
A greater emphasis on nature-based solutions for sustainable urban drainage, the importance of nature and public health, and linking the Urban Heat Island effect with the Keep Bristol Cool strategy was requested by Bristol Business Improvement Districts (423).	The policy notes the health and wellbeing benefits of green infrastructure. Flood protection and reduced urban heating are also among specific benefits identified.	No modifications suggested.
Including additional information on the installation of nest boxes for birds was advocated by Bristol Swifts (100), Michael Priaulx (227) and Camilla Barlow (17).	The policy makes reference to incorporating habitat assistance features in a flexible way that enables the most appropriate solution to be found in each case.	No modifications suggested.
A perceived failure of the policy to address how the installation and maintenance of green infrastructure improvements would be monitored was of concern to CPRE Avon and Bristol (492), Windmill Hill and Malago Planning Group (174) and Manor Woods Valley Group (63).	Where green infrastructure is provided, the policy requires that provision will be made for its long-term management and maintenance. Green Infrastructure Statements will be expected to set this out in a sufficient level of detail to allow a clear determination.	No modifications suggested.
The absence of a Nature Recovery Strategy for Bristol was of concern to Bristol Tree Forum (148) and Urban Greening Bristol (374), who thought it could hinder opportunities for delivering green infrastructure improvements.	See 'chapter-wide issues' above.	See 'chapter-wide issues' above.

Main issues raised	Council's comments	Suggested modifications / actions
The production of guidance for developers in preparing Green Infrastructure Statements was recommended by Bristol Urban Greening (374).	The need for further guidance will be reviewed over time.	No modifications suggested.

Policy BG2: Nature conservation and recovery

Representations received: 40

Object: 38

Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
<p>Whilst welcoming elements of the policy, Natural England (489) sought the following amendments to strengthen or clarify it:</p> <ul style="list-style-type: none"> • Rather than 'connect to or enhance', the policy's first sentence should be amended to 'restore, connect to and enhance the integrity of the Nature Recovery Network...' 	Adding an additional reference to restoration would be consistent with national planning policy.	<p>Suggested additional modification:</p> <p>Policy BG2, 1st sentence of policy text</p> <p>Development in Bristol will be expected to take all available opportunities to <u>restore</u>, connect to or <u>and</u> enhance...</p>
<ul style="list-style-type: none"> • The policy must require development to follow the mitigation hierarchy referred to in national planning policy as this requirement does not relate only to the 	The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure. The mitigation hierarchy	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<p>Biodiversity Net Gain process. Where offsite compensation is required, this should contribute to and enhance ecological networks.</p>	<p>is reflected in the policy, which seeks to avoid impacts before mitigating them.</p>	
<ul style="list-style-type: none"> Regarding the 'International' part of the policy's 'Designated sites - hierarchy' section, additional wording was advised to make clear that potential Special Protection Areas and possible Special Areas of Conservation enjoy the same protection as 'habitats sites' defined in national planning policy. 	<p>The NPPF advises on the protection to be given to potential SPAs, possible SACs and proposed Ramsar sites.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> In the 'Local' part of the 'Designated sites - hierarchy' section, wording should be added to ensure development which could harm Sites of Nature Conservation Interest makes a contribution to the continued favourable management of the site. 	<p>The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure. The policy references avoiding and mitigating harm.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> The reference in the third paragraph of the policy to 'development which is in accordance with the local plan' should be 	<p>The suggested wording is not considered necessary and would incorrectly specify the role of an individual officer.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
followed by 'and has been agreed with the Local Authority Ecologist'.		
<ul style="list-style-type: none"> Additional text to the policy's 'Irreplaceable habitats' section should make clear that its standing advice should be followed where development affects ancient woodland, ancient trees, or veteran trees. 	The intentions of the policy are considered clear.	No modifications suggested.
<ul style="list-style-type: none"> In line with national planning policy the policy should acknowledge that priority habitats should be conserved, restored and enhanced. 	The policies as drafted promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species.	No modifications suggested.
<ul style="list-style-type: none"> Reference should be made to the protections given to protected species and the need to protect and recover priority species in line with national planning policy. Reference was also sought to the need for development to follow Natural England's standing advice where it has potential to affect protected species. 	The intentions of the policy are considered clear.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> The policy should make clear that development which compromises the recovery of priority species should not be permitted. Cross reference should be made to the Local Nature Recovery Strategy which will identify priority species at a local level. 	<p>Additional references could be made in the explanatory text, updating references to include Local Nature Recovery Strategy.</p>	<p>Suggested additional modification:</p> <p>An additional modification is suggested for para. 9.1.23, explaining that development that compromises the recovery of priority species will be contrary to the policy, and replacing the reference to the Biodiversity Action Plan with a reference to the LNRS.</p>
<ul style="list-style-type: none"> Consideration should be given to a policy for protecting and enhancing soils in line with national planning policy. 	<p>The identified best soils in the city are safeguarded by policy GI4. National policy is applicable to other locations. Policy HW1B guards more generally against the contamination of soil.</p>	<p>No modifications suggested.</p>
<p>Concern that the policy was inconsistent with national planning policy in connection with its fourth paragraph which deals with proposals resulting in significant harm to biodiversity was raised by Knowle West Regeneration Residents Planning Group / Knowle West</p>	<p>The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Future (373), who suggested alternative wording.		
Objection to the part of the policy relating to harm to identified habitats, species and features of importance (second numbered bullet point of the second paragraph) was made by AEW Real Estate Investment Trust (435), CBRE Investment Management (471) and Sovereign Network Group (461). They felt it should allow development in those circumstances where proposals could mitigate harm.	The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure.	No modifications suggested.
The part of the policy relating to mitigation being provided where loss is unavoidable (third paragraph) was objected to by Sovereign Network Group (461), AEW Real Estate Investment Trust and CBRE Investment Management (470). They considered it unnecessary as would be addressed by the biodiversity net gain requirement.	The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure. Biodiversity net gain requirements do not apply to all development.	No modifications suggested.
Expanding the fourth paragraph of the policy was advocated by Bristol Parks Forum (495) to	The policy approach is consistent with national policy requirements to maintain and enhance networks of	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<p>fully cover the process involved in reaching the decision as to whether mitigation is acceptable or not. They also felt that more clarity was needed on the reference to 'significant harm'. They queried whether this assessment of harm would be before or after mitigation has been considered.</p>	<p>habitats and green infrastructure. The need for further guidance will be reviewed over time.</p>	
<p>Various issues were raised on the policy's 'Designated sites - hierarchy' section:</p> <p>'National' sub-section</p> <ul style="list-style-type: none"> • A concern that this section was inconsistent with text in the relevant section of the National Planning Policy Framework was raised by Sovereign Network Group (461), AEW Real Estate Investment Trust and CBRE Investment Management (470). 	<p>The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure and set out a hierarchy of designated wildlife sites.</p>	<p>No modifications suggested.</p>
<p>'Local' sub-section</p> <ul style="list-style-type: none"> • Removal of the word 'significantly' ahead of the reference to 'harmful impact on local wildlife and geological sites' was sought by Friends of Novers Hill and Crox 	<p>The language is consistent with that used in national planning policy.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Bottom (Western Slopes) (155), Knowle West Regeneration Residents Planning Group / Knowle West Future (373), Windmill Hill and Malago Planning Group (174) and around twenty members of the public. A clearer definition of harm was requested.</p>		
<ul style="list-style-type: none"> Bristol Tree Forum (148) regarded the reference to 'significantly harmful impact' as lacking clarity. 	<p>The language is consistent with that used in national planning policy.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Anchor (346) and Sovereign Network Group (461) considered this section should reflect national planning policy which allows development where harm can be mitigated or compensated for. 	<p>The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure and set out a hierarchy of designated wildlife sites.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Redrow Homes Ltd (369) thought the wording too restrictive in relation Sites of Nature Conservation Interest. They felt the focus should be on assessing whether there would be significant harm to the features for which these sites were designated. 	<p>The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure and set out a hierarchy of designated wildlife sites.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
More stringent policy wording was sought by Dr. Antonia Layard (421) and Manor Woods Valley Group (63), e.g. replace 'will be expected' with 'will be required'.	The expectations of the policy are clearly set out in the text.	No modifications suggested.
The need to re-draft the policy to reflect Regulations published by the Government to take effect in February 2024 regarding biodiversity net gain was advised by Bristol Tree Forum (148).	Biodiversity net gain is addressed by policy BG3.	No modifications suggested.
The Home Builders Federation (414) were concerned that the policy's references to biodiversity and mitigation were confusing the separate biodiversity gain mitigation hierarchy with the mitigation hierarchy for protected species and habitats.	The policy sets out principles on mitigation that apply whether or not biodiversity net gain requirements apply.	No modifications suggested.
A failure to reflect the wildlife importance of the Floating Harbour as a nature corridor was of concern to Bristol Business Improvement Districts (423).	Ecological networks are addressed by policy BG1, which makes links to other strategies. The Floating Harbour is identified as a focus area for nature recovery in the emerging Local Nature Recovery Strategy.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<p>A concern that the policy wording lacked clarity was raised by Dominic Hogg (448) and Dr. Antonia Layard (421).</p>	<p>The policy approach is consistent with national policy requirements to maintain and enhance networks of habitats and green infrastructure and set out a hierarchy of designated wildlife sites.</p>	<p>No modifications suggested.</p>
<p>Objection to the following sites / areas being designated as Sites of Nature Conservation Interest was made:</p> <ul style="list-style-type: none"> • gardens in Sidford Road, Bedminster / Knowle West (representation by Northern Slopes Initiative (158)) 	<p>The Sites of Nature Conservation Interest shown in the local plan reflect the master records held by the Bristol Regional Environmental Records Centre.</p> <p>An update has been made to the BRERC record for this SNCI (see 'other suggested main modifications below').</p>	<p>See 'other suggested main modifications below'.</p>
<ul style="list-style-type: none"> • Brislington Meadows, land at Broom Hill (representation by Homes England (231)) 	<p>The Sites of Nature Conservation Interest shown in the local plan reflect the master records held by the Bristol Regional Environmental Records Centre.</p>	<p>No modifications suggested.</p>
<p>Objection to the failure to designate the following sites / areas as Sites of Nature Conservation Interest was made:</p> <ul style="list-style-type: none"> • the wedge of Local Green Space between the two sets of steps between Kingswear Road and Sidford Road (representation by Northern Slopes Initiative (158)) 	<p>The Sites of Nature Conservation Interest shown in the local plan reflect the master records held by the Bristol Regional Environmental Records Centre.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> land north of the River Trym in the section of Trym Valley Open Space East of Trowbridge Road (representation by Geoffrey Poole (60)) 	<p>The Sites of Nature Conservation Interest shown in the local plan reflect the master records held by the Bristol Regional Environmental Records Centre.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> area of land to the west of Haldon Close, which includes the bases of former prefabs, at the back of houses on Lynton Road and below the Novers (representation by Northern Slopes Initiative (158)). 	<p>The Sites of Nature Conservation Interest shown in the local plan reflect the master records held by the Bristol Regional Environmental Records Centre.</p>	<p>No modifications suggested.</p>

Other suggested modifications (Policy BG2)

Main issue raised	Council's comments	Suggested modifications/actions
<p><i>Issue identified by the council.</i></p>	<p>The local sites partnership has identified amendments to four Site of Nature Conservation Interest boundaries to remove changed / developed areas. The master records at the Bristol Regional Environmental Records Centre have been updated.</p>	<p>Suggested main modification:</p> <p>Policies Map</p> <p>Amended SNCI boundaries at:</p> <ul style="list-style-type: none"> Gloucester Road Railway Sidings (raised by Bristol Port)

Main issue raised	Council's comments	Suggested modifications/actions
		<p>Company in representations)</p> <ul style="list-style-type: none"> • Hallen Marsh Junction • Novers Common (land at Sidford Road as raised by Northern Slopes Initiative in representations) • Site west of Concorde Drive

Policy BG3: Achieving biodiversity gains

Representations received: 23 Object: 21 Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
<i>Factual update.</i>	Text is no longer relevant.	<p>Suggested additional modification:</p> <p>Delete text box preceding paragraph 9.1.25.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Concern that the policy was not consistent with recently published Government policy, regulations or guidance on biodiversity net gain was raised by Anchor (346), Dandara Living Developments Ltd (430), Bristol Tree Forum (148), the Home Builders Federation (414) and McCarthy Stone (300).</p>	<p>Update to reflect regulations and national guidance.</p>	<p>Suggested main modification: Policy BG3, policy text, third paragraph Using the Defra Biodiversity Metric, or latest nationally endorsed metric, proposals must demonstrate their ability to achieve biodiversity net gain through a Biodiversity Gain Plan which is required to be submitted alongside a planning application.</p>
<p>Re. the policy's provision that a minimum of 10% biodiversity net gain should be achieved by development proposals:</p> <ul style="list-style-type: none"> • A higher percentage target was sought by Bristol Tree Forum (148), Dominic Hogg (448), Natural England (489) (who advised exploration of a higher requirement, e.g. 20%) and Bristol Parks Forum (495), who suggested 15% for sites adjacent to designated wildlife or open space sites. 	<p>The 10% figure is consistent with national planning policy and represents an appropriate level for the implementation of biodiversity net gain in Bristol.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> the Home Builders Federation (414) considered the policy should require no more than 10%. They felt that a policy which sought over 10% would need to consider site viability, which they thought had not been covered by the Local Plan's Viability Assessment. They were also concerned that the Viability Assessment's consideration of the impacts of a 10% net gain policy was based on out-of-date build costs. 		
<p>The requirement for applications to be accompanied by Biodiversity Gain Plans was opposed by Anchor (346), Sovereign Network Group (461), AEW Real Estate Investment Trust (435) and CBRE Investment Management (471). They felt legislation allowed these to be approved after the granting of planning permission.</p>	<p>Update to reflect regulations and national guidance.</p>	<p>Suggested main modification: Policy BG3, policy text, third paragraph Using the Defra Biodiversity Metric, or latest nationally endorsed metric, proposals must demonstrate their ability to achieve biodiversity net gain through a Biodiversity Gain Plan which is required to be submitted alongside a planning application.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Requiring maintenance of habitat creation and enhancement for at least 30 years was objected to by Dominic Hogg (448) who sought a more relevant period, although did not specify one.	The policy approach reflects the national biodiversity net gain regime.	No modifications suggested.
Amending the policy to make clear that mitigation or compensation for protected species or sites can count towards biodiversity net gain was sought by Anchor (346).	The policy approach reflects the national biodiversity net gain regime.	No modifications suggested.
Removal of the reference to biodiversity credits was sought by Sovereign Network Group (461), AEW Real Estate Investment Trust and CBRE Investment Management (470). They thought the need for credits will only be established through the planning application process so could not be included in a Biodiversity Gain Plan submitted with the application as indicated in the policy (third paragraph, third bullet point).	The policy approach, with suggested modification, reflects the national biodiversity net gain regime.	As set out above.
A potential for confusion between the biodiversity gain mitigation hierarchy referred to in the policy and the separate mitigation	References to the mitigation hierarchy in the policy refer to the biodiversity net gain regime. Mitigation for protected habitats and species is addressed by policy BG2.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<p>hierarchy for protected habitats and species was identified by the Home Builders Federation (414).</p>		
<p>Natural England (489) welcomed that the policy recognises that biodiversity net gain is additional to mitigation for designated sites and that impacts to irreplaceable habitat cannot be mitigated through biodiversity net gain.</p>	<p>Support noted.</p>	<p>No modifications suggested.</p>
<p>Amending the policy's wording in its seventh paragraph was sought by Natural England (489). They thought 'where possible' should be removed from the part of the sentence relating to avoiding harm to designated features. This was on the grounds that protection given to designated habitats and species takes precedence over the delivery of biodiversity net gain, which should not harm designated / protected habitats and species.</p>	<p>The suggested amendment would clarify the relationship with policy BG2.</p>	<p>Suggested additional modification:</p> <p>Policy BG3, policy text, seventh para.</p> <p>Biodiversity remediation and compensation (through habitat creation, restoration and enhancement) should be provided on site, avoiding, where possible, harm to existing designated and non-designated habitat and</p>

Main issues raised	Council's comments	Suggested modifications / actions
		species features of conservation value.
Objection to the provision that off-site biodiversity gains should be provided close to the development site was made by Anchor (346) who thought they could be provided anywhere in England. Conversely, Dominic Hogg (448) considered they must take place within the council's administrative boundary.	Spatial considerations are built into the Biodiversity Metric. As set out in para. 9.1.28, further local guidance on the implementation of biodiversity net gain will be made available in due course.	No modifications suggested.
The need for more detail about the Local Nature Recovery Strategy and the interaction between it and the Local Plan was recommended by the Home Builders Federation (414).	See 'chapter-wide issues' above.	See 'chapter-wide issues' above.
References to the small sites metric and statutory credits were recommended by the Home Builders Federation (414).	Biodiversity credits are referenced in the policy text. A reference to the small sites metric in the explanatory text may be a useful clarification.	Suggested additional modification: Policy BG3, para. 9.1.28 The latest Defra biodiversity metric <u>or, as appropriate, small sites biodiversity metric</u> (or prevailing metric in national policy) can be used to

Main issues raised	Council's comments	Suggested modifications / actions
		consider existing pre-development biodiversity values...
A perceived failure to address how the delivery of biodiversity net gain will be measured and monitored was identified by Bristol Tree Forum (148).	The policy approach reflects the national biodiversity net gain regime.	No modifications suggested.
Greater detail with targets for the implementation and review of this policy were sought by Bristol Conservation Advisory Panel (340).	The policy approach reflects the national biodiversity net gain regime.	No modifications suggested.
The need to re-draft the policy to reflect Regulations published by the Government to take effect in February 2024 regarding biodiversity net gain was advised by Bristol Tree Forum (148).	The policy approach, with suggested modification, reflects the national biodiversity net gain regime.	As set out above.
Concern that the policy did not adequately promote or facilitate offsite biodiversity mitigation opportunities within the council's area was raised by Bristol Tree Forum (148).	The policy approach reflects the national biodiversity net gain regime.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
More precise and stringent wording was recommended by Manor Woods Valley Group (63), e.g. replace 'as close as feasible' with 'adjacent' and 'where possible' with 'must'.	The policy approach reflects the national biodiversity net gain regime.	No modifications suggested.
Bringing forward more quickly the Green Infrastructure Strategy for Bristol was regarded by Bristol Urban Greening (374) as important in capturing local biodiversity enhancement opportunities.	The green infrastructure strategy will be brought forward in due course.	No modifications suggested.
The importance of enhancing / creating features to encourage wildlife occupation of new and existing urban developments was raised by the RSPB (144).	The policy approach reflects the national biodiversity net gain regime. The inclusion of habitat assistance features in new development is addressed by policy BG1.	No modifications suggested.

Policy BG4: Trees

Representations received: 18

Object: 15

Support: 3

Main issues raised	Council's comments	Suggested modifications / actions
Amending the policy to make reference to improving tree canopy cover and increasing tree equity across the city was sought by	The policy refers to improving canopy cover.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Natural England (489). This was in relation to its Green Infrastructure Standard S5: Urban Tree Canopy Cover Standard.		
<p>'Provision of trees' section:</p> <ul style="list-style-type: none"> The reference to ensuring tree lined streets was objected to by CBRE Investment Management (471) and Sovereign Network Group (461) who thought feasibility and viability considerations should be added. 	The reference is consistent with national planning policy.	No modifications suggested.
<ul style="list-style-type: none"> Natural England (489) sought the addition of the word 'all' ahead of the reference to 'practicable opportunities' in the second paragraph. 	The suggested change would be consistent with other policies in the chapter including BG1.	<p>Additional modification suggested:</p> <p>Policy BG4, policy text, second para.</p> <p>The size, species and placement of trees provided as part of the landscape treatment will be expected to take <u>all</u> practicable opportunities to:</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>'Protection and replacement of trees' section:</p> <ul style="list-style-type: none"> • Text requiring the retention of important trees received contrasting views: <ul style="list-style-type: none"> • More flexibility to allow loss in certain circumstances was sought by Anchor (346), CBRE Investment Management (471) and Sovereign Network Group (461) • Strengthening the policy was advocated by Natural England (489) and Dominic Hogg (448), e.g. by removing reference to 'important' trees so that all trees were retained. 	<p>The policy sets out an appropriate balance between relevant considerations.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • The provision relating to ancient woodland and ancient and veteran trees was objected to by Anchor (346), CBRE Investment Management (471) and Sovereign Network Group (461) who felt it was inconsistent with national planning policy regarding the circumstances where development could be allowed. 	<p>It is correct for the local plan to resist the loss of ancient woodland and ancient and veteran trees, as national planning policy only allows their loss or deterioration where there are wholly exceptional reasons. National planning policy will prevail in these situations.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Re. the text that replacement trees should be located as close as possible to the development site, reference to new trees being targeted to areas of low existing tree cover was suggested by Natural England (489). 	<p>The policy approach is considered to be a reasonable approach that allows flexibility for the availability of potential planting locations.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> A lack of definition of 'important trees' was criticised by Anchor (346) and Dominic Hogg (448), with the latter favouring reference to trees that have been in their location for more than 25 years. 	<p>The policy approach is considered to be a reasonable approach that allows a tree to be considered important for a variety of reasons, irrespective of its age.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Following the text which refers to 'tree loss or damage is essential to allow for appropriate development', Natural England (489) thought additional wording should be added to state: '...and has been agreed with the Local Authority Arboriculturist'. 	<p>The suggested wording is not considered appropriate.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Objection to the tree replacement compensation approach and standard was 	<p>The policy approach is considered to be a reasonable approach that works towards maintaining and enhancing tree canopy cover in the city.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>made by Anchor (346), Clifton College (419) and Sovereign Network Group (461):</p> <ul style="list-style-type: none"> A more flexible and pragmatic approach was advocated by Clifton College (419) who made detailed policy text suggestions; 		
<ul style="list-style-type: none"> A concern that the proposed standard lacked sufficient evidence was raised by Anchor (346), CBRE Investment Management (471) and Sovereign Network Group (461), with the former representor of the view that replacement of trees at a rate greater than 1:1 should only be required where practical and appropriate; 	<p>The policy approach is considered to be a reasonable approach that works towards maintaining and enhancing tree canopy cover in the city. With only minor alterations, it represents a continuation of the policy approach in the existing local plan.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Reference in the explanatory text (para. 9.1.39) to the Planning Obligations Supplementary Planning Document (SPD) relating to replacement trees was of concern to CBRE Investment Management (471) and Sovereign 	<p>The reference to SPD is appropriate. It will be updated in due course.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Network Group (461) on the grounds that the SPD did not contain the latest proposed standard.</p>		
<ul style="list-style-type: none"> Amending the policy to allow for a financial contribution to be made where the replacement tree planting cannot be achieved on site was sought by Anchor (346) to assist with development viability. 	<p>The procedure for on and off-site tree replacement is set out in the Planning Obligations Supplementary Planning Document (SPD).</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Stipulations on new replacement trees were sought by John Knight (126): that they should be native species grown in the UK, planted at distances between trees to accommodate mature canopies and include long-term maintenance. 	<p>The policy approach is considered to be a reasonable approach that works towards maintaining and enhancing tree canopy cover in the city.</p>	<p>No modifications suggested.</p>
<p>Reference in the explanatory text (para. 9.1.38) to existing tree cover being deliberately reduced prior to a planning application being submitted was objected to by CBRE Investment Management (471) and Sovereign Network Group (461). They felt there was a lack of clarity on:</p>	<p>The intentions of the policy are clear and represent a similar approach to that taken for biodiversity net gain.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • what evidence would be used to determine whether tree cover had been deliberately reduced; and • what timeframe would be applied for assessing the period prior to the application being submitted. 		
<p>Concerns that the policy was unclear on how it relates to Policy BG3 'Achieving biodiversity gains' was raised by the Home Builders Federation (414). Similarly, Bristol Tree Forum (148) thought the policy did not align with new biodiversity net gain obligations.</p>	<p>The policy approach is considered to be an appropriate approach that works towards maintaining and enhancing tree canopy cover in the city. It represents a continuation of the policy approach in the existing local plan.</p>	<p>No modifications suggested.</p>
<p>A lack of clarity on how the policy's impact on development viability had been assessed was cited by the Home Builders Federation (414) in its objection.</p>	<p>The policy approach is considered to be an appropriate approach that works towards maintaining and enhancing tree canopy cover in the city. It represents a continuation of the policy approach in the existing local plan.</p>	<p>No modifications suggested.</p>
<p>Reference to Right Tree Right Place was advised by Natural England (489).</p>	<p>While this is understood to be a widely used phrase, Right Tree Right Place has no formal definition in national guidance. The principles are embedded within the policy approach.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Text referring to the Forest of Avon Plan and requiring new development to support delivery of it was recommended by Natural England (489).	The policy approach is considered to be an appropriate approach that works towards maintaining and enhancing tree canopy cover in the city.	No modifications suggested.
More stringent and precise wording was recommended by Manor Woods Valley Group (63) and Bristol Tree Forum (148), e.g. replace 'where possible' and 'should' with 'must' and define 'located as close as possible to'.	The policy approach is considered to be an appropriate approach that works towards maintaining and enhancing tree canopy cover in the city.	No modifications suggested.
Reference to veteran trees and areas of ancient woodland being identified on an interactive Policies Map was sought by the Westbury-on-Trym Society (229).	Information on ancient woodland and veteran trees is available elsewhere and is not required to be shown on the Policies Map.	No modifications suggested.
LiveWest (245) requested additional guidance in the policy on street trees, e.g. their installation, while Natural England (489) recommended reference to British Standard BS 8545 in this regard.	There is no national requirement to reference the British Standard. However, the additional guidance may prove useful to applicants.	Suggested additional modification: Policy BG4, para. 9.1.39 Add additional paragraph after 9.1.39 with reference to BS 8545:2014 Trees: from nursery to independence in the landscape.

Main issues raised	Council's comments	Suggested modifications / actions
Including wording referring to retrofitting city centre streets with tree planting was sought by Bristol Urban Greening (374).	The policy approach is considered to be a reasonable approach that works towards maintaining and enhancing tree canopy cover in the city.	No modifications suggested.
Reference to a schedule of suitable street tree species was advocated by Bristol Urban Greening (374).	The policy approach is considered to be a reasonable approach that works towards maintaining and enhancing tree canopy cover in the city.	No modifications suggested.
Providing detail on agreed tree pit construction was recommended by Bristol Urban Greening (374).	The policy approach is considered to be a reasonable approach that works towards maintaining and enhancing tree canopy cover in the city.	No modifications suggested.
Reference to Natural England's Green Infrastructure Standard for Tree Canopies was advised by Bristol Business Improvement Districts (423).	The policy refers to improving canopy cover. In policy BG1, specific standards are set against the Urban Greening Factor. The other Natural England Green Infrastructure Standards, while not prescribed in specific detail by the policy, may prove helpful to applicants in formulating their Green Infrastructure Statements.	No modifications suggested.
Text to identify the link between trees, climate mitigation and health was requested by Bristol Business Improvement Districts (423), e.g. the type and location of trees to be informed by Keep Bristol Cool urban heat mapping.	The policy approach is considered to be an appropriate approach that works towards maintaining and enhancing tree canopy cover in the city. Policy BG1 makes clear links between green infrastructure, health and climate benefits.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Emphasising the importance of a long-term maintenance strategy for trees was urged by Bristol Business Improvement Districts (423).	The policy requires applicants to set out appropriate measures to secure the long-term maintenance of newly-planted trees.	No modifications suggested.
Locating trees in carriageways rather than on pavements where possible was sought by Bristol Business Improvement Districts (423).	The reference to tree-lined streets is consistent with national planning policy and provides sufficient flexibility for the most appropriate solution to be achieved for each case.	No modifications suggested.

Other suggested modifications (Policy BG4)

Main issues raised	Council's comments	Suggested modifications/actions
<i>Issue identified the council.</i>	The minimum trunk size diameter specified in the tree replacement standard is marginally inconsistent with that used in relation to both Biodiversity Net Gain and conservation area notifications.	Suggested main modification: Policy BG4 p.131, tree replacement standard table Change minimum existing trunk diameter from 7cm to <u>7.5cm</u> .

Policy BG5: Biodiversity and access to Bristol's waterways

Representations received: 12 Object: 10 Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
Support was received from Natural England (489) and Bristol Urban Greening (374).	Support noted.	No modifications suggested.
References to how water quality will be protected or enhanced were sought by the Environment Agency (465).	Protecting and enhancing water quality is mentioned in the policy (and also covered by policy HW1). Many of the other measures in the policy would support this.	No modifications suggested.
Referring to Water Framework Directive objectives was advocated by the Environment Agency (465), e.g. how heavily modified waterbodies and obstructions may prevent good ecological status from being achieved.	The Water Framework Directive is addressed by policy HW1.	No modifications suggested.
In order to reflect the implications of the new statutory biodiversity net gain metric and how it considers watercourses, there was a need to revisit the policy wording according to the Home Builders Federation (414).	Biodiversity Net Gain is addressed by policy BG3.	No modifications suggested.
Inconsistency with national planning policy was raised by Anchor (346) in its objection. They considered that the provision which expected the conservation of waterways and adjacent land did not accord with national policy which allowed mitigation and	The policy should be read alongside policies BG1 and BG2 which will put the requirement into context.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
compensation if harm to biodiversity could not be avoided.		
Reference to delivering additional flood resilience measures (second criterion in numbered list) was objected to by Sovereign Network Group (461). They felt it should acknowledge considerations of viability, its relationship to the development and whether it was necessary to make the development acceptable.	The policy wording incorporates appropriate flexibility.	No modifications suggested.
A lack of flexibility was cited by Anchor (346) in its objection. They referred to the provision that development would be expected to maintain, enhance and create green infrastructure for walking and cycle (fourth criterion in numbered list) and considered that this would not always be feasible or viable.	The approach broadly continues that of existing local plan policy DM22. The provision of green infrastructure complements access requirements for maintenance and other policy objectives including flood attenuation and water quality.	No modifications suggested.
An objection to the policy was made by CBRE Investment Management (471) and Sovereign Network Group (461) who felt its recreational and biodiversity objectives could not be	The objectives of the policy reflect recreation and biodiversity considerations and are achievable.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
mutually achieved and so should be separated into distinct policies.		
Regarding the explanatory text concerning canted, colonnaded and floating waterside walkway solutions (para. 9.1.43), CBRE Investment Management (471) and Sovereign Network Group (461) sought the inclusion of text to make clear that the council would facilitate and support the viability of any waterside walkway on land it owns. It also sought clarity that such walkways would not be required where the waterway falls within the Crown's ownership.	The text refers to one solution that may be considered and is not prescriptive.	No modifications suggested.
Objection to areas no longer being designated in the Local Plan as Wildlife Corridors was made by Bristol Business Improvement Districts (423).	See 'chapter-wide issues'.	See 'chapter-wide issues'.
Stronger emphasis on creating areas for people to sit in balance with improvements to biodiversity was advocated by Bristol Business Improvement Districts (423).	The policy makes specific reference to seating in relation to city centre quayside walkways.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
More stringent wording was sought by Bristol Parks Forum (495) and Manor Woods Valley Group (63), with 'required to' being preferred to 'expected to'.	The expectations of the policy are clearly set out in the text.	No modifications suggested.
A perceived lack of clarity in the policy wording was of concern to Dominic Hogg (448).	The expectations of the policy are clearly set out in the text.	No modifications suggested.

Policy BG6: Private gardens

Representations received: 5

Object: 5

Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
An additional criterion to allow development leading to the loss of gardens was sought by WeCanMake (446). This related to proposals for community-led affordable housing which safeguards the amenity of existing development.	Policy BG6 reflect a policy in the existing local plan. Criteria i). and ii). would be relevant to appropriate proposals for community-led development.	No modifications suggested.
Additional text to the policy's first criterion was suggested by the Westbury-on-Trym Society (229) to ensure other Local Plan policy	The issues raised are addressed by other policies in the local plan.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
objectives were met by development proposals in gardens; namely biodiversity, green infrastructure, liveability, flood risk and water management.		
Regarding the policy's reference to development involving front gardens, provisions which addressed the treatment of balconies facing the public realm were sought by Bristol Business Improvement Districts (423), including their greening to enhance visual impact.	The policy does not apply to the treatment of balconies.	No modifications suggested.
A perceived lack of clarity in the policy wording was of concern to Dominic Hogg (448).	The expectations of the policy are clearly set out in the text.	No modifications suggested.

Policy BG7: The St. Paul's green link

Representations received: 5

Object: 3

Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
More stringent policy text was sought by Dominic Hogg (448), e.g. 'requiring' rather than 'expecting'.	The expectations of the policy are clearly set out in the text.	No modifications suggested.
Bristol Business Improvement Districts (423) thought a map could be included to indicate the link's route.	The link is shown on the Policies Map.	No modifications suggested.
Support was received from Friends of St Andrews Park (125).	Support noted.	No modifications suggested.

Open space

Policy GI A: Open space for recreation

Representations received: 14 Object: 13 Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
Concerns were raised about the policy's evidence base, with AEW UK Investment Management (458), Bristol Civic Society (285), Bristol Tree Forum (148) and Knowle Neighbourhood Planning Group (372) noting	The Parks and Green Spaces Strategy and Food Growing and Allotments Strategy forms part of the evidence document for this policy.	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
the absence of an up-to-date assessment of the need for open space.		
The policy's failure to set quantity and quality standards for open space provision was raised by Dandara Living Developments Ltd (430), AEW UK Investment Management (458) and Bristol Civic Society (285) in their objections.	The Parks and Green Spaces Strategy and Food Growing and Allotments Strategy sets the relevant guidelines to be use in conjunction with this policy.	No modifications suggested
<p>A lack of clarity in the policy was raised by a number of representors:</p> <ul style="list-style-type: none"> Reference to 'council's strategies' in the policy text was queried by Bristol Civic Society (285), Bristol Parks Forum (495), Bristol Tree Forum (148) and Dandara Living Developments Ltd (430). 	The relevant council strategies are currently the Parks and Green Spaces Strategy and Food Growing and Allotments Strategy .	No modifications suggested
<ul style="list-style-type: none"> A failure to define thresholds regarding an 'appropriate minimum size and quality' in the policy's first criterion relating to the provision of open space for recreation was objected to by AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment 	This is set out in the Parks and Green Spaces Strategy and Food Growing and Allotments Strategy .	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
Management, Taylor Wimpey (482) and Sovereign Network Group (461).		
<ul style="list-style-type: none"> Concern that the reference to 'suitable long-term maintenance programme' in the fifth criterion lacked adequate timeframe precision was of concern to AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management, Taylor Wimpey (482) and Sovereign Network Group (461). 	The plan's requirement for a suitable long-term maintenance programme is appropriate. This wording is used in the adopted local plan, Policy DM16.	No modifications suggested
<ul style="list-style-type: none"> A definition of 'accessible' open space was sought by Fishponds Community Planning Group (190). 	Wording is considered clear and appropriate.	No modifications suggested
<ul style="list-style-type: none"> Dominic Hogg (448) considered the policy 'nebulous'. 	Further detail is given in the Parks and Green Spaces Strategy and Food Growing and Allotments Strategy .	No modifications suggested
More stringent wording was sought by Bristol Parks Forum (495) with 'required to' preferred to 'expected to'.	Wording is appropriate with the policies intentions made clear.	No modifications suggested
The absence of proposals for significant new public open spaces and / or recreation areas	This policy addressed the creation of open space. Approaches to open space are set out in relevant	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
was of concern to Bristol Tree Forum (148) and Friends of St Andrews Park (125).	development strategy policies and within some development allocations.	
The reference in para. 9.2.2 to the overall proportion of open space being maintained should also include 'and enhanced' according to Bristol Parks Forum (495).	This reference is considered an accurate statement of the effect of local plan policies.	No modifications suggested
Regarding the provision of recreational spaces, specific requirements were sought by John Knight (126) for hard surface and grassed areas, as well as children's play, walking and mountain biking areas.	Other facilities will be addressed through Policy CF1. The facilities referred to are often integral to open space for recreation.	No modifications suggested

Policy G1: Local Green Space

Representations received: 100

Object: 39

Support: 61

Main issues raised	Council's comments	Suggested modifications / actions
<p>Objection was made to the failure to designate as Local Green Space the following areas / sites:</p> <ul style="list-style-type: none"> • All Reserved Open Green Space sites (representation by Friends of Badock's Wood (456)) • All Sites of Nature Conservation Interest (representation by Bristol Tree Forum (148) and Bristol Parks Forum (495)) 	<p>The approaches suggested are not in line with the criteria set out in the Local Green Space and Reserved Open Green Topic Paper. Specific policies are applicable to site of nature conservation interest.</p>	<p>No modifications suggested</p>
<ul style="list-style-type: none"> • An area of land adjacent to the River Frome extending to the South Gloucestershire boundary, adjoining Lincombe Barn Woods (representation by Fiona Glead (287)) 	<p>This site is different in character from that of the Local Green Space Oldbury Court Estate (LGS15005) to the west and does not meet the criteria set out in the Local Green Space and Reserved Open Green Topic Paper.</p>	<p>No modifications suggested</p>
<ul style="list-style-type: none"> • Bracey Drive open space (representation by Nick Lee (180), Kelly Lee (181), Chris Jarvis (182), Laura Jarvis (183), Pauline 	<p>These sites do not meet the criteria for Local Green Space set out in the Local Green Space and Reserved Open Green Topic Paper.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Twomey (184), Andrew Searle (185) and Fari Lonergan (186))</p> <ul style="list-style-type: none"> • Bristol to Bath Railway Path (representation by Owen Square Park Pals (462), Liz Beth (214), Poppy Keeling (246), Rachael Bee (263), Sophia Walcot-Earle (274) and Nikki Petch (264)) • Malago Riverside walk, north of Cotswold Road (representation by Windmill Hill and Malago Planning Group (174)) • Oldbury Court Estate: <ul style="list-style-type: none"> • footpath on left bank of River Frome leading to wildlife area behind Lincombe Barn • the area along the treeline on Sheldrake Drive (representation by Friends of the Park (Oldbury Court Estate) (295)) • Providence Place / Bedminster Green (representation by Windmill Hill and Malago Planning Group (174)) 		

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • Cumberland Piazza and other Sylvia Crowe-designed green spaces in Cumberland Basin (representation by Hotwells and Cliftonwood Community Association (261), Ginny Mason (319) and Cumberland Basin Stakeholder Group (398)) • Green open spaces around the Floating Harbour and the A and B Bond warehouse buildings in the Hotwells / Western Harbour area (representation by Hotwells and Cliftonwood Community Association (261) and Ginny Mason (319)) 	<p>The approach to open space in Western Harbour is set out in Policy DS4: Western Harbour.</p>	<p>No modifications suggested</p>
<ul style="list-style-type: none"> • Southmead: <ul style="list-style-type: none"> • Trym Valley Open Space • Green Land at Greenway Centre • Westbury Wildlife Park • Southmead Allotments (representation by Friends of Badock's Wood (456)) 	<ul style="list-style-type: none"> • Trym Valley Open Space, Green Land at Greenway Centre and Southmead Allotments do not meet the criteria for Local Green Space set out in the Local Green Space and Reserved Open Green Topic Paper. • Westbury Wildlife Park is part of Badocks woods, LGS26001. 	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Objection was made to the following areas / sites proposed for Local Green Space designation:</p> <ul style="list-style-type: none"> • Land at Henbury adjoining Kings Weston Lane (representation by Stride Brothers Ltd (21)) • Land at Lamplighters Marsh, Shirehampton (representation by Mr N. Bracey (452)) • Stoke Lodge (representation by Cotham School (168)) 	<p>These sites have met the criteria found in the Local Green Space and Reserved Open Green Topic Paper and therefore Local Green Space is an appropriate designation.</p>	<p>No modifications suggested</p>
<p>Support was received for the following areas / sites proposed for Local Green Space designation:</p> <ul style="list-style-type: none"> • 'Northern Slopes': <ul style="list-style-type: none"> • 'The Bommie' (Wedmore Vale between Daventry Road, Beckington Road, Wedmore Vale and Wingfield Road), Bramble Farm (between Stockwood Crescent and Beckington Road) 	<p>Support noted.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • Glyn Vale between Glyn Vale, Wedmore Vale and Kenmare Road • Kingswear Road Open Space between Glyn Vale and Oakhill Drive and Sidford Road • Novers Common/Steps between Novers Hill, Lynton Road and the Health Park as Local Green Space (representation by Northern Slopes Initiative (158)) • 'The Novers': <ul style="list-style-type: none"> • areas located between the Knowle West Health Park, Haldon Close, Kingswear Road and the Novers Steps (representation by Knowle West Regeneration Residents Planning Group / Knowle West Future (373) and Northern Slopes Initiative (158)) • Shirehampton: 		

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • Lamplighter's Marsh Local Nature Reserve; • Nibley Road Open Space and Lamplighter's Open Space; • The Daisy Field.(representation by John Knight (126)) • Southmead: <ul style="list-style-type: none"> • Badock's Wood • Doncaster Road Park • Henleaze Lake • Pen Park Open Space • Elderberry Walk Open Space (representation by Friends of Badock's Wood (456)) • Stoke Lodge (representation by over thirty members of the public) • Troopers Hill: <ul style="list-style-type: none"> • Troopers Hill Local Nature Reserve 		

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • Troopers Hill Field • Troopers Hill Woodland and • Blackswarth Road Wood (representation by Friends of Troopers Hill (149)) • 'Western Slopes' / Novers Hill sites allocated for housing or industry and warehousing in the current Local Plan: <ul style="list-style-type: none"> • BSA1108 - Land at Novers Hill, east of Hartcliffe Way and west of Novers Lane/ Novers Hill • BSA1114 - Land at Novers Hill, adjacent to industrial units • BSA1119 - Land to east of Hartcliffe Way, south of the Waste Depot (representation by Knowle West Regeneration Residents Planning Group / Knowle West Future (373), Friends of Novers Hill and Crox Bottom (Western Slopes) (155), Catherine Withers (153), Jim Mayger (97), June Goulding (103), 		

Main issues raised	Council's comments	Suggested modifications / actions
<p>Holly Tipping (104), Tim Marriner (105), Jasmine Beard (107), Fran Whitlock (110), Thomas Lewis (111), Julia Halpenny (113), Sue Chubb (124), Bridget Bennett (154), Hilary Rydon (156), Anna Tucker (98), Catherine Robson (150), Luke Collins (152), Richard Sawyer (165), Nick Smith (293), Nasim Dumont (330), Gerard Spillane (348), James Drozd (351), Alison Parker (333), Danielle McKenzie (335), Martyn Cordey (359), Gerard Spillane (348) and Tony Pitt (317))</p>		
<p>Regarding the policy text's second sentence and the assessment of harm, Bristol Parks Forum (495) thought additional reference should be made to the impact of development on the Local Green Space's 'existing functions'.</p>	<p>The policy refers to the green space's role, therefore it is not necessary to refer to function.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
To improve its clarity, adding 'within Local Green Space' into the policy text after 'Ancillary development' was suggested by Dandara Living Developments Ltd (430).	The policy is referring to ancillary development within local green space.	No modifications suggested
Support for not designating New Oak Primary School and the John Williams Secondary School and its surrounding land as Local Green Space (or any other Local Plan open space designation) was made by Oasis Community Learning (378). Your Park Bristol & Bath (395) and Manor Woods Valley Group (63) offered support to the policy.	Support noted.	No modifications suggested
Bristol Tree Forum (148) considered that 84 sites which were designated in the current Local Plan as Important Open Space are not proposed for Local Green Space or Reserved Open Green Space designation under the new Local Plan. It also stated that 24 current allotments are not proposed for Local Green Space or Reserved Open Green Space designation.	Local Green Space is defined in national policy and is therefore different to Important Open Space. Spaces have been considered against the criteria relevant to the new policy designations.	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
The need to re-draft the policy to reflect Regulations published by the Government to take effect in February 2024 regarding biodiversity net gain was advised by Bristol Tree Forum (148).	Matters involving biodiversity are dealt with in Policy BG3.	No modifications suggested
A consistent definition of open space which ensures it is accessible was sought by Dr. Antonia Layard (421).	The issue of accessibility is set out in the Local Green Space and Reserved Open Green Topic Paper .	No modifications suggested
Whether playing pitches were protected as Local Green Space was unclear to Sport England (485).	The Local Green Space and Reserved Open Green Topic Paper shows that playing pitches have generally been categorised as Reserved Open Green Space.	No modifications suggested

Policy GI2: Reserved Open Green Space

Representations received: 45 Object: 24 Support: 21

Main issues raised	Council's comments	Suggested modifications / actions
Objection was made to the following areas / sites proposed for Reserved Open Green Space designation:	These sites meet the criteria set out in the Local Green Space and Reserved Open Green Topic Paper and therefore Reserved Open Green Space is an appropriate designation.	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • Brislington Meadows, land at Broom Hill (representation by Homes England (231)) • Clifton College's Main Campus and College Fields playing fields (representation by Clifton College (419)) • Land at Glenside Campus (representation by University of the West of England (408)) • Land at Golden Hill (representation by Bristol Grammar School (422)) 		
<p>Objection was made to the failure to designate as Reserved Open Green Space the following areas / sites:</p> <ul style="list-style-type: none"> • Cluster of trees adjacent to Frenchay Road at Frome Vale Academy (representation by Fiona Gleed (287)) • Eastern and western areas of open space with boundary trees / hedges at Begbrook Primary Academy (representation by Fiona Gleed (287)) 	<p>These sites do not meet the criteria set out in the Local Green Space and Reserved Open Green Topic Paper and therefore a Reserved Open Green Space would not be appropriate.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • Grassland alongside Sheldrake Drive, Stapleton (representation by Fiona Gleed (287)) • Open green space between Marshall Walk and the Inns Court Community Centre (representation by Knowle West Regeneration Residents Planning Group / Knowle West Future (373)) • Open green space outside St Barnabas Church, Daventry Road (representation by Knowle West Regeneration Residents Planning Group / Knowle West Future (373)) • Open green space within the Knowle West Health Park (representation by Knowle West Regeneration Residents Planning Group / Knowle West Future (373)) • Open green space in the centre of Melvin Square (representation by Knowle West Regeneration Residents Planning Group / Knowle West Future (373)) • 'The Green', Freeland Place, Hotwells between no.s 23 and 26 on the south side 		

Main issues raised	Council's comments	Suggested modifications / actions
of the road (representation by Sandra Fryer (95))		
<ul style="list-style-type: none"> Area of land to the west of Haldon Close, which includes the bases of former prefabs, at the back of houses on Lynton Road and below 'the Novers' (representation by Northern Slopes Initiative (158)) 	The site is an SNCI so would be subject to Policy BG2. The site would meet the NPPF definition of an open space.	No modifications suggested
<ul style="list-style-type: none"> Land proposed to be allocated for housing under Policy DA1: 'Proposed development allocations', development allocation ref. BDA1302 'Land south of Rose Green Close, Clay Hill' (representation by Gillian Lowe (259)) 	This site is a development allocation and is therefore dealt with by Policy DA1.	No modifications suggested
<ul style="list-style-type: none"> Open green space to the west of Manning Road known as Filwood Park (representation by Knowle West Regeneration Residents Planning Group / Knowle West Future (373)) 	The site was created as part of a previous local plan site allocation (BSA1110) for housing and open space. The site has recently gone through development creating the housing and new park. The new park meets the criteria for Local Green Space designation.	Suggested main modification: Policies Map <u>Filwood Park</u> to be designated as Local Green Space (Policy GI1) to be shown on the Policies Map.

Main issues raised	Council's comments	Suggested modifications / actions
<p>Support was received for the following areas / sites proposed for Reserved Open Green Space designation:</p> <ul style="list-style-type: none"> • Brislington Meadows (representation by Friends of Novers Hill and Crox Bottom (Western Slopes) (155), Jim Mayger (97), Richard Sawyer (165), Nick Smith (293), Martyn Cordey (359), Luke Collins (152), Anna Tucker (98), June Goulding (103), Holly Tipping (104), Tim Marriner (105), Jasmine Beard (107), Fran Whitlock (110), Thomas Lewis (111), Julia Halpenny (113), Sue Chubb (124), Catherine Withers (153), Bridget Bennett (154) and Hilary Rydon (156) • Green space outside the shops on Gill Avenue (representation by Friends of the Park (Oldbury Court Estate) (295)) 	<p>Support noted.</p>	<p>No modifications suggested</p>
<p>Concern about a lack of clarity in the policy's first criterion was raised by the Parochial Church Council of St Mary Redcliffe (399) in its objection. They thought the reference to 'open space function' did not give a clear</p>	<p>Policy wording adequately clear.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>indication of the function and value to be assigned to these spaces for the purposes of assessing development proposals.</p>		
<p>Additional policy criteria were suggested by two representors:</p> <ul style="list-style-type: none"> • the Parochial Church Council of St Mary Redcliffe (399) suggested detailed text in support of the principle of allowing ancillary development in those circumstances where areas of Reserved Open Green Space were ancillary to community facilities on the wider site. • Bristol Grammar School (422) advocated text which would allow the loss of Reserved Open Green Space where it could be appropriately mitigated. 	<ul style="list-style-type: none"> • The policy states that ancillary development is acceptable under certain circumstances. • The policy states that Reserved Open Green Space can be developed should it no longer be required for its open space function and should it not lead to a deficiency in open space. 	<p>No modifications suggested</p>
<p>Clifton College (419) advocated amendments to the policy criteria:</p> <ul style="list-style-type: none"> • They thought that either of the criteria could be met to allow the loss of land 	<ul style="list-style-type: none"> • The council considers Reserved Open Green Space to be open space of community value therefore it is important that it is only developed should it meet both of the criteria. • Details of how the issue of public access has been dealt with in designating Reserved Open Green Space 	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>designated as Reserved Open Green Space rather than both.</p> <ul style="list-style-type: none"> • They sought the addition of 'publicly accessible' ahead of 'open space provision' in the second criterion to reflect the fact that their site is not accessible to the public. 	<p>is found in the Local Green Space and Reserved Open Green Topic Paper.</p>	
<p>Deleting the policy's second criterion was advocated by the Parochial Church Council of St Mary Redcliffe (399). They objected to its reference to Policy GI A 'Open space for recreation' as they considered that policy related to the provision of open space in new development rather than existing open areas.</p>	<p>This is a reference to the council strategies as mentioned in Policy GIA, therefore it is necessary.</p>	<p>No modifications suggested</p>
<p>Bristol Tree Forum (148) considered that 84 sites which were designated in the current Local Plan as Important Open Space are not proposed for Local Green Space or Reserved Open Green Space designation under the new Local Plan. It also stated that 24 current allotments are not proposed for Local Green</p>	<p>Important Open Space is a different policy, the criteria for Reserved Open Green Space is set out in the Local Green Space and Reserved Open Green Topic Paper.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
Space or Reserved Open Green Space designation.		
The need to re-draft the policy to reflect Regulations published by the Government to take effect in February 2024 regarding biodiversity net gain was advised by Bristol Tree Forum (148).	Matters involving biodiversity are dealt with in Policy BG3.	No modifications suggested
Concern that the policy lacked clarity was raised by Dominic Hogg (448), who questioned how a deficiency in open space provision could be assessed.	The policy set out that GIA will be used to help understand deficiencies in open space, this is set out in council strategies.	No modifications suggested

Other suggested modifications (Policy GI2)

Main issues raised	Council's comments	Suggested modifications/actions
<i>Issue identified by the council.</i>	There is an inconsistency in the boundary of a Reserved Open Space due to permitted/implemented residential development on part of 'Railway Line at Ashton Vale ROGS03012 north of South Liberty Lane, east of Swiss Drive and west of Liberty Industrial Park.	Suggested main modification: A section of proposed ROGS03012 has seen a planning application (15/06617/F) approved at appeal. These homes are

		currently under construction, therefore it would be inappropriate to designate the section as a Reserved Open Green Space (Policy G12).
--	--	---

Policy G13: Incidental Open Spaces

Representations received: 10

Object: 9

Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
The policy was welcomed by Your Park Bristol & Bath (395) and CPRE Avon and Bristol (492), although the latter representor was concerned whether it would be effective in protecting these spaces.	Support noted.	No modifications suggested
Additional policy text to prevent the loss of incidental open space if the local community had not been consulted was sought by Knowle West Regeneration Residents Planning Group / Knowle West Future (373), Knowle Neighbourhood Planning Group (372) and Bristol Parks Forum (495).	The local plan contains policies for incidental open space (G13).	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
An approach which prevented the loss of any incidental open space was suggested by Dominic Hogg (448).	The local plan contains policies for incidental open space (GI3).	No modifications suggested
<p>Objections to this policy raised the following concerns:</p> <ul style="list-style-type: none"> • too restrictive (representation by Gloucestershire County Cricket Club (447), Taylor Wimpey (347) and Sovereign Network Group (461)); • lacking clarity in its definitions (representation by Gloucestershire County Cricket Club (447)); • inadequate evidence to justify approach (representation by Taylor Wimpey (347) and Sovereign Network Group (461)); • unnecessary as protection of such spaces on housing estates would be controlled by a management company in accordance with legal obligations (representation by Taylor Wimpey (347) and Sovereign Network Group (461)); 	The approach is an appropriate continuation of current local plan policy DM17 which has provisions regarding 'unidentified open spaces'.	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> inconsistent with protection of the local environment and meeting housing need (representation by Stride Brothers Ltd (21)). 		

Policy GI4: Stapleton allotments and holdings – food growing Local Green Space

No representations received.

Transport

Policy T1: Development and transport principles

Representations received: 11 Object: 8 Support: 3

Main issues raised	Council's comments	Suggested modifications / actions
<p>Hotwells and Cliftonwood Community Association (261) were critical of a lack of strategic transport policy setting out the city-region's traffic and transport needs and how these impact on the city in relation to the requirements needed from individual schemes.</p>	<p>The local plan sets out an appropriate suite of transport policies with regard to its role as part of the development plan.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Lack of reference to a coach park was of concern to Visit West - Local Visitor Economy Partnership (306) in relation to the contribution visitors arriving by coach make to the city's economy.	The local plan does not include proposals for a coach park. Matters regarding coach parking would be addressed through other separate transport infrastructure development processes.	No modifications suggested.
More stringent policy wording was sought by Bristol Cycling Campaign (416) and David Gray (303), e.g. development 'must' rather than 'should'.	The expectations of the policy are clearly set out in the text. In national planning policy language, 'must' is reserved for matters of specific legal compliance.	No modifications suggested.
Specific additions / amendments were sought by Bristol Business Improvement Districts (423):		
<ul style="list-style-type: none"> • Include a Transport Hierarchy to set out the prioritisation of transport modes for the city; 	<p>Policy T1 sets out the transport development principles for consideration in all new proposals for development. The policy aims to minimise the need to travel, especially by private vehicle and maximise opportunities for walking, cycling and the use of public transport.</p> <p>Policy T3A sets out the transport and traffic considerations that development proposals should address.</p>	No modifications suggested.
<ul style="list-style-type: none"> • Reference the target of zero road deaths by 2030; 	Policy T3A sets out the transport and traffic considerations that development proposals should address; including	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
	reference to the Council's statutory duty to maintain road safety.	
<ul style="list-style-type: none"> Adopt the Healthy Streets approach as a formal assessment of street design and transport schemes. 	Healthy Streets is one of the tools that the City Council use in assessing street design and is referred to in the TDMG.	No modifications suggested.
<ul style="list-style-type: none"> Refer to health in relation to the contribution that transport can make to improving health outcomes. 	The approach in the policy will help to create environments which are safer and healthier and maximise opportunities for walking and cycling and reduce the negative impacts of vehicles. Health is referred to throughout the transport chapter. The impact of new development on air quality is addressed in Policy HW2.	No modifications suggested.
<ul style="list-style-type: none"> They also supported the development of a Bristol Transport Plan. 	The Bristol Transport Strategy was published 2019.	No modifications suggested.
John Knight (126) sought greater emphasis on how the policy will enhance the safety of vulnerable road users on new and existing routes.	Policy T3A sets out the transport and traffic considerations that development proposals should address; including reference to the Council's statutory duty to maintain road safety. The TDMG also covers this subject in detail.	No modifications suggested.

Policy T2: Transport infrastructure improvements

Representations received: 6

Object: 2

Support: 4

Main issues raised	Council's comments	Suggested modifications / actions
<p>The lack of a strategic transport evidence base to inform the policy and identify any impacts on the strategic road network was of concern to National Highways (473). Similarly, Bath and North East Somerset Council (496) noted they were unable to identify detailed assessment of the transportation impacts of the proposals, in particular on its network.</p>	<p>The development strategy locates new residential and other forms of development within the urban area and with a focus on regeneration areas in the core of the city. This is consistent with national planning policy. The policy approach in the local plan provides sufficient opportunities for appropriate mitigation for Bristol City Council and other highway authorities impacted. The transport model is currently subject to its run process. A detailed report on the WERTM modelling will be issued shortly.</p>	<p>No modifications suggested.</p>
<p>Clarity on the relationship between the policy and the Infrastructure Delivery Plan was sought by National Highways (473). For example, a Park & Ride for the M32 is referenced in the Infrastructure Delivery Plan Draft with delivery by 2027 but not included in the policy.</p>	<p>The policy sets out support for the delivery of significant improvements to transport infrastructure. The Infrastructure Delivery Plan outlines the infrastructure that is needed to support the growth in the city set out in the local plan. It includes some transport improvements which are subject to ongoing scheme development and therefore, not all site details are known. Policy T2A safeguards the known land required for potential future transport and movement infrastructure.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Natural England (489) highlighted the importance of ensuring any transport improvements create and enhance links to greenspace, countryside and the green infrastructure network.	Links to green space and the green infrastructure network are addressed in other local plan policies. Policy T5 seeks the protection and enhancement of public rights of way and Policy T6 sets out how development proposals should facilitate and where possible improve access to the network of Active Travel Routes.	No modifications suggested.
The potential for high carbon emissions in the construction of major transport infrastructure improvements, such as a new mass transit network, was of concern to Dominic Hogg (448).	Policy NZC1 aims to ensure that new development mitigates its contribution towards the causes of climate change including embodied and operational carbon emissions.	No modifications suggested.

Policy T2A: Protected transport and movement routes

Representations received: 5 Object: 5 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Objection to the proposed Rail Infrastructure safeguarding for land in St Philip's / Lawrence Hill to the south of the Bristol and Bath Railway Path was made by:		

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Frank Bruce and Company Limited (493), who considered it should be removed as was unjustified and could hinder the achievement of the wider growth and regeneration objectives of the surrounding area; 	<p>The process to identify land safeguarded for rail infrastructure was informed by discussions with Network Rail.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Old Market Community Association (233), who thought it had been unused for rail for many years and should be safeguarded as a future cycle route. 	<p>See above.</p>	<p>No modifications suggested.</p>
<p>Regarding the proposed Safeguarded Transport Link designation for the Callington Road link on former railway line land in Brislington:</p> <ul style="list-style-type: none"> Dominus Real Estate (289) queried the evidence to justify this designation; 	<p>The scheme is included within JLTP4 and the major scheme list. The WECA business case development is currently underway for the A4 Mass Transit project. This includes options for using the area identified on the policies map for improved sustainable transport provision.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Sovereign Network Group (461) thought specific text should be added to make clear support would be given for active travel infrastructure and that proposals for new infrastructure for private cars would be opposed. 	See above.	No modifications suggested.
Amending the policy text to make clear that, where new transport infrastructure is proposed within a safeguarded area, active and sustainable travel modes will be prioritised and new roads for cars supported only exceptionally was urged by Sovereign Network Group (461).	The purpose of the policy is to safeguard land required for potential future transport infrastructure.	No modifications suggested.

Policy T3A: Transport development management

Representations received: 2 Object: 2 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> The policy text's first criterion regarding securing low vehicle speeds was objected to by National Highways 	The criterion is considered appropriate in addressing safe and adequate access.	No modifications suggested.

<p>(473). They thought an amendment was needed to address developments which affect the strategic road network where securing low speeds would not be appropriate.</p>		
<ul style="list-style-type: none"> An addition to the last sentence of the policy text was requested by National Highways (473): <i>“Proposals should be supported by a Transport Assessment/Statement and/or a Travel Plan where development is likely to have a significant traffic impact <u>and/or</u> road safety impact.”</i> 	<p>This is outlined in the Transport Development Management Guidance.</p>	<p>No modifications suggested.</p>

Policy T4A: Parking, servicing and the provision of infrastructure for electric vehicles

Representations received: 7

Object: 5

Support: 2

Main issues raised	Council’s comments	Suggested modifications / actions
<p>Concerns about the appropriateness of deferring policy guidance and standards to a forthcoming Transport Supplementary Planning Document were raised by Legal and General (409), Sovereign Network Group (461),</p>	<p>The policy indicates that any standards will be set out in a supplementary document. This is appropriate and is consistent with the approach of many local plans.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
AEW UK Real Estate Investment Trust and Taylor Wimpey (483).		
Lack of evidence that the policy had been viability tested was raised by Legal and General (409).	Relevant issues relating to viability are set out in the <u>Bristol City council: Local Plan Viability Assessment</u> .	No modifications suggested.
Removal of the policy's 'Electric vehicle charging' section was urged by the South West Housing Association Planning Consortium (439). They thought it duplicated measures required for compliance with building regulations.	Inclusion of electric vehicle charging within the policy is a national requirement.	No modifications suggested.

Other suggested modifications (Policy T4A)

Main issues raised.	Council's comments	Suggested modifications/actions
<i>Issue identified by the council.</i>	Clarification suggested for explanatory text to Policy T4A at para. 10.37.	Suggested additional modification: Policy T4A, para 10.37 Waste storage requirements including access are found in

Main issues raised.	Council's comments	Suggested modifications/actions
		the Council's Waste Guidance for New Developments (or subsequent update). <u>Waste and Recycling Storage and Collection Facilities Guidance for Developers of New Residential, Commercial and Mixed Use Properties (or subsequent update).</u>

Policy T5: Public rights of way

Representations received: 1

Object: 1

Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Rather than only protecting and enhancing public rights of way, CPRE Avon and Bristol (492) thought the first sentence of the policy text should be strengthened to include reference to increasing the numbers of public rights of way.	The policy addresses the protection and enhancement of existing public rights of way. There is a similar policy in the current local plan (DM23).	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Regarding the second sentence of the policy text relating to where diversions of public rights of way may be appropriate, CPRE Avon and Bristol (492) thought that an additional consideration relating to the historic importance of the public right of way should be added.	<p>The policy is in line with national guidance: <u>Rights of way advice note 9: General guidance on public rights of way matters.</u> - GOV.UK (www.gov.uk)</p> <p>Other policies in the local plan address issues relating to the historic environment and heritage assets.</p>	No modifications suggested.

Policy T6: Active travel routes

Representations received: 3

Object: 2

Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
Natural England (489) commented that active travel routes should enhance nature recovery and green / blue infrastructure networks.	Other policies in the local plan address issues relating to nature recovery and green and blue infrastructure.	No modifications suggested.
More stringent policy wording was sought by Bristol Cycling Campaign (416), e.g. development 'must' rather than 'where possible'.	The expectations of the policy are clearly set out in the text. In national planning policy language, 'must' is reserved for matters of specific legal compliance.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Regarding the reference in para. 10.49 to Design and Access Statements and Transport Statements, Bristol Parks Forum (495) thought additional text should be provided to ensure these assessments report on the identification and consideration of the existing functions of the area and describe solutions to how those functions can be maintained or improved in the area.	Paragraph 10.49 specifically relates to how these documents address the matters set out in Policy T6.	No modifications suggested.

Community facilities

Policy CF1: Provision of community facilities

Representations received: 22

Object: 21

Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
The policy's expectation that major developments likely to generate a need for new or extended community facilities will be	The requirement for community facilities would be assessed according to the scale, use and location of the development.	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
<p>expected to provide a minimum of 10% of ground floor space for use by a community group was objected to for the following reasons:</p> <ul style="list-style-type: none"> • Lack of clarity on: <ul style="list-style-type: none"> • how the need for new or extended community facilities generated by the development would be assessed (representation by Dandara Living Developments Ltd (430), Sovereign Network Group (461), Watkin Jones (437), AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (472)); 		
<ul style="list-style-type: none"> • how the policy relates to the use of Community Infrastructure Levy (representation by Watkin Jones (437) and Sovereign Network Group (461)) and Section 106 contributions (representation by 	<p>The policy refers specifically to community facilities. CIL is paid in accordance with the relevant regulations.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Sovereign Network Group (461)), i.e. there are mechanisms already in place to secure community infrastructure or mitigate impacts so no new policy should be needed;</p>		
<ul style="list-style-type: none"> • how the 10% measurement would be made, e.g. gross or net floorspace (representation by Watkin Jones (437)); 	<p>The policy refers to ground floor space so net would be appropriate, subject to flexible and reasonable consideration according to the development proposed.</p>	<p>No modifications suggested</p>
<ul style="list-style-type: none"> • what is affordable rent (representation by Watkin Jones (437)); 	<p>A similar approach is used in the council's approved City Centre Development and Delivery Plan.</p>	<p>No modifications suggested</p>
<ul style="list-style-type: none"> • whether viability cases can be made for non-compliance with the policy (representation by Watkin Jones (437)); • Failure of the policy text to reflect scheme viability considerations (representation by AEW UK Investment Management (458) and Science Creates (445), who 	<p>Issues of viability would be a material consideration.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
suggested additional text to address this)		
<ul style="list-style-type: none"> potential mechanisms to secure affordable floorspace, e.g. the council leasing floorspace at market rates then subleasing this floorspace at a discounted rate (representation by Sovereign Network Group (461), AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (472)). 	A similar approach is used in the council's approved City Centre Development and Delivery Plan.	No modifications suggested
<ul style="list-style-type: none"> Lack of practicality: <ul style="list-style-type: none"> for many mixed-use schemes 10% of ground floor space would not create useable space (representation by Watkin Jones (437)) 	Matters of scale would be a material consideration.	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> There are competing interests for ground floor space within mixed use development, e.g. secure cycle storage, plant space for mechanical and energy infrastructure, etc (representation by Abrdn Plc (440), Bristol Alliance Limited Partnership (442), Sovereign Network Group (461), AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (472)) 	<p>The policy requires that 10% of ground floor space is given to community facilities. All other ground floor areas are available for other aspects of the development.</p>	<p>No modifications suggested</p>
<ul style="list-style-type: none"> Lack of evidence: <ul style="list-style-type: none"> to justify the provision of 10% of ground floor space and affordable rent (representation by Abrdn Plc (440), Bristol Alliance Limited Partnership (442), Gloucestershire County Cricket Club (447), Sovereign Network Group (461), AEW UK Real Estate Investment 	<p>A similar approach is used in the council's approved City Centre Development and Delivery Plan.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (472))</p> <ul style="list-style-type: none"> • on the need for new community facilities (representation by Watkin Jones (437)) • assessing impacts on scheme viability (representation by Watkin Jones (437)). 		
<ul style="list-style-type: none"> • Failure of policy text to include reference to provision of ground floor space only where interest / market exists (representation by AEW UK Investment Management (458)) • Failure of policy text to include a clawback mechanism for floorspace allocated for community use to be released for alternative uses if there is no interest in the space (representation by AEW UK Investment Management (458)) 	<p>The policy states that only major developments that would generate the need for new or extended community facilities will be expected to provide the 10%.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Lack of flexibility, e.g. policy should allow financial contributions to off-site provision or enhancement to existing facilities (representation by Orangestar Capital (Globe Bristol) Ltd (441)). 	<p>The purpose of the policy is to secure community facilities in the relevant development.</p>	<p>No modifications suggested</p>
<p>Additional policy text was sought by NHS Bristol, North Somerset & South Gloucestershire Integrated Care Board (468) to permit the NHS to utilise new community facilities when necessary to deliver NHS community services.</p>	<p>NHS services would constitute community facilities in accordance with this policy.</p>	<p>No modifications suggested</p>
<p>Dandara Living Developments Ltd (430) considered there was an inconsistency between the policy's expectation that new community facilities should be located within existing centres and the Development Strategy's policies which seek community facilities within the growth and regeneration areas.</p>	<p>Where possible, community facilities should be located in centres but need for community facilities is not restricted to these areas.</p>	<p>No modifications suggested</p>
<p>A lack of clarity on how the need for new community facilities would be assessed was raised by a Hotwells and Cliftonwood</p>	<p>The approach to community facilities in Western Harbour is addressed in Policy DS4.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
Community Association (261), who sought a new community services hub located at the B Bond Warehouse building.		

Policy CF2: Retention of community facilities

Representations received: 6 Object: 6 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
<p>The uses covered by this policy were considered too broad by Sovereign Network Group (461), Gloucestershire County Cricket Club (447), Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (474) and in their objections:</p> <ul style="list-style-type: none"> Amending the policy to make clear that community uses are those falling within Use Class F2 of the Use Classes Order was advocated by Sovereign Network Group (461), Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (474). 	The term community facilities is addressed in 11.1.	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • Sovereign Network Group (461) also thought the policy should be amended to make clear that any uses that it seeks to protect that fall outside of Use Class F2 should be limited to Use Class F1 uses. • Gloucestershire County Cricket Club (447) considered that community facilities were more akin to uses that are managed, occupied or used primarily by the voluntary and community sector for community-led activities. They sought greater differentiation in the policy regarding private / commercial enterprises that provide community benefits. 		
<p>Specific policy provisions which ensured healthcare facilities proposed for disposal would not be required to retain any part of the site for alternative community use were sought by NHS Property Services Ltd (375) and NHS Bristol, North Somerset, and South Gloucestershire Integrated Care Board (468).</p>	<p>The policy aims to avoid the loss of community facilities or land unless certain provisions are demonstrated. The same policy approach is found in the current local plan, Policy DM5.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
The failure of the policy to express clear support for development that would ensure the retention, improvement and extension of existing community facilities was objected to by the Parochial Church Council of St Mary Redcliffe (399).	This policy deals specifically with the retention of community facilities, Policy CF1, deals with the provision of community facilities.	No modifications suggested
Regarding the reference in para. 11.14 to the council considering the need for appropriate replacement facilities in line with community needs, Bristol Parks Forum (495) thought text should be added to ensure those facilities were co-designed with the community.	There would be engagement with the community through consultation during the planning application process.	No modifications suggested

Net zero and climate

Chapter-wide issues

Main issues raised	Council's comments	Suggested modifications / actions
Written Ministerial Statement on Local Energy Efficiency Standards:	The WMS of the 13 December 2023 is not considered to affect the content of policies NZC1, NZC3 or NZC4 as it	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> A number of representors from the development industry noted the impact of the 13 December 2023 Written Ministerial Statement and felt policies NZC 1-4 should be either removed or amended accordingly. 	<p>addresses energy efficiency measures standards. See NZC2 below.</p>	
<p>Representors identified a number of concerns with the policies as a whole:</p> <ul style="list-style-type: none"> Interaction between planning policy and building regulations: <ul style="list-style-type: none"> The planning system should not set out requirements that would be met through building regulations and instead should focus on ensuring development is sustainably located according to AEW Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management, Taylor Wimpey (478), Sovereign Network Group 	<p>The policies are in conformity with national policy and for local authorities to be able to set standards which go beyond building regulations.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
(461) and Elizabeth Blackwell Properties (189).		
<ul style="list-style-type: none"> Overly onerous and likely to affect scheme deliverability was the view of Esteban Investments Ltd (420), Legal and General (409), Yara Capital (426), Fusion Group, (396), Argo Real Estate Management Ltd (491) and Orangestar Capital (441). 	The policies in this section are considered appropriate and viability tested.	No modifications suggested.
<ul style="list-style-type: none"> Too prescriptive and duplicating national policy was the concern of AEW UK Investment Management (458). 	The policies are sufficiently flexible and in line with national policy.	No modifications suggested.
<ul style="list-style-type: none"> A lack of evidence to support targets or offset rates was raised by Hoare Lea (400). 	The policies are considered to be proportionately evidenced.	No modifications suggested.
<ul style="list-style-type: none"> Future Homes Standard: <ul style="list-style-type: none"> As the introduction of Future Homes Standard is scheduled for 2030, the need for local plan targets was questioned by AEW Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o 	The policies are considered appropriate and consistent with national planning policy.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<p>LaSalle Investment Management, Taylor Wimpey (478), Sovereign Network Group (461) and Elizabeth Blackwell Properties (189).</p>		
<ul style="list-style-type: none"> • Need for viability testing: <ul style="list-style-type: none"> • Due to forthcoming changes to building regulations and the Future Homes Standard, any alternative policy approaches should be subject to robust viability testing according to Gloucestershire County Cricket Club (447). 	<p>The policies are informed by viability considerations.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • Lack of clarity on application requirements: <ul style="list-style-type: none"> • As the policies require significant additional application stage information to be submitted, clear guidance on these information requirements was sought by Bristol Temple Quarter Delivery Team (296). 	<p>The policies are considered sufficiently detailed to be implemented effectively. Further guidance will be prepared to support applicants with their submission requirements. The current practice note is an example of such support.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> There was a failure to address emissions caused by commuting according to David Gray (303). 	<p>Transportation issues are addressed by other policies in the local plan.</p>	<p>No modifications suggested.</p>

Policy NZC1: Climate change, sustainable design and construction

Representations received: 26 Object: 20 Support: 6

Main issues raised	Council's comments	Suggested modifications / actions
<p>'Mitigating and adapting to climate change' section of policy text:</p> <ul style="list-style-type: none"> The Home Builders Federation (414) regarded this part of the policy text as only referencing other policies in the chapter so thought it should be deleted as superfluous. 	<p>The policy is intended to frame the wider chapter and the wording is considered appropriate.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> St Mowden Logistics (379) thought that use of 'minimising' and 'maximising' set open-ended requirements which could have unintended consequences on the viability of development. They favoured 	<p>The wording of the policy is appropriate and clear.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
replacing 'minimising' with 'reducing' and 'maximising' with 'provision'.		
<ul style="list-style-type: none"> • Regarding the reference to sustainability statements, mention should be made of IEMA guidance to ensure sustainability statements consider all potential climate impacts according to Hoare Lee (400). 	The policy wording is considered to have appropriate levels of detail. Further guidance will be published to assist applicants in meeting the sustainability statement requirements of this policy.	No modifications suggested.
<p>Sustainable Design Standards' section of policy text:</p> <ul style="list-style-type: none"> • BREEAM 'Excellent' rating requirement: <ul style="list-style-type: none"> • More flexibility in the policy wording was sought by St Mowden Logistics (379) and Clifton College (419) to recognise where site constraints mean it is not possible to achieve the requirement. Science Creates (445) also identified concerns over impacts on scheme deliverability in the deep-tech and wider Research and Development sector. 	The policy is considered flexible and able to take account of specific circumstances.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> The delivery of the requirement was also questioned by St Mowden Logistics (379) given that BREEAM version 7 was due to be released in 2024 and the extent of updates were currently unknown. 	<p>The policy makes appropriate reference to BREEAM.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> BREEAM Communities 'Excellent' rating requirement: <ul style="list-style-type: none"> Regarded as onerous by Dandara Living Developments Ltd (430), who sought more flexibility. 	<p>The BREEAM requirement is appropriate to ensure development outcomes which meet the objectives of the local plan.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Amending the policy wording to make clear that, for developments of more than 200 dwellings which seek certification under the Home Quality Mark, they should be excluded from the BREEAM Communities requirement, was advocated by Hoare Lee (400). 	<p>The policy does not remove the requirement for a BREEAM communities assessment for development of more than 200 dwellings which seek certification under the Home Quality Mark.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> BREEAM Communities was considered to be an outdated and impractical framework and reference should be removed according to Bellway Strategic Land (464). 	<p>The BREEAM requirement is appropriate to ensure development outcomes which meet the objectives of the local plan.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Lack of clarity on the term 'mixed use' was of concern to Dandara Living Developments Ltd (430). 	<p>The term mixed use is widely understood and used in national planning policy.</p>	<p>No modifications suggested.</p>
<p>'Water Efficiency' section of policy text and its proposed water efficiency standard:</p> <ul style="list-style-type: none"> Welcomed by Bristol Water (417). Insufficiently ambitious according to the Environment Agency (465). Objected to by the Home Builders Federation (414). They felt developers are frequently building to this standard and any updates to building regulations may render it obsolete. 	<p>The water efficiency standard proposed is considered appropriate and consistent with national policy.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Reference to Sustainable Design Standards in explanatory text (paras. 12.1.8 - 12.1.11):</p> <ul style="list-style-type: none"> Avon and Somerset Police (59) sought inclusion of reference to the Secured by Design initiative. 	<p>Security as a design concern is better addressed through other policies and design guidance.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> The reference in para. 12.1.8 to BREEAM methods being used 'unless replaced by another standard which is approved by the local planning authority' was objected to Clifton College (419). They thought it should be included within the policy text. 	<p>The sentence is not required. The sentence can be removed for clarity.</p>	<p>Suggested additional modification:</p> <p>Policy NZC1, para 12.1.8, final sentence</p> <p>Remove final sentence of para 12.1.8: The BREEAM methods should be used where required by policy, unless replaced by another standard which is approved by the local planning authority.</p>
<p>CPRE Avon and Bristol (492) thought that the level of development proposed in the plan is incompatible with mitigating its associated contribution towards the drivers of climate change.</p>	<p>The level of development proposed throughout the plan as an appropriate response to development needs having regard to the policies in the National Planning Policy Framework.</p>	<p>No modifications suggested.</p>

Policy NZC2: Net zero carbon development – operational carbon

Representations received: 38

Object: 30

Support: 8

Main issues raised	Council’s comments	Suggested modifications / actions
<p>Written Ministerial Statement on Local Energy Efficiency Standards:</p> <ul style="list-style-type: none"> • A number of representors highlighted the 13 December 2023 Written Ministerial Statement: <ul style="list-style-type: none"> • Relying on building regulations to manage energy efficiency in new buildings rather than local plan policy was the approach advocated by the Home Builders Federation (414). • ClientEarth (230) noted that the Written Ministerial Statement does not preclude local authorities setting energy efficiency standards which go beyond building regulations. • Scheme viability could be affected by the policy's proposed standards according to Abri (163), Anchor 	<p>It is suggested that the metric used by the policy can be modified to reflect the Written Ministerial Statement.</p>	<p>Suggested main modifications: <i>Energy use <u>efficiency</u> in new development</i></p> <p>Development will be expected to:</p> <ul style="list-style-type: none"> • Calculate and report predicted energy use intensity using an energy performance model; • Be highly energy efficient, minimising the demand for heating, cooling, hot water, auxiliary energy, lighting and unregulated energy consumption through

Main issues raised	Council's comments	Suggested modifications / actions
<p>(346) and St Mowden Logistics (379). They thought the policy should be thoroughly viability- and feasibility-tested if retained.</p> <ul style="list-style-type: none"> • Hoare Lee (400) thought that, in line with the Town and Country Planning Association's response to the Written Ministerial Statement, if the council wishes to pursue its current approach, it will need to be thoroughly evidenced. 		<p>energy efficiency measures; then</p> <ul style="list-style-type: none"> • <u>Minimise demand through energy efficiency measures, then</u> • Meet its remaining heating and/or cooling demand sustainably as set out below; then • Maximise on-site renewable energy generation to achieve a net zero energy balance; and then • <u>Meet the specific standards below and offset any outstanding regulated CO₂ emissions. Meet any outstanding reduction</u>

Main issues raised	Council's comments	Suggested modifications / actions
		<p>in residual energy use through energy offsetting.</p> <p>New development should demonstrate through an energy strategy set out as part of its Sustainability Statement how these requirements will be met, including the specific standards set out below.</p> <p><i>Specific standards for development</i></p> <p>Development will be expected to:</p> <ul style="list-style-type: none"> • <u>For homes, achieve a 100% reduction in regulated CO₂ emissions from the Target Emission Rate calculated using the in-force version of SAP,</u>

Main issues raised	Council's comments	Suggested modifications / actions
		<p><u>Home Energy Model or future replacement.</u></p> <ul style="list-style-type: none"> • <u>For non-residential development, achieve a 100% reduction in regulated CO₂ emissions from the Target Emission Rate calculated using National Calculation Methodology compliant software or future replacement.</u> • For major non-residential development, achieve the mandatory operational energy and carbon requirements of BREEAM 'Excellent' consistent with policy NZC1.

Main issues raised	Council's comments	Suggested modifications / actions
		<ul style="list-style-type: none"> ● Achieve a maximum 15-20 kWh/m²/yr space heating demand; ● Achieve the following standards: <ul style="list-style-type: none"> ○ In the case of new homes and other forms of accommodation, a maximum energy use intensity of 35kWh/m²/yr; ○ In the case of major non-residential development, the operational energy/carbon requirements of BREEAM 'Excellent'

Main issues raised	Council's comments	Suggested modifications / actions
		<p>consistent with policy NZC1; and</p> <ul style="list-style-type: none"> • Provide on-site renewable electricity generation with an output equivalent to at least the annual energy consumption of the development, as calculated using an energy performance model. <p><u>Where it is clearly demonstrated that onsite emissions reduction has been maximised and it is not technically feasible for the development to achieve a 100% reduction on the Target Emissions rate onsite, the remaining regulated CO₂ emissions should be offset as set out below.</u></p>

Main issues raised	Council's comments	Suggested modifications / actions
		<p>Where it is clearly demonstrated that it is not technically feasible for the development to generate sufficient on-site renewable energy equivalent to at least its own annual energy consumption, the Development should maximise on-site renewable energy to generate at least 105 kWh/m²fp/yr – where m²fp is the area of the footprint of the building(s). <u>Where it is clearly demonstrated that this is not technically feasible, the applicant should offset the remaining generating capacity needs of the development should be met by offsetting measures as set out below.</u></p> <p>Energy Carbon offsetting</p> <p>Where the above requirements for energy use <u>CO₂ emission</u></p>

Main issues raised	Council's comments	Suggested modifications / actions
		<p><u>reduction</u> cannot be met by on-site measures alone, any remaining <u>CO₂ emissions</u> will be met by either:</p> <ul style="list-style-type: none"> • A financial contribution towards the council's energy offset fund; or • Securing the provision of acceptable directly linked or near-site new additional renewable electricity generation provision. <p>The financial contribution required will be a one-off payment equivalent to the cost of <u>mitigating the remaining CO₂ emissions off-site over a 30 year period</u>. The value of a <u>tonne of CO₂e</u> is tied to the <u>high scenario in the valuation of Energy Use and Greenhouse Gas supplementary guidance to</u></p>

Main issues raised	Council's comments	Suggested modifications / actions
		<p><u>the treasury's Green Book (currently £403).</u></p> <p><u>Where development does not meet the minimum onsite renewable energy requirement, a one off-payment equivalent to the cost of providing equivalent additional small scale solar PV energy generation elsewhere in the city over a 30 year period, index linked. This cost is tied to the most recent DESNZ solar PV cost data for small scale solar PV, and includes a 15% administrative charge (currently £99 per MWh).</u></p> <p><i>Development involving existing buildings</i></p> <p>Where work is being carried out to existing buildings and it is not feasible for the full residential and non-residential</p>

Main issues raised	Council's comments	Suggested modifications / actions
		<p>targets above to be met, the energy strategy should show that <u>CO₂ emissions have</u> has been reduced to the lowest practical level using energy efficiency measures, heating and cooling systems have been selected in accordance with the heating and cooling hierarchy and that on-site renewable energy generation will be maximised.</p> <p><i>PassivHaus buildings</i></p> <p>An alternative route to compliance is through the certified PassivHaus Classic or higher standard. Where development is proposed to be built and certified to this standard, the specific policy requirements above relating to <u>CO₂ emissions, on-site renewables, and energy carbon offsetting</u> <u>and minimising the</u></p>

Main issues raised	Council's comments	Suggested modifications / actions
		<p><u>performance gap</u> will not need to be met.</p> <p>Where this route to policy compliance is pursued, a full energy strategy will not be required. It will be sufficient to submit the technical information required to demonstrate that the PassivHaus standard can be achieved and for the Sustainability Statement to demonstrate that residual heating/cooling demand for the development has been met sustainably as set out below.</p> <p><i>System flexibility</i></p> <p>Development should demonstrate how it has incorporated smart and flexible technologies to support the wider decarbonisation of the energy system, taking account of the latest best practice and</p>

Main issues raised	Council's comments	Suggested modifications / actions
		<p>guidance. Measures may include, among others:</p> <ul style="list-style-type: none"> • Minimising energy demand at peak times; • Smart controls; • Allocating space for internal and/or external thermal and electrical energy storage; and • Provision for vehicle-to-grid charging. <p><i>Heating and Cooling Systems</i></p> <p>Development will be expected to demonstrate through its energy strategy that sustainable heating and cooling systems have been selected in accordance with the following hierarchy:</p> <ul style="list-style-type: none"> • Where possible, connection to an existing classified heat

Main issues raised	Council's comments	Suggested modifications / actions
		<p>network or a new classified heat network from the point of occupation;</p> <ul style="list-style-type: none"> • Elsewhere, employing communal or individual renewable heating system which is fossil fuel free. <p>Major development in an area where a classified heat network is planned but connection from the point of occupation cannot be provided will be expected to incorporate, where feasible, infrastructure for future connection to the district heat network.</p> <p>The creation of new heat networks should be considered in the case of proposals that would provide more than 100</p>

Main issues raised	Council's comments	Suggested modifications / actions
		<p>homes or 10,000m² floorspace within or adjacent to areas of growth and regeneration identified in the development strategy or other areas of significant development. In these cases, a feasibility study should be undertaken to establish whether a new heat network could be established, and if found to be feasible a heat network should be provided as part of the development proposals.</p> <p>Development should seek to eliminate the need for cooling systems throughout the life-cycle of the development and, where cooling systems are required, minimise their capacity and energy consumption in accordance with the following hierarchy:</p>

Main issues raised	Council's comments	Suggested modifications / actions
		<ul style="list-style-type: none"> • Minimise the amount of heat entering buildings during warmer months through orientation, form, shading, surface finish, glazing design and insulation; then • Minimise internal heat generation through energy efficient design and specification; then • Maximise the use of passive ventilation to manage internal temperatures; and then • Having minimised the need for cooling, meet any residual requirement through energy efficient mechanical ventilation

Main issues raised	Council's comments	Suggested modifications / actions
		<p>and active cooling systems.</p> <p>Delivering modelled performance <u>Minimising the performance gap</u></p> <p>Proposed <u>Major</u> development will be expected to minimise the potential performance gap between design aspiration and completed development by implementing a recognised quality regime from design through to handover.</p> <p><u>Major development should calculate and report predicted energy use using an energy performance model.</u></p> <p><i>(and any further consequential amendments to the introduction and explanation sections)</i></p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>'Specific standards for development' section of policy text:</p> <ul style="list-style-type: none"> • Mark Letcher (244) and Max Fordham LLP (387) thought the approach for using space heating targets and energy use intensity targets should apply to all buildings, including non-residential buildings. • The Centre for Sustainable Energy (413) sought specific targets for non-major commercial development. • Space heating demand requirement (first bullet point): <ul style="list-style-type: none"> • This was too vague according to Mark Letcher who feared the 20kwh/m2/year target will be defaulted to. • Energy use intensity standard (second bullet point): <ul style="list-style-type: none"> • The 35kwh/m2/year requirement was regarded as unreasonably onerous by Conygar Bristol Ltd 	<p>See above in relation to the written ministerial statement.</p>	<p>Modify the policy as noted.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>(403) and Central Fishponds Ltd (405), who thought it should be expressed as a range of 35-55kwh/m2/year.</p> <ul style="list-style-type: none"> • Live West (245) were concerned that the maximum energy use intensity target will make it more difficult to deliver low density housing types. They felt it would instead favour higher concentrations of apartments which are less adaptable to meet occupiers changing needs. • Unite Group Plc (457) considered that, if the 35kWh/m2/year requirement includes both regulated and unregulated loads, it will be very difficult to achieve. • The Centre for Sustainable Energy (413) supported the use of an energy use intensity metric as they considered it a more robust, clear and quantifiable means of 		

Main issues raised	Council's comments	Suggested modifications / actions
<p>assessing both energy efficiency and its associated offset.</p> <ul style="list-style-type: none"> • Max Fordham LLP (387) thought that energy use intensity should also apply to refurbishment and reuse of existing buildings as these will form a considerable portion of development. • St Mowden Logistics (379) thought that any energy use target in the policy which is based on third party guidance, such as BREEAM, should reference the relevant version on which feasibility and viability assessments have been based. Therefore, BREEAM 6 should be specified. • On-site renewable electricity generation requirement (third bullet point): <ul style="list-style-type: none"> • This could place additional cost burdens on development according to LiveWest (245). 		

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Central Fishponds Ltd (405) thought the requirement would not be achievable for higher density schemes. Whilst offsetting is available, they did not consider it prudent to propose a requirement that will not be achievable. 		
<p>'Energy offsetting' section of policy text:</p> <ul style="list-style-type: none"> Amendment to allow housing associations to demonstrate an investment in the decarbonisation of their housing stock as a way of meeting the policy's offset requirements was sought by Live West (245) and South West Housing Association Planning Consortium (439). St Mowden Logistics (379) and Central Fishponds Ltd (405) thought that the requirement for energy offsetting is not consistent with the Written Ministerial Statement (13/12/2023) as they refer to energy and should be expressed in terms of carbon. 	<p>The approach to energy offsetting (now proposed to be carbon offsetting) is appropriate and amendments are suggested to reflect the use of percentage uplift on TER.</p>	<p>Suggested main modification: NZC2, 'Energy offsetting' section of policy text, p.159 Energy <u>Carbon offsetting</u> Where the above requirements for <u>energy use-CO₂ emission reduction</u> cannot be met by on-site measures alone, any remaining <u>CO₂ emissions</u> will be met by either:</p> <ul style="list-style-type: none"> A financial contribution towards the council's energy offset fund; or

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Regarding the reference in the second paragraph to the financial contribution being in a one-off payment, specifying Section 106 agreements as the primary means for managing offsite contributions was advocated by Clifton College (419). Further details of the contributions expected for offsetting requirements and the demonstration of viability were sought by Dandara Living Developments Ltd (430). 		<ul style="list-style-type: none"> Securing the provision of acceptable directly linked or near-site new additional renewable electricity generation provision. <p>The financial contribution required will be a one-off payment equivalent to the cost of <u>mitigating the remaining CO₂ emissions off-site over a 30 year period. The value of a tonne of CO_{2e} is tied to the high scenario in the valuation of Energy Use and Greenhouse Gas supplementary guidance to the treasury's Green Book (currently £403).</u></p> <p><u>Where development does not meet the minimum onsite renewable energy requirement, a one off-payment equivalent to the cost of providing equivalent</u></p>

Main issues raised	Council's comments	Suggested modifications / actions
		additional small scale solar PV energy generation elsewhere in the city over a 30 year period, index linked. This cost is tied to the most recent DESNZ solar PV cost data for small scale solar PV, and includes a 15% administrative charge (currently £99 per MWh).
<p>'Heating and Cooling Systems' section of policy text:</p> <ul style="list-style-type: none"> Deleting the text explaining the cooling hierarchy (fourth paragraph and accompanying bullet points) and inserting it into Policy NZC4 was advocated by Mark Letcher (244). 	Including the cooling hierarchy in policy NZ2 is appropriate.	No modifications suggested.
<ul style="list-style-type: none"> Regarding the reference to proposals for more than 100 homes or 10,000m² floorspace to consider the creation of new heat networks, Central Fishponds Ltd (405) and Dandara Living Developments Ltd (430) thought this should be led by 	This is intended to encourage developers to select the most sustainable heating system for development of this scale.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Bristol City Leap or the council rather than developers.		
<ul style="list-style-type: none"> Dandara Living Developments Ltd (430) objected to the requirement for development to connect to existing or new heat network where the system does not currently exist. 	The provision to connect to existing or new heat networks is appropriate and consistent with national planning and climate policy.	No modifications suggested.
<ul style="list-style-type: none"> Dandara Living Developments (430) Ltd raised concern at the requirement that individual or communal heating systems will not be permitted to use fossil fuels, whereas developments which connect to heat networks will have no such requirement. They thought connections to heat networks should only be required where the network is fossil fuel free. 	The provisions for heating systems that are not connected to heat networks to be fossil fuel free are appropriate having regard to local plan objectives and national policy.	No modifications suggested.
Bellway Strategic Land (464) thought that the specific standards in the policy needed to be justified and evidence-based, as well as viability tested.	The policies have been informed by viability considerations.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<p>The focus should be on regulated rather than unregulated emissions / demand according to Live West (245), Hoare Lee (400) and St Mowden Logistics (329). The latter representor thought it was unreasonable for developers of non-residential schemes to be responsible for the emissions of the occupant.</p>	<p>Modifications have been suggested to address the written material statement as set out above.</p>	<p>No modifications suggested.</p>
<p>Anchor (346) highlighted the 14 March 2015 Written Ministerial Statement which precluded the ability of local authorities to set energy efficiency standards that go beyond building regulations. Consequently they considered policies NZC2, NZC3 and NZC4 should not be included in the local plan.</p>	<p>The WMS 13 December 2023 indicates that local authorities can set energy efficiency standards that go beyond building regulations provided they are evidenced, justified and expressed in terms of percentage uplift over TER.</p>	<p>No modifications suggested.</p>
<p>The perceived failure of the policy to require a Passivhaus standard (or equivalent) as minimum was of concern to Sara Grimes (203) and ClientEarth (230).</p>	<p>Passivhaus is identified as an alternative route to compliance with the policy.</p>	<p>No modifications suggested.</p>
<p>Requirements and energy models proposed should be applied flexibly when considering the retrofit of heritage assets according to Clifton College (419). They recommended a</p>	<p>The policy's provisions can be implemented having regard to the specific aspects of development proposals.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
reference be made to the plan's heritage policies to strengthen this.		
Amending the policy to preclude the installation of solid fuel heating, in particular wood-burning stoves, was advocated by ElhPlan (404).	Solid fuel heating would not be accepted under the policies heat hierarchy. The installation of wood-burning stoves in existing dwellings is not an issue covered by planning in most instances.	No modifications suggested.
Support for the policy was received from Vattenfall Heat UK (294), in particular its support for the expansion of the city's heat network.	Support noted.	No modifications suggested.
Considering whether offsetting funds could be used to promote the decarbonisation of the healthcare system was requested by NHS Property Services Ltd (375).	This would not be an issue for the local plan to address directly.	No modifications suggested.

Policy NZC3: Embodied carbon, materials and circular economy

Representations received: 25 Object: 24 Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
<p>'Embodied carbon - major applications' section of policy text:</p> <ul style="list-style-type: none"> Central Fishponds Ltd (405) thought the policy's targets would have an undue impact on construction costs and therefore the viability of development. 	<p>The policy's requirements are appropriate and reflect viability considerations.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Concern over the targets and offsetting costs was expressed by St Modwen Logistics (379) and Conygar Bristol Ltd (403), arguing that the targets proposed go beyond current good practice. 	<p>The policy's requirements are appropriate and reflect viability considerations.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Evidence demonstrating how the targets have been determined was sought by the South West Housing Association Planning Consortium (439). 	<p>The policy's requirements are appropriate and reflect viability considerations.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Insufficient justification for using the government's Green Book's higher cost scenario for offsetting was of concern to St Modwen Logistics (379). 	<p>The government's higher cost scenario is considered appropriate for the policy.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> The standard for taller buildings (5 storeys or greater) was not appropriate according to Bristol Civic Society (285) as they thought it would encourage a less sustainable building form. 	<p>The higher threshold for taller buildings is appropriate given the need to balance benefits associated with higher density development, and issues relating to their typology such as fire safety which may affect achievement of a lower threshold to be.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Including a mechanism for the periodic review of the embodied carbon targets was sought by Mark Letcher (244). He felt they were likely to become out of date as industry adapts to the initial targets. 	<p>The policy's embodied carbon targets are considered appropriate.</p>	<p>No modifications necessary.</p>
<p>Due to the absence of an assessment of the predicted emissions resulting from the plan's strategy, Bristol Civic Society (285) questioned whether the plan is consistent with the Climate Change Act 2008, the Sixth Carbon Budget and their implications when read in conjunction with the NPPF. They felt the targets in the policy should be more ambitious so as to ensure net zero is actually achieved. The Centre for Sustainable Energy (413) endorsed the Civic Society's comments.</p>	<p>The plan is considered to be legally compliant with the climate Change Act 2008, the Sixth Carbon Budget and the NPPF.</p>	<p>No modifications necessary.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Regarding the requirement to carry out embodied carbon assessments, the Home Builders Federation (414) thought it will be necessary to consider the implications for the preparation of any assessment, particularly in relation to the availability of any data required and that responsibility for many emissions will lie in areas outside of the control of developers (e.g. material extraction, transportation, etc). They advocated a transitional period to allow industry and supply chain to adjust to the requirements.</p>	<p>The approach to embodied carbon assessments is considered reasonable and practicable.</p>	<p>No modifications suggested</p>
<p>Anchor (346) highlighted the 14 March 2015 Written Ministerial Statement which precluded the ability of local authorities to set energy efficiency standards that go beyond building regulations. Consequently they considered policies NZC2, NZC3 and NZC4 should not be included in the local plan.</p>	<p>The WMS 13 December 2023 indicates that local authorities can set energy efficiency standards that go beyond building regulations provided they are evidenced, justified and expressed in terms of percentage uplift over TER.</p>	<p>No modifications suggested</p>
<p>The creation of a draft climate adaptation strategy to be prepared to assist applicants and officers in implementing the policy was</p>	<p>This is not an issue for the local plan to consider.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
suggested by the South West Housing Association Planning Consortium (439).		
Use of the words 'minimising' and 'maximising' throughout the policy was of concern to St Modwen Logistics (379). They thought this makes the policy requirements too open-ended which could impact on the feasibility and viability of development.	The language used to specify the requirements of the policy is appropriate.	No modifications suggested

Policy NZC4: Adaptation to a changing climate

Representations received: 18

Object: 17

Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
Wessex Water (112) thought that greater focus needed to be given to rainwater management and collection, as well as sewer flooding and storm overflows.	The provisions of the policy are considered to be sufficient in scope to address such matters.	No modifications suggested
A number of representors thought the policy does not provide sufficient detail as to how its requirements should be met. The Home Builders Federation (414), for example,	The policy is considered sufficiently detailed and clear.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
highlighted that it does not set out criteria as to what level of mitigation and management of climate risk would be deemed acceptable.		
Mark Letcher (244) thought that it will be difficult for smaller developments to demonstrate compliance with the policy, and proposed a more streamlined approach.	The approach for mitigating risks associated with climate change is appropriate.	No modifications suggested.
Natural England (489) and CPRE Avon and Bristol (492) recommended strengthening the policy's wording, such as changing 'should' to 'must'.	The suggested language is not appropriate.	No modifications suggested.
Anchor (346) highlighted the 14 March 2015 Written Ministerial Statement which precluded the ability of local authorities to set energy efficiency standards that go beyond building regulations. Consequently they considered policies NZC2, NZC3 and NZC4 should not be included in the local plan.	The WMS 13 December 2023 indicates that local authorities can set energy efficiency standards that go beyond building regulations provided they are evidenced and justified.	No modifications suggested.
Within the policy's 'General principles' section and its third bullet point, Bristol Parks Forum (495) sought the inclusion of 'health and well-	Health and wellbeing is addressed through other local plan policies.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
being' as a benefit alongside climate adaption and biodiversity.		

Policy NZC5: Renewable energy and energy efficiency

Representations received: 7 Object: 5 Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
Natural England (489) highlighted the need for evidence to demonstrate the appropriateness of new renewable energy capacity and energy storage in the Avonmouth Industrial and Bristol Port area given the location's ecological importance.	The area was identified as being appropriate for new large scale wind turbines in the existing local plan. The sustainability appraisal and habitats regulations assessment consider ecological matters regarding renewable energy development.	No modifications suggested.
CPRE Avon and Bristol (492) thought that solar energy generation that does not require building on greenfield land should be prioritised, such as roof top solar or over car parks.	The policy supports proposals for renewable energy across the city, both on green and brownfield land.	No modifications suggested.
The Home Builders Federation (414) observed that heat networks are often powered by non-renewable sources. They thought that it may	The approach towards heat networks is considered appropriate and consistent with policy objectives.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
be more sustainable for some development to utilise other forms of energy provision.		
The Home Builders Federation (414) and LiveWest (245) considered that there is the potential for lower customer satisfaction when using a heat network, as energy prices can often be high and they are unable to switch suppliers due to the nature of the fixed infrastructure connection.	The approach towards heat networks is considered appropriate and consistent with policy objectives.	No modifications suggested.

Managing flood risk

Policy FR1: Flood risk and water management

Representations received: 7

Object: 5

Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
A number of detailed wording amendments were considered necessary by the Environment Agency (465) to ensure the policy and its explanatory text better accorded with national planning policy.	The policy is considered consistent with national planning policy and will provide an appropriate vehicle for considering flood risk and development.	Additional modifications may be appropriate if these would assist shared understanding of the policy.

Main issues raised	Council's comments	Suggested modifications / actions
<p>Adding reference in the policy wording to 'multifunctional' Sustainable Drainage Systems was requested by Natural England (489), who also advocated mention of other nature-based solutions to water management such as trees and green / blue roofs.</p>	<p>Reference could be added as an additional modification.</p>	<p>Additional modifications to include reference to sustainable SUDs could be added.</p>
<p>Reference to managing water stress or drought was sought by Natural England (489). They thought the policy could refer to approaches such as using rainwater harvesting in new development.</p>	<p>The wording of the policy is considered consistent with national planning policy.</p>	<p>No modifications suggested.</p>
<p>Concerns were raised about references to the sequential test in para. 12.2.6:</p> <ul style="list-style-type: none"> • The Environment Agency (465) considered the paragraph unclear as it seemed to indicate that no sequential test would likely be regarded by the council as having failed given the statement that there is sufficient capacity for housing development within Flood Zone 1. 	<p>The flood risk topic paper addresses these matters. It is considered that the paragraph correctly reflects the relationship of the plan to national planning policy.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Dandara Living Developments Ltd (430) considered there was an inconsistency between the text which stated that the development of sites in undefended Flood Zone 3 areas was not needed and the Bristol Urban Potential Assessment 2020-2040 which they felt made clear that sites outside Flood Zone 1 would be needed. 	<p>The policy is consistent with national planning policy. A flood risk topic paper explains the approach to the tests in national planning policy.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Dandara Living Developments Ltd (430) felt that, by stating that the sequential test had been met, this contradicted the Development Strategy's Policies DS1-DS14 which required sequential tests to be undertaken. 	<p>The policy approach is consistent with national planning policy.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Dominic Hogg (448) doubted that the sequential test had been meaningfully applied. 	<p>A flood risk topic paper sets out the approach to the sequential test which has been correctly applied.</p>	<p>No modifications suggested.</p>
<p>Support for the policy was received from Wessex Water (112).</p>	<p>Support is noted.</p>	<p>No modifications suggested.</p>

Policy FR2: Bristol Avon Flood Strategy

Representations received: 12

Object: 10

Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
<p>The policy's approach to securing financial contributions to future flood defences and an enhanced multi-purpose greenway (third bullet point of policy text) raised the following issues:</p> <ul style="list-style-type: none"> Detail on the calculations / requirements for the contributions was sought by Watkin Jones (437) and Smart Urban Living Bristol (one) Ltd (451); 	<p>The policy is considered to be effective by containing an appropriate level of detail.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Concern that the approach did not meet tests in national planning policy for seeking planning obligations was expressed by Sovereign Network Group (461) and Smart Urban Living Bristol (one) Ltd (451): <ul style="list-style-type: none"> they felt that seeking potentially open-ended contributions to a capital project did not meet the test that obligations should relate to the scale and kind of the development proposed. 	<p>The policy is considered appropriate and consistent with national planning policy.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> they considered that if development in advance of the flood strategy was required to provide flood risk mitigation to enable the site to be safe for the lifetime of the scheme, then requiring financial contributions to strategic flood defences would not meet the test relating to obligations being necessary to make the scheme acceptable as that test would have been met through flood risk mitigation provision. 		
<p>The need to revisit the third paragraph of the policy text was advocated by Sovereign Network Group (461). This related to the expectation that development adjacent to the Flood Defence Policy Areas shown on the Policies Map would be expected to accommodate space for flood protection infrastructure. They felt that this reduced the value of showing these areas on the Policies</p>	<p>The policy is considered appropriate and consistent with national planning policy. It is appropriate to refer to land adjacent to the policy area because development might abut this.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Map as land around them would also be subject to this policy.		
The fourth paragraph of the policy text was of concern to Structadene (455). This states that development proposals would not be permitted if they prejudice the implementation of the Bristol Avon Flood Strategy. They thought clarity was needed on the requirements and implementation of the strategy, e.g. it would be necessary to understand what the strategic flood solution looks like so that development proposals can be designed and located appropriately.	It is appropriate that the policy expects development should not prejudice the implementation of the flood risk strategy. The policy is proportionate and appropriate.	No modifications suggested.
<p>Regarding the Flood Defence Policy Areas shown on the Policies Map:</p> <ul style="list-style-type: none"> The Environment Agency (465) considered their alignment needed to be expanded slightly, especially around Netham, to incorporate the options for alignment in the Bristol Avon Flood Strategy's Outline Business Case. 	The area identified reflects the information about defences set out in the flood risk strategy.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • Sovereign Network Group (461) thought they were inconsistent with the evidence base so that additional areas were shown on the Policies Map without apparent justification. 	<p>The policy and Policies Map refers to the appropriate area.</p>	<p>No modifications suggested.</p>
<p>The Environment Agency (465) sought detailed wording changes to the policy:</p> <ul style="list-style-type: none"> • Within the policy text's second bullet point add 'with' between 'overtopped' and 'on-site flood defence works'. • Within the policy text's third paragraph and the sentence ending '...deliver flood protection infrastructure required as part of the development of the area including an enhanced greenway', replace 'including' with 'and'. • Add 'and river flows to increase' at the end of the sentence in para. 12.2.10 ending '...climate change causing sea levels to rise, storms to increase in frequency and severity'. 		<p>Additional modifications may be appropriate to reflect the matters raised.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • Replace 'design' with 'designed' in the second sentence of para. 12.2.11 and add references to improvements to biodiversity / nature. • The Agency thought the last two sentences of para. 12.2.12 could be removed on the grounds that they were already relying on the defences which were being referred to. 		
<p>Natural England (489) sought changes to the policy to make it clear that:</p> <ul style="list-style-type: none"> • all development on the River Avon will be expected to contribute to the creation of a multi-purpose greenway along the river; • opportunities for green infrastructure that deliver flood mitigation benefits will be supported in line with the emerging Bristol Avon Flood Strategy, in line with explanatory text in para. 9.1.43 to Policy BG5 'Biodiversity and access to Bristol's waterways'. 	<p>The policy related to the area identified on the Policies Map.</p> <p>The matters referred to are addressed in other policies.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Given the importance of the Bristol Avon Flood Strategy's implementation in enabling the council to meet its strategic development needs, Cubex Land Limited (453) felt that the policy could provide more positive weight to schemes which deliver a greenway and flood defences, particularly as this could require a significant loss of land available on the site for development purposes.</p>	<p>This approach is not considered relevant to the policy and to the holistic implementation of the strategy.</p>	<p>No modifications suggested.</p>
<p>The Bristol Avon Flood Strategy was considered by Hotwells and Cliftonwood Community Association (261) to be ineffective, misrepresenting current flood risk and proposing inappropriate flood defence measures.</p>	<p>The details of the flood risk strategy are subject of separate consultation and approval processes. The local plan deals with the interface of the strategy with the development plan.</p>	<p>No modifications suggested.</p>
<p>John Knight (126) considered that Government Regulations allow other projects such as with the Environment Agency to benefit from Community Infrastructure Levy payments. He felt it important that this should be set out in the explanatory text at para. 12.2.13.</p>	<p>These references are not considered necessary to the operation of the policy.</p>	<p>No modifications suggested.</p>

Design and Conservation

Chapter-wide issues

Main issues raised	Council's comments	Suggested modifications / actions
<p>Historic England (476) raised concern that the chapter did not provide a positive strategy for the historic environment as required by national planning policy. They felt it was not supported by an up-to-date evidence base, referring to 'Our Inherited City - Bristol Heritage Framework (2015-2018)' published in 2015. They recommended the production of a Heritage Topic Paper and a commitment to update 'Our Inherited City' to address this concern.</p>	<p>The plan to provides a positive strategy for the historic environment in accordance with national planning policy. The plan includes policies which directly address heritage and conservation issues. Additionally, the development strategy and site allocations include specific references to heritage assets and issues in their given areas.</p>	<p>No modifications suggested.</p>
<p>Bristol Civic Society (285) considered there had been a failure to develop effective design policies with local communities which reflected their aspirations.</p>	<p>The proposed design policies build on the existing approach to design in the current local plan. As stated, the council will prepare local design guides and code which will involve community engagement.</p>	<p>No modifications suggested.</p>

Policy DPM1: Delivering well-designed, inclusive places

Representations received: 25

Object: 20

Support: 5

Main issues raised	Council's comments	Suggested modifications / actions
<p>The policy was considered too restrictive by Anchor (346). They thought flexibility was needed to allow development in those circumstances where some harm might occur but which nevertheless would deliver other important planning objectives, e.g. optimising densities.</p>	<p>Policy DMP1 is sufficiently flexible and is consistent with national planning policy.</p>	<p>No modifications suggested.</p>
<p>'The ten characteristics of well-designed places' section in policy text:</p> <ul style="list-style-type: none"> • additional text clarifying that these should be taken into account only where practicable and feasible depending on individual site circumstances was sought by Argo Real Estate Management Ltd (491), Fusion Group (396), Yara Capital (426) and Orangestar Capital (Globe Bristol) Ltd (441). 	<p>The Ten Characteristics of Well-Designed Places are established in the National Design Guide and National Model Design Code as being prerequisites to positive design outcomes. Their inclusion in the plan and the future design guide as integral and consistent with national planning policy.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • according to Sovereign Network Group (461), contrary to para. 13.1.8, the characteristics did not reflect the National Design Code and so should be reordered with the criteria under each characteristic 	<p>The policy correctly reflects the ten characteristics.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>removed or aligned with the Code. regarding the 'Nature' sub-section, to strengthen the policy CPRE Avon and Bristol (492) advised adding 'protect' ahead of 'retain and integrate'.</p>		
<ul style="list-style-type: none"> in relation to the 'Built form - a coherent pattern of development' sub-section, the Environment Agency (465) advised that in areas of undefended flood zone 3 or 2, active frontages will need to be safe from flooding, demonstrated through a site-specific flood risk assessment. 	<p>Flood matters are addressed in other policies.</p>	<p>No modifications suggested.</p>
<p>'Mixed-use development' section:</p> <ul style="list-style-type: none"> Was too prescriptive according to Clifton College (419). They sought additional text which supported the approach of providing a mix of uses in an overall area. Additional text was needed to make clear that major development should provide a mix of uses only 'if appropriate' according to Dandara Living Developments Ltd (430) 	<p>References to mixed used development are consistent with national planning policy. The policy wording is sufficiently flexible.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>'Local character and distinctiveness' section:</p> <ul style="list-style-type: none"> • A brdn Plc (440) and Bristol Alliance Limited Partnership (442) sought additional text to require new development to respond to emerging, as well as local, context. This was to ensure new development has suitable regard to development objectives for an area which may point to opportunities for proposals to define their own setting. 	<p>The policy sets out an appropriate requirement for development to respond to its local context and allows for new types of design, scale and form.</p>	<p>No modifications suggested.</p>
<p>'Co-ordinated development' section:</p> <ul style="list-style-type: none"> • more flexibility was sought by Argo Real Estate Management Ltd (491), AEW UK Real Estate Investment Trust, CBRE Investment Management and Taylor Wimpey (479), Sovereign Network Group (461), Yara Capital (426), Clifton College (419) and Orangestar Capital (Globe Bristol) Ltd (441), e.g. additional text to allow deliverable sites to come forward if there are complex land ownership issues or after consideration had been given to 	<p>The policy approach is flexible. The policy wording is intended to promote co-ordinated and coherent development across multiple sites where appropriate.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
the potential for co-ordinated development.		
<p>'Design guides and codes' section:</p> <ul style="list-style-type: none"> Reliance on design codes, masterplans and spatial frameworks which have not been published nor have clear timescales for production was objected to by Clifton College (419). They considered it rendered the policy undeliverable. 	The policy builds on existing design policy and existing national level design guidance in the form of the National Model Design Code and the National Design Guide. The council's design code will reflect these documents at a local level.	No modifications suggested.
<ul style="list-style-type: none"> Additional text to ensure proposals are consistent with design guides and codes published by community stakeholders or others, as well as the council, was sought by WeCanMake (446). 	The policy wording is considered to be sufficient.	No modifications suggested.
Concern that the policy contained too many elements was raised by LiveWest (245). They advised splitting its various sections into separate policies, e.g. Urban Living, Public Art, etc.	The policy approach is considered clear.	No modifications suggested.
Criticisms that the policy wording lacked clarity were made by representors:	The policy wording is reflective of language used in the National Model Design Code and National Design Guide.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • Use of 'beautiful' and 'healthy' should be removed according to Clifton College (419) as they were subjective. • Dominic Hogg (448) thought the policy looked like 'an afterthought'. 		
<p>A lack of reference to the role of Design Review and the council's Conservation Advisory Panel was raised as a concern by Historic England (476).</p>	<p>These are well established elements within the design of development process rather than being policy specific matters. Details are available on the council's website: Apply for a Design Review (bristol.gov.uk)</p>	<p>No modifications suggested.</p>
<p>Adoption of the Healthy Streets approach as a formal assessment of street design and transport schemes was sought by Bristol Business Improvement Districts (423).</p>	<p>The policy reflects national design policy which itself references healthy development.</p>	<p>No modifications suggested.</p>
<p>Encouraging development to be designed in line with its Active Design guide and principles was advocated by Sport England (485).</p>	<p>Comments noted.</p>	<p>No modifications suggested.</p>

Policy DC1: Liveability in residential development including space standards, aspect and private outdoor space

Representations received: 15

Object: 9

Support: 6

Main issues raised	Council's comments	Suggested modifications / actions
<p>Support for the policy was received from Argo Real Estate Management Ltd (491), Orangestar Capital (Globe Bristol) Ltd (441), Fusion Group (396), AEW UK Investment Management (458), Gloucestershire County Cricket Club (447), LiveWest (245) and Yara Capital (426).</p>	<p>Support for the policy is noted.</p>	<p>No modifications suggested.</p>
<p>Concern that the policy was not in accordance with the 'Achieving appropriate densities' section of the National Planning Policy Framework (December 2023) was raised by Sovereign Network Group (461), AEW UK Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (478).</p>	<p>The policy is reflective of the NPPF.</p>	<p>No modifications suggested.</p>
<p>References to the Urban Living Supplementary Planning Document (SPD):</p> <ul style="list-style-type: none"> • removal of references to the SPD was sought by the Home Builders Federation (414), Sovereign Network Group (461), AEW UK Real Estate Investment Trust, 	<p>The references to the Urban Living SPD are appropriate and that the policy is clear in explaining its role.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (478). They considered it was dated, inconsistent with national planning policy, not tested for its impact on development viability and not subject to independent examination. They also considered it underpinned requirements in the policy and thought this inappropriate.</p> <ul style="list-style-type: none"> • a lack of clarity in the relationship between the policy and the SPD was the view of Kenneth MacArthur (5). He thought the SPD contained only recommendations whereas the policy indicated that development proposals should be required to follow the SPD. 		
<p>'Internal space standards' section of policy text:</p> <ul style="list-style-type: none"> • Objection to the need for development to comply with the Government's nationally described space standard was made by the Home Builders Federation (414), Taylor 	<p>The government's nationally described space standards are appropriate for development in Bristol and have been used for some time.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Wimpey, AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (478). This was on the grounds that it had not been justified, as required by national planning policy.</p>		
<p>'Aspect' section:</p> <ul style="list-style-type: none"> • Sovereign Network Group (461), Taylor Wimpey, AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (478) sensed an inconsistency in the way the policy sought to 'maximise' dual aspect and 'avoid' single aspect homes, with the former providing flexibility and the latter being too restrictive. They favoured instead text which only required development to optimise dual aspect homes. • Was too restrictive regarding single aspect homes according to Abrdn Plc (440) and 	<p>The approach towards prioritising dual aspect dwellings is considered appropriate. The development management process will enable an appropriate response to issues such as site specific constraints.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Bristol Alliance Limited Partnership (442). They suggested text which set out the circumstances where these dwellings would be supported. Similarly, Dandara Living Developments Ltd (430) felt it was too negative, arguing that single aspect homes do not necessarily result in poor quality accommodation.</p>		
<p>'Private outdoor space' section:</p> <ul style="list-style-type: none"> • Abrdn Plc (440) and Bristol Alliance Limited Partnership (442) considered that text should be added to clearly specify that, in addition to gardens and balconies, roof terraces are a suitable means by which private amenity and play space outdoor can be provided. 	<p>The provisions for private outdoor space are considered appropriate reasonable.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> • inappropriately required provision of play space irrespective of site or location circumstances / context according to Sovereign Network Group (461). Echoing this concern, Taylor Wimpey, AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle 	<p>The policy's provisions are appropriate and justified.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Investment Management and CBRE Investment Management (478) thought there was a lack of evidence to justify this part of the policy.		
<ul style="list-style-type: none"> The recognition in the policy that there are often other planning issues that restrict the incorporation of balconies on flats, such as overlooking, was urged by McCarthy Stone (300). 	The policy allows for flexibility in its application.	No modification suggested.

Policy DC2: Tall buildings

Representations received: 27 Object: 19 Support: 8

Main issues raised	Council's comments	Suggested modifications / actions
Historic England (476) raised concern at the absence of an evidence study which could have informed the policy and its vision / strategy for the appropriate location of tall buildings.	The policy indicates (as specified) that tall buildings may be appropriate in locations for the most intensive forms of development and is criteria based, allowing for consideration of the range of tall building impacts. The criteria based approach allows for evidence and considerations such as conservation area character appraisal to be taken into account when considering	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
	impacts. The criteria specifically refer to the setting of heritage assets.	
<p>Whether a suitably plan-led approach had been taken was questioned by Historic England (476). Referring to the policy text which states that proposals should be consistent with the Urban Living Supplementary Planning Document (SPD), they pointed out that the SPD only refers to recommendations for individual proposals. They were concerned about the potential cumulative effects of individual proposals on the coherence of the cityscape without an overall vision / strategy for tall buildings.</p>	<p>The policy refers to consideration of the individual and cumulative contribution of tall buildings with other existing and proposed tall buildings.</p>	<p>No modifications suggested.</p>
<p>Opposition to the policy was received from Bristol Civic Society (285) (whose comments were supported by Bristol Conservation Advisory Panel (340), George Ferguson (415) and Knowle Neighbourhood Planning Group (372)), Kingsdown Conservation Group, Shankari Raj (3) and Kevin Chidgey (345). Concerns about tall buildings included:</p>	<p>The policy states that tall buildings may be appropriate where they would contribute positively. It sets out criteria for the impact of tall buildings to be considered and which also address liveability. Matters of carbon emissions are addressed through the policies for net zero and climate.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • potential impacts on the city's skyline, city centre / harbourside character and heritage assets such as the setting of conservation areas and listed buildings. • creation of inadequate living environments; • a perceived lack of public support; • high carbon emissions relative to lower buildings; • their inappropriateness given the city's topography. <p>Rather than tall buildings Bristol Civic Society (285) favoured encouraging mid-rise, high-density developments in the city centre. If tall buildings were to be promoted, Kevin Chidgey (345) felt they should be located only in low lying areas away from the city's historic core.</p>		
<p>References in the policy text to locations where tall buildings may be appropriate:</p> <ul style="list-style-type: none"> • These were objected to by Sovereign Network Group (461), AEW UK Real Estate 	<p>The policy indicates that tall buildings (30 metres/10 storeys) may be appropriate in an identified area of central Bristol (inner urban area, etc.) and other locations where specified, where they would make a positive contribution and subject to the criteria in the policies –</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (472). They felt there was a lack of evidence to justify the locations and considered that identifying locations was contrary to the concept of optimising density based on site and location specific considerations.</p>	<p>and where they are consistent with other relevant policies.</p>	
<ul style="list-style-type: none"> • Bristol Civic Society (285) were concerned about the lack of clarity on locations and acceptable heights of tall buildings. Frank Bruce and Company Limited (493) also sought clarity on locations, suggesting the Lawrence Hill growth and regeneration area could be specified. 	<p>The approach to location, requirement for positive contribution and the range of appropriate assessment criteria are considered a suitable policy context for consideration of tall buildings.</p>	<p>No modifications suggested.</p>
<p>Reference to the Urban Living Supplementary Planning Document (SPD):</p> <ul style="list-style-type: none"> • removal of reference to the SPD was sought by the Sovereign Network Group (461), AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and 	<p>The SPD is considered up to date and relevant. It has a section on tall buildings and it is appropriate that it is referenced in the policy.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>CBRE Investment Management (472). They considered it was dated, inconsistent with national planning policy, not tested for its impact on development viability and not subject to independent examination. They also considered it underpinned requirements in the policy and thought this inappropriate.</p>		
<p>Concerns that the policy was too restrictive were raised by Conygar Bristol Ltd (403) and Central Fishponds Ltd (405). Rather than stating that 'tall buildings should not have a harmful impact...', they favoured wording to the effect that the design of tall buildings should minimise and where possible avoid a harmful impact.</p>	<p>The policy is considered to have criteria which are appropriate to the consideration of proposals which have the potential to have significant impacts.</p>	<p>No modifications suggested.</p>
<p>Clarity on the reference in the policy text to 'unduly dominating impacts on adjoining buildings' was sought by Dandara Living Developments Ltd (430) who felt it was too subjective.</p>	<p>These are appropriate considerations in the assessment of the impact of tall buildings.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
Regarding the section of the policy which provides criteria for assessing harmful impact, Bristol Parks Forum (495) felt this should be strengthened to ensure the extent of the assessment area on local surroundings is made clear. They sought specific reference to a 'harmful impact on features in the locality of the development'.	The policy addresses the potential for harmful impacts to ensure they do not occur.	No modifications suggested.
A cap on the height of buildings was sought by Visit West - Local Visitor Economy Partnership (306) over concerns about impacts on cityscape.	The policy is criteria based and allows for consideration of the range of tall building impacts. A cap would not be consistent with this approach and would restrict flexibility.	No modifications suggested.
Greater detail with targets for implementation and a review process was sought by Bristol Conservation Advisory Panel (340).	The policy is sufficiently detailed and will be supported by guidance/codes. The local plan is subject to future review.	No modifications suggested.
Regarding the policy's reference to tall buildings being over 30 metres / 10 storeys, Fishponds Community Planning Group (190) were of the view that, in an area such as Fishponds where two-storey buildings predominate, buildings above approx. 21	Other design policies would address the appropriate scale of development in this location.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
metres / 7 storeys would be considered tall and out of scale.		
Dominic Hogg (448) considered the policy to be vague yet permissive.	The policy is criteria based and allows for consideration of the range of tall building impacts.	No modifications suggested.
Support for the policy was received from ABRDN Plc (440), Argo Real Estate Management Ltd (491), Fusion Group (396), Orangestar Capital (Globe Bristol) Ltd (441), Bristol Alliance Limited Partnership (442), Gloucestershire County Cricket Club (447), Cubex Land Limited (453), AEW UK Investment Management (458) and Yara Capital (426).	Support noted.	No additional actions.

Policy DC3: Alterations to existing buildings

Representations received: 4

Object: 2

Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
Concerns that most of the policy's requirements were overly onerous were raised by CBRE Investment Management	The policy builds on existing local plan policy and considers its requirements to be reasonable.	No modification suggested.

Main issues raised	Council's comments	Suggested modifications / actions
(471), who sought their removal and suggested alternative text.		
Greater detail with targets for the implementation and review of this policy were sought by Bristol Conservation Advisory Panel (340).	The policy builds on existing local plan policy and its requirements have contain appropriate detail. Further guidance will be provided in the forthcoming Bristol Design Guide.	No modification suggested.
A lack of reference in the policy alerting developers to the need for Listed Building Consent was of concern to Bristol Conservation Advisory Panel (340).	The local plan does not provide guidance on the range of consent requirements.	No modification suggested.

Policy DC4: Recycling and refuse provision in new development

Representations received: 2 Object: 1 Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
The policy was not compliant with meeting Government targets to recycle waste and reduce residual waste according to Dominic Hogg (448).	The policy supports adequate provision of domestic waste storage. It reflects national policy and supports the established waste and recycling regime in the city.	No modifications suggested.
Support was received from LiveWest (245).	Support noted.	No modifications suggested.

Heritage and the historic environment

Policy CHE1: Conservation and the historic environment

Representations received: 21 Object: 16 Support: 5

Main issues raised	Council's comments	Suggested modifications / actions
<p>Concern that the policy did not accord with national planning policy regarding the weighing of a proposal's public benefits against any potential harm to heritage assets was raised by Conygar Bristol Ltd (403), University of the West of England (408), Legal and General (409), Dandara Living Developments Ltd (430), Watkin Jones (437), Abrdn Plc (440), Bristol Alliance Limited Partnership (442), Sovereign Network Group (461), AEW Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management (472), Royal London Asset Management (494) and the Parochial Church Council of St Mary Redcliffe (399).</p>	<p>The policy supports the conservation and enhancement of the city's heritage. The council considers it in line with national planning policy and its ambition to respond sensitively to heritage assets.</p>	<p>No modifications suggested.</p>
<p>Criteria in the policy 'Conserving heritage assets' section was considered too restrictive by Legal & General, Dandara Living</p>	<p>The criteria within the policy are considered appropriate and flexible.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<p>Developments Ltd (430), Watkin Jones (437), Royal London Asset Management (494) and the Parochial Church Council of St Mary Redcliffe (399). This related to the requirement that all criteria should be met. It was felt this would be impractical because, should the significance of an asset beyond the control of the applicant be harmed as a result of a change in 'setting', it was unclear how a scheme would meet the policy's first two criterion.</p>		
<p>Regarding the policy's 'Energy efficiency retrofit, sustainable heating and renewable energy systems' section and its reference to proposals not adversely affecting the character and appearance of the heritage asset, Bristol Parks Forum (495) thought that mention should also be made of the asset's setting.</p>	<p>Matters of setting would be taken into account in accordance with this and other policies.</p>	<p>No modifications suggested.</p>
<p>The policy should be strengthened by including specific criteria for safeguarding historic assets, including buffer zones, height limitations and design standards for</p>	<p>The policy has an appropriate level of detail. Further guidance will be provided in the forthcoming Bristol Design Guide.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
development within conservation areas according to Bristol Conservation Advisory Panel (340). Similarly, more stringent wording so that the emphasis would be on 'requiring' rather than 'expecting' was advocated by Bristol Parks Forum (495).		
Regarding the reference in para. 13.2.9 to the need for planning applications to be supported by heritage statements, Bristol Conservation Advisory Panel (340) sought additional reference to method statements as they felt these can provide details of proposed materials and techniques to inform decision making.	The text relates specifically to heritage statements which will show how the proposal addresses the policy.	No modifications suggested
A lack of reference in the policy alerting developers to the need for Listed Building Consent was of concern to Bristol Conservation Advisory Panel (340).	The policies are not intended as alerts for regulatory requirements.	No modifications suggested
Setting out within the policy a commitment and timeframe for revising Conservation Area character appraisals was sought by Bristol Conservation Advisory Panel (340).	This is not a matter for the local plan and will be considered elsewhere.	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
Including within the policy the management of changes in the setting of a conservation area was sought by John Knight (126).	The policy sets out an appropriate strategy for managing changes to the setting of conservation areas.	No modifications suggested
Removal from the Policies Map of the proposed Local Historic Park and Garden designation for St Matthias Park was requested by Old Market Community Association (233). They considered it was already shown as an open space in the Old Market Quarter Neighbourhood Plan under its Policy E3.	This is a designation in the current local plan and indicates a heritage asset of city-wide importance. Its inclusion on the map alongside the OMQNP designation is appropriate.	No modifications suggested.

Policy AD1: Advertisements

Representations received: 19 Object: 3 Support: 16

Main issues raised	Council's comments	Suggested modifications / actions
Objection was made by Wildstone Capital Limited (438). They considered the policy too negatively worded, disproportionate, inflexible, inconsistent with national planning policy, lacking adequate evidence and failing	The policy is in accordance with national planning policy. Advertisements will be considered have regard to amenity impacts or public and/or road safety as set out elsewhere.	No modifications suggested

Main issues raised	Council's comments	Suggested modifications / actions
to consider reasonable alternatives and market signals. Revisions to the policy were advocated.		
Additional provisions which addressed wildlife impacts and the avoidance of obstructions to cycle lanes and footpaths were sought by Windmill Hill and Malago Planning Group (174) and Bristol Business Improvement Districts (423), respectively.	In accordance with national planning policy, the policy can only considered potential amenity or public/road safety impacts. Cycle lanes and footpaths would be included under the latter consideration.	No modifications suggested
Support was received from Adblock Bristol (326), Bristol Conservation Advisory Panel (340) and fourteen members of the public.	Support noted.	No modifications suggested

Health, wellbeing and food sustainability

Policy HW1: Pollution Control and Water Quality

Representations received: 3

Object: 2

Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
Wording which expects development to reduce diffuse water pollution through filtration and interception, including through using Sustainable Drainage Systems or other nature-based solutions, was requested by Natural England (489).	The policy makes reference to measures to control run-off and other diffuse pollution.	No modifications suggested.
In addition to the policy's reference to development affecting water bodies covered by the Water Framework Directive, Natural England (489) thought that impacts of water quality on protected sites and species such as Atlantic salmon, European eel, sea lamprey and brown trout should be considered, with evidence of these species being found in sites across central Bristol and surrounding waterways.	The approach to nature conservation is addressed by other policies in the local plan.	No modifications suggested.
Regarding the policy text's first sentence and its reference to unacceptable impacts, Bristol Parks Forum (495) sought the addition of green / blue infrastructure to those impacts which should be considered.	The local plan contains other policies which address the maintenance, protection and enhancement of existing green/blue infrastructure.	No modifications suggested.

Policy HW2: Air Quality

Representations received: 5

Object: 4

Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
<p>Concerns about the policy's lack of clarity were raised by Sovereign Network Group (461), AEW UK Real Estate Investment Trust and Taylor Wimpey (347). This was in connection with the policy's references to:</p> <ul style="list-style-type: none">• 'development with the potential to generate significant numbers of additional journeys'. It was felt that 'significant numbers' should be defined, while 'journeys' should refer only to those made by non-active or non-sustainable transport modes; and• 'significant local emissions'. A definition of this term supported by appropriate evidence was sought.	<p>The wording of the policy is considered appropriate.</p>	<p>No modifications suggested.</p>
<p>Additional policy wording to reduce car commuting was advocated by David Gray (303), while John Knight (126) thought the</p>	<p>The local plan contains other policies which promote sustainable transport over private car use.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
relevant legal limits for air quality should be set out.		

Policy HW1A: Noise

Representations received: 3

Object: 3

Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Concern that the policy did not address construction phase noise impacts was raised by Dominic Hogg (448) and Natural England (489).	Where construction noise would cause a significant impact, appropriate mitigation would be secured through planning conditions.	No modifications suggested.
Natural England (489) were also concerned about the supporting text's reference to planning conditions being used to require relevant assessments of noise. This was in connection with 'Habitats sites', i.e. those sites of international importance defined in Conservation of Habitats and Species Regulations 2017. They sought text to clarify that, for development where noise could likely affect these sites, rather than being secured by condition, a noise assessment and	Planning conditions are considered to be an appropriate means through which to secure effective noise mitigation when required.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
mitigation scheme (if necessary) would be required prior to determination of an application in order to inform the Habitats Regulations Assessment.		
Making acoustic and noise monitoring mandatory at peak operating times when plans are submitted near 24 hour economy venues and sites was advocated by NightWatch (368), who also thought that deed of easement areas should be set up around these sites.	The agent of change principle addresses negative impacts arising from new development on 24 hour economy venues.	No modifications suggested.

Policy HW1B: Contaminated land

No representations received.

Health impacts of development

Policy HW2B: Health and development

Representations received: 9

Object: 4

Support: 5

Main issues raised	Council's comments	Suggested modifications / actions
<p>Natural England (489) considered the policy should be expanded to identify links between health and access to nature and green space. They thought it should require development to provide high quality designed green space / infrastructure in order to reduce the causes of ill health, improve health and reduce health inequalities.</p>	<p>The multi-functional benefits, including on health and wellbeing, of access to nature and green space are identified in other policies within the local plan.</p>	<p>No modifications suggested</p>
<p>Objection to the policy's requirement for health impact assessments was made by Sovereign Network Group (461), Taylor Wimpey and AEW UK Real Estate Investment Trust (483) as they considered it unnecessarily burdensome on developers.</p>	<p>Health impact assessments for development of a certain scale is an extant requirement in the current local plan. Mitigate potential negative health impacts associated with new development, is consistent with the objectives of national planning policy.</p>	<p>No modifications suggested</p>
<p>Requiring health impact assessments to consider impacts on the health of commuters to the proposed development was requested by David Gray (303).</p>	<p>The approach to health impact assessments is considered comprehensive.</p>	<p>No modifications suggested</p>
<p>Sport England (485) made reference to their 'Active Design' guidance.</p>	<p>Further reference to additional guidance, including Sports England's Active Design guidance may be appropriate in the forthcoming Bristol Design Guide.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
Support was received from University Hospitals Bristol and Weston NHS Foundation Trust (250), NHS Bristol, North Somerset & South Gloucestershire Integrated Care Board (468), NHS Property Services Ltd (375) and Fishponds Community Planning Group (190).	Support noted.	No modifications suggested

Policy HW3: Takeaways

Representations received: 1

Object: 1

Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Objection was made by McDonalds Restaurants Ltd (334), who considered the policy's provisions were inconsistent with national planning policy, discriminatory, disproportionate, ineffective, overly restrictive, negatively worded and insufficiently justified.	The policy builds upon existing local plan policy and is consistent with national policy.	No modifications suggested

Food sustainability

Policy FS1: The provision of allotments

Representations received: 23

Object: 6

Support: 17

Main issues raised	Council's comments	Suggested modifications / actions
<p>The policy was opposed by AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management, Taylor Wimpey (482) and Sovereign Network Group (461) who cited the following reasons:</p> <ul style="list-style-type: none"> • On-site provision approach: <ul style="list-style-type: none"> • This was considered inappropriate given developments of 60-plus dwellings would likely be high-density urban schemes where it would be impractical to deliver plots on-site. • It was viewed as contrary to local and national policy requirements to make the most effective use of land. 	<p>The policy expands on an existing requirement of the current local plan. The requirements of the policy are in line with national policy and sufficiently flexible to account for a range of development typologies through the inclusion of an off-site provisioning option.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> • Brownfield sites in Bristol will often have land contamination issues which could preclude food growing. • Off-site provision or financial contributions to improvements: <ul style="list-style-type: none"> • This provision was considered to not meet tests in national planning policy for seeking planning obligations. 		
<p>A lack of evidence to justify the policy and a failure to test its impact on scheme viability was cited by Anchor (346) in its objection.</p>	<p>There is a need for allotment space to serve a growing population.</p>	<p>No modifications suggested</p>
<p>Further detail on the amount of financial contributions to be sought from development was requested by Dandara Living Developments Ltd (430).</p>	<p>The policy sets out the overall approach to allotment provision in Bristol. There is a similar policy in the currently adopted local plan.</p>	<p>No modifications suggested</p>
<p>Objection to the policy's provision which would allow off-site provision or financial contributions was made by Lynda Tanner (298).</p>	<p>Offsite provision is considered a necessary component of the policy.</p>	<p>No modifications suggested</p>

Main issues raised	Council's comments	Suggested modifications / actions
Support was received from Windmill Hill and Malago Planning Group (174), Friends of Novers Hill and Crox Bottom (Western Slopes) (155) and fourteen members of the public.	Support noted.	No modifications suggested

Policy FS2: Provision of food growing space in new developments

Representations received: 7 Object: 5 Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
<p>The policy was opposed by Sovereign Network Group (461), AEW UK Real Estate Investment Trust and Taylor Wimpey (483). Their concerns included:</p> <ul style="list-style-type: none"> Applying the policy's provisions to small residential development schemes was considered impracticable. A threshold approach was suggested as an alternative. 	<p>The policy is intended to encourage provision of food growing space in new development. The policy does not set thresholds for delivery and is intended to inform the design of green assets within development of all scales.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> The policy was viewed as too inflexible. It should allow for lower food growing space provision to reflect site constraints where necessary. 	<p>The policy does not set thresholds for food growing space in new development but is intended to inform provision of external amenity space in development of all scales.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> The policy should specify that on-site food growing space provision would be for residents of the development scheme, rather than having to also provide space to make up for any shortfall in provision elsewhere. 	<p>The policy is intended to provide on-site food growing provision associated with the new development.</p>	<p>No modifications suggested.</p>
<p>The appropriateness of the policy for sites suitable for high density development was questioned by Frank Bruce and Company Limited (493). For these sites, they felt text should be included to allow access to local food growing locations to be a relevant factor in the assessment of any application.</p>	<p>The policy aims to ensure development provides high quality and usable private outdoor amenity space in development intended for permanent or long-term habitation.</p>	<p>No modifications suggested.</p>
<p>A lack of clarity in the policy wording was of concern to Anchor (346), Dandara Living Developments Ltd (430), AEW UK Real Estate Investment Trust and Taylor Wimpey (483), e.g. 'suitable' space, 'appropriate size and quality' 'appropriately designed' and 'permanent or long-term occupation'.</p>	<p>Further guidance will be provided in the forthcoming Bristol Design Guide.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
A failure to test the policy's impact on scheme viability was cited by Anchor (346) in its objection.	The policies have been devised having regard to viability evidence.	No modifications suggested.

Policy FS3: The protection of existing food growing enterprises and allotments

Representations received: 8 Object: 7 Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
The policy was too negatively worded according to Taylor Wimpey (347) and Sovereign Network Group (461). They thought it should allow residential development on allotments where other local plan policies were met and allotment loss would be suitably mitigated.	Allotments and food growing enterprises are important aspects of land use in the city which require and appropriate and protective policy approach.	No modifications suggested.
Concern was raised about the explanatory text in paras. 14.3.28-14.3.29 which deals with impacts on local food growing enterprises and allotments and the circumstances where site operators do not wish to continue:	See above.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Manor Woods Valley Group (63) sought removal of para. 14.3.29 fearing it could pave the way for the loss of these enterprises. 		
<ul style="list-style-type: none"> Anchor (346) considered para. 14.3.29 unclear and inconsistent with para. 14.3.28 which seemed to preclude the loss of these sites. 	The policy wording sets out the intentions clearly.	No modifications suggested.

Utilities and Minerals

Policy UM1: Telecommunications

Representations received: 1

Object: 1

Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
<p>Within the first bullet point of the policy text, Bristol Parks Forum (495) thought the functions of the sites involved should also be referenced as a matter proposals for telecommunications equipment and installation should respect.</p>	<p>The role of the policy is to enable appropriate telecommunications development. Other policies would address general matters of development. There is a similar policy in the current local plan.</p>	<p>No modifications suggested.</p>

Policy UM2: Unstable Land

Representations received: 1 Object: 0 Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
Support was received from the Coal Authority (99).	Support noted.	No action required.

Policy UM3: Minerals Safeguarding Areas

Representations received: 1 Object: 0 Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
Support was received from the Coal Authority (99).	Support noted.	No action required.

Policy UM4: Sewage Treatment Works

Representations received: 1 Object: 1 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Greater ambition in the policy regarding the provision of wider sewerage improvements was advocated by the Environment Agency	The role of the policy is to safeguard land for future extension to the treatment works. Other policies would	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
(465). They felt it should explore how new development can contribute to solving current problems such as harm to watercourses from combined stormwater overflows and emergency overflows at pumping stations.	address general matters of development. There is a similar policy in the current local plan.	

Development allocations

Policy DA1: Proposed development allocations

Representations received: 35

Object: 33

Support: 2

Main issues raised	Council's comments	Suggested modifications / actions
Objection to this policy on the grounds that it allocated insufficient sites for new housing development was made by the Home Builders Federation (414). They also thought the allocations needed to consider new biodiversity net gain stipulations in relation to impacts on viability and the other requirements sought in the 'development considerations' sections of each allocation.	The local plan proposes eleven extensive areas of housing focussed regeneration, 90 site specific housing/mixed used allocation, three Green Belt releases and provides a policy context for delivering and exceeding a stated housing requirement.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Clarification on whether the proposed allocations had passed a strategic-level sequential test was sought by the Environment Agency (465).	A sequential test paper has been published. The proposed allocations are consistent with national planning policy for flood risk.	No modifications suggested.
The policy was considered unsound by Historic England (476) without evidence that an assessment had been undertaken demonstrating an appropriate consideration of the potential impacts of the proposed allocations on the historic environment / heritage assets. Similarly, a lack of detail regarding how historic assets within and adjacent to the allocation sites would be protected was raised by Bristol Conservation Advisory Panel (340).	Each site allocation addresses heritage assets where relevant and appropriate, including specific development considerations relating to heritage. The topic paper on allocations and designations explains the process for consideration of heritages matters as part of designation process. Several allocations (with BSA and SA references) have been brought forward from the current local plan.	No modifications suggested.
Specifying the opportunities for the enhancement of green infrastructure in each of the proposed allocations was requested by Bristol Urban Greening (374).	Policies in the Biodiversity and Green Infrastructure chapter are applicable to the development site allocations.	No modifications suggested.
The following sites were promoted as additional development allocations:		

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> 32-36 College House, College Green for purpose built student accommodation (representation by Empiric Student Property (459)) 	<p>The allocation of this land at this stage in local plan preparation is not considered appropriate. The proposals can be considered in the context of relevant planning policies.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> 64-68 & 78 Feeder Road, St Philip's Marsh for residential-led, mixed-use development (representation by Yara Capital (426)) 	<p>The allocation of this site is not required as the site is within the area covered by draft Policy DS3: St Philip's Marsh.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Brislington Meadows, land at Broom Hill for residential development (representation by Homes England (231)) 	<p>The allocation of this site is not required. The site is subject of a planning permission for 260 homes (Ref:22/01878/P). This is noted on the draft Policies Map. The land is part of a site of nature conservation interest.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Bristol Zoo Gardens, Clifton for residential-led development (representation by Bristol, Clifton and West of England Zoological Society (418)) 	<p>The allocation of this site is not required as a decision to grant planning permission has been taken (reference 22/02737/F).</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Broadwalk shopping centre (representation by Knowle Neighbourhood Planning Group (372)) 	<p>The allocation of this site is not required as it benefits from planning permissions (18/05184/P and 22/03924/P).</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Clifton Down Shopping Centre, Clifton Down for a residential-led mixed-uses (representation by Sovereign Network Group (461)) 	<p>The allocation of this land is not considered necessary as the proposals can be considered in the context of relevant planning policies, including those relating to the Primary Shopping Area and Whiteladies Road Town Centre designations, SSE1: Supporting Bristol's Centres – network and hierarchy and SSE2: Development in Bristol's centres. As such the site is a focus for development including new residential development which makes positive use of upper floors of properties and on underused and vacant space away from commercial frontages.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> County Ground, Bishopston for residential-led development (representation by Gloucestershire County Cricket Club (447)) 	<p>The allocation of this land at this stage in local plan preparation is not considered appropriate. Local plan designations in the submission document do not preclude development at this location. The proposals can be considered in the context of relevant planning policies.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Elm Tree Farm, Stapleton for residential-led development (representation by NHS Property Services Ltd (375)) 	<p>The allocation of this land at this stage in local plan preparation is not considered appropriate. The open space designation in the adopted Local Plan has not been carried forward in the local plan review. The proposals can be considered in the context of relevant planning policies, including those relating to the site's designation within the</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
	Stapleton and Frome Valley Conservation Area and Purdown Hospital Local Historic Parks and Gardens.	
<ul style="list-style-type: none"> Land adjacent to Woodgrove Road, Henbury for residential development (representation by Stride Brothers Ltd (21)) 	Allocation would not be consistent with proposed designation as Local Green Space. The site is also with a Site of Nature Conservations Interest and the Kingsweston and Trym Valley Conservation Area.	No modifications suggested.
<ul style="list-style-type: none"> Land adjoining Ponderosa, Bridgwater Road, Bedminster Down for residential development (representation by Chapel Hill Homes (433)) 	Allocation would not be consistent with Green Belt designation.	No modifications suggested.
<ul style="list-style-type: none"> Land at 73 Netham Road, Redfield / Barton Hill for residential development (representation by Cyril Dark and Sons Ltd (434)) 	The allocation of this land at this stage in local plan preparation is not considered appropriate. The principal industrial and warehousing area designation in the adopted Local Plan has not been carried forward in the local plan review. Local plan designations in the submission document do not preclude development. The proposals can be considered in the context of relevant planning policies.	No modifications suggested.
<ul style="list-style-type: none"> Land at 513 Stockwood Road, Brislington for residential development 	The allocation of this land is not necessary as the site is within the area covered by draft Policy DS9: Brislington.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
(representation by Industrial Gas Services SW (242))		
<ul style="list-style-type: none"> Land at Castle Court ('Bristol Street Motors site'), Arno's Vale for residential-led mixed-use development (representation by Williams Automobiles Limited (157)) 	<p>The principal industrial and warehousing area designation in the adopted Local Plan has not been carried forward in the local plan review. Local plan designations in the submission document do not preclude development. The proposals can be considered in the context of relevant planning policies, including those relating to flood risk and potential contaminated land.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Land at Castle Court ('City Motors site'), Arno's Vale for residential-led mixed-use development (representation by Sovereign Network Group (461)) 	<p>The principal industrial and warehousing area designation in the adopted Local Plan has not been carried forward in the local plan review. Local plan designations in the submission document do not preclude development. The proposals can be considered in the context of relevant planning policies, including those relating to flood risk and potential contaminated land.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Land at Golden Hill, Horfield for residential and leisure mixed-uses (representation by Bristol Grammar School (422)) 	<p>Allocation would not be consistent with playing field use and proposed designation as Reserved Open Green Space.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Land at Queens Parade /York Place, adj. Brandon Hill, city centre for residential-led mixed-uses (representation by Snap Investments Ltd (444)) 	<p>The site has been proposed for allocation for 9 residential units and therefore the site is below the threshold for new allocations in the local plan. Proposals can be considered in the context of relevant planning policies. The site is also subject to a planning application (reference 23/01942/F).</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Land at Yew Tree Farm, Bedminster Down for residential development (representation by Redrow Homes Ltd (369)) 	<p>The site is within the Green Belt which the local plan proposes to retain unchanged at this location. Adjacent land within North Somerset is within the Green Belt and it is considered that together with that land, the area identified continues to contribute to Green Belt purposes. Allocation would not be consistent with Green Belt designation. The site is a site of nature conservation interest.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Land north of the A4 Bath Road, Brislington for residential and / or older persons housing development (representation by Claverton Healthcare Ltd (206)) 	<p>Allocation would not be consistent with Green Belt designation.</p>	<p>No modifications suggested.</p>
<ul style="list-style-type: none"> Land off Tramway Road, Brislington for residential development (representation by Sovereign Network Group (461)) 	<p>There are no local plan designations in the submission document which preclude development. Proposals can be considered in the context of relevant planning policies.</p>	<p>No modifications suggested.</p>

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> Land to the South of Ironmould Lane, Brislington for residential development (representation by Barrs Court Holdings Ltd (481)) 	Allocation would not be consistent with Green Belt designation.	No modifications suggested.
<ul style="list-style-type: none"> Logos House, Wade Street, St Jude's for residential or student accommodation (representation by Salvation Army (402)) 	The allocation of this land is not necessary as the site is within the area covered by draft Policy DS5: Frome Gateway.	No modifications suggested.
<ul style="list-style-type: none"> Maggs House, 78 Queens Road, Clifton for purpose built student accommodation (representation by Schroders UK Real Estate Fund (460)) 	The allocation of this land at this stage in local plan preparation is not considered appropriate. Proposals can be considered in the context of relevant planning policies. The site is within a centre which is a focus for development including new residential development which makes positive use of upper floors of properties and on underused and vacant space away from commercial frontages.	No modifications suggested.
<ul style="list-style-type: none"> St John Ambulance site, Raleigh Road, Bedminster for residential development (representation by St John Ambulance (401)) 	The allocation of this land at this stage in local plan preparation is not considered appropriate. Local plan designations in the submission document do not preclude development. Proposals can be considered in the context of relevant planning policies.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<ul style="list-style-type: none"> South Liberty Lane / Brook Gate, Ashton Vale for mixed-use development (representation by Bailey of Bristol (129)). 	Allocation would not be consistent with the proposed designation as an Industry and Distribution Area.	No modifications suggested.
The potential loss of sites proposed for allocation which contained important green space was of concern to CPRE Avon and Bristol (492). They considered that, if the housing requirement figure was adjusted downwards, these valuable areas should be removed from the development allocations policy.	The approach to open green space is established in Local Green Space and Reserved Open Green Space - Topic Paper. The approach to site allocations is established by Development Allocations and Designations Process Topic paper. Bristol's housing need is described in the Housing need and supply topic paper (April 2024).	No modifications suggested.
Broadwalk shopping centre should be identified as a site allocation according to Knowle Neighbourhood Planning Group (372), although a land use was not specified.	The allocation of this site is not required as it benefits from planning permissions (18/05184/P and 22/03924/P).	No modifications suggested.
A failure to allocate 24-hour economy venues and sites (including festival sites) was objected to by NightWatch (368).	Evening economy matters are addressed in policy SSE3.	No modification suggested.

BDA0103 - Land at Land at Cheltenham Road / Bath Buildings, Montpelier

No representations received.

BDA0105 - Land to the rear of 64-68 Stokes Croft, St Paul's

No representations received.

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

Representations received: 2 Object: 2 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Amending the allocation boundary to match that of the related planning permission (ref. 21/03165/F) was sought by Esteban Investments Ltd (420).	The proposed site boundary is considered appropriate.	No modifications suggested.
Reference to maintaining an 8 metre buffer to Old Colliter's Brook was objected to by Esteban Investments Ltd (420) who preferred reference to a 'suitable' buffer.	The proposed development consideration is considered appropriate.	No modifications suggested.
The Environment Agency (465) considered that reference should be made to development complying with Policy FR2 'Bristol Avon Flood Strategy' where appropriate.	Policy DA1 states that sites will be developed in accordance with the accompanying development considerations and with all other relevant development plan policies.	No modifications suggested.

BDA0304 - 1-25 Bedminster Down Road

No representations received.

BDA0305 - 233-237 West Street, Bedminster

No representations received.

BDA0401 - Land at Gloucester Road /Merton Road, Horfield

No representations received.

BDA0601 Land at Latimer Close

Representations received: 1 Object: 1 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.	Policy DA1 states that sites will be developed in accordance with the accompanying development considerations, which address ecological matters, and with all other relevant development plan policies.	No modifications suggested.

BDA0702 Land at Marmalade Lane (south)

Representations received: 1 Object: 1 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.	Policy DA1 states that sites will be developed in accordance with the accompanying development considerations, which address ecological matters, and with all other relevant development plan policies.	No modifications suggested.

BDA0703 Land at Marmalade Lane (north)

No representations received.

BDA0801 - The Grove Car Park, The Grove and Prince Street, Harbourside

Representations received: 3 Object: 3 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Detailed amendments to the proposed 'Development considerations' relating to design matters were sought by Bristol Business Improvement Districts (423).	The proposed development considerations are considered appropriate. Policy DA1 states that sites will be developed in accordance with the accompanying development considerations and with all other relevant development plan policies.	No modifications suggested.
References to ensure development does not obscure the Mud Dock building's frontage were requested by Visit West - Local Visitor Economy Partnership (306) as they considered its terrace an important part of Bristol's visitor experience.	The proposed development considerations are considered appropriate and makes reference to unlisted buildings of merit, which includes the Mud Dock.	No modifications suggested.
Specific reference to development complying with Policy FR2 'Bristol Avon Flood Strategy' where appropriate was advocated by the Environment Agency (465).	Policy DA1 states that sites will be developed in accordance with the accompanying development considerations and with all other relevant development plan policies.	No modifications suggested.

BDA0801 - The Grove Car Park, The Grove and Prince Street, Harbourside

Main issues raised	Council's comments	Suggested modifications/actions
<i>Issue identified by the council.</i>	A modification to the development considerations is required to ensure the updated policy relating to Quayside Walkways is cited.	Suggested main modification: Policy DA1 BDA0801 p.53 Retain and enhance a high quality Quayside Walkway in accordance with planning policy BCAP32: Quayside walkways <u>BG5: Biodiversity and access to Bristol's waterways</u> and incorporate footway enhancements on The Grove and Prince Street;

BDA0802 - Redcliffe Way

Representations received: 2

Object: 2

Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
References to creating a high quality public realm and play facilities for residents, visitors and local office workers to enjoy was suggested by Bristol Business Improvement Districts (423).	Policy DA1 states that sites will be developed in accordance with the accompanying development considerations and with all other relevant development plan policies. Policy DPM1: Delivering well-designed, inclusive places addresses design matters.	No modifications suggested.
Specific reference to development complying with Policy FR2 'Bristol Avon Flood Strategy' where appropriate was advocated by the Environment Agency (465).	Policy DA1 states that sites will be developed in accordance with the accompanying development considerations and with all other relevant development plan policies.	No modifications suggested.

BDA0901 - 2-16 Clifton Down Road

No representations received.

BDA1001 - Land west of Hampton Lane, Clifton Down

No representations received.

BDA1002 - Land at Whiteladies Gate, Clifton Down

Representations received: 1 Object: 1 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Due to the presence of the Northern Storm Water Interceptor, the Environment Agency (465) sought reference to development being set back from the culvert where possible, along with avoidance of extra loading on the culvert.	The proposed development considerations are considered appropriate.	No modifications suggested.

BDA1003 - Land Adjacent Alma Vale Road and Alma Court

Representations received: 1 Object: 0 Support: 1

Main issues raised	Council's comments	Suggested modifications / actions
Support was received from landowner, Sovereign Network Group (461).	Support noted.	No modifications suggested.

BDA1004 - Barley House, Oakfield Grove

No representations received.

BDA1101 - Land at Gibson Road

No representations received.

BDA1102 - Land at Sydenham Lane, Cotham

No representations received.

BDA1201 - 16-20 Fishponds Road, Easton

No representations received.

BDA1301 - Stapleton Cricket Club

Representations received: 20 Object: 3 Support: 17

Main issues raised	Council's comments	Suggested modifications / actions
Support for the allocation was received from Stapleton Cricket Club (82) and 16 members of the public.	Support noted.	No modifications suggested.
Clarification was sought from Historic England (476) on how the council had considered the contribution the cricket ground makes to the character and appearance of the Stapleton and Frome Valley Conservation Area and how its redevelopment would meet the requirement of preserving or enhancing the conservation area.	The approach to site allocations is established by Development Allocations and Designations Process Topic paper. Policy DA1 states that sites will be developed in accordance with the accompanying development considerations and with all other relevant development plan policies, including Policy CHE1: Conservation and the historic environment.	No modifications suggested.
Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.	Policy DA1 states that sites will be developed in accordance with the accompanying development considerations, which addresses ecological matters, and with all other relevant development plan policies.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
Sport England (485) stated that they would be very concerned if any existing sport and recreation land and buildings would be affected by this allocation without adequate replacement prior to the loss of the existing facility.	The allocation of the land is subject to the provision of a suitable alternative playing pitch.	No modifications suggested.

BDA1302 - Land south of Rose Green Close, Eastville

Representations received: 6

Object: 6

Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Objection to this allocation was made by Christina Gyles (205), Harriet Parke (228), Mary Stevens (292) and Martyn Cordey (359) with the reasons including impacts on open space, trees, hedges, recreation, wildlife habitats and landscape and cultural value.	The allocation of the land for housing is subject to its no longer being required for sport or recreation. Policy DA1 states that sites will be developed in accordance with the accompanying development considerations and with all other relevant development plan policies including Policy BG1: Green infrastructure and biodiversity in new development, Policy BG2: Nature conservation and recovery, Policy BG3: Achieving biodiversity gains, and Policy BG4: Trees.	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
<p>Opposition on the grounds that the allocation could limit the growth of the Rose Green Centre and the football and cricket clubs that use it was made by Theron Gordon (361).</p> <p>Sport England (485) stated that they would be very concerned if any existing sport and recreation land and buildings would be affected by this allocation without adequate replacement prior to the loss of the existing facility.</p>	<p>The allocation of the land for housing is subject to its no longer being required for sport or recreation.</p>	<p>No modifications suggested.</p>

BDA1303 - Land at Hendys Yard, Lower Grove Road

No representations received.

BDA1304 - Land to the rear of Rose Green Road, Eastville

No representations received.

BDA1305 - 525 Stapleton Road, Fishponds

No representations received.

BDA1401 - Previously developed land at Hartcliffe Way, Bedminster

Representations received: 1 Object: 1 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Reference to the need for development proposals to be supported by a flood risk assessment was advised by the Environment Agency (465) as they identified the site as being in flood zone 2.	Policy DA1 states that sites will be developed in accordance with the accompanying development considerations and with all other relevant development plan policies.	No modifications suggested.

BDA1402 - Previously developed land to the west of Redford House, Nover's Hill

Representations received: 3 Object: 3 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Objection to this allocation was made by James Drozd (351) on the grounds that the existing industrial units could potentially have to be relocated to a nearby site with wildlife value.	Development should be in accordance with local plan policies including Policy BG1: Green infrastructure and biodiversity in new development, Policy BG2: Nature conservation and recovery, Policy BG3: Achieving biodiversity gains, and Policy BG4: Trees.	No modifications suggested.
More stringent wording in the allocation's 'development principles' to ensure protection of the adjoining site of nature conservation interest was sought by Tony Pitt (317).	The proposed development considerations are considered appropriate.	No modifications suggested.
Reference to the need for development proposals to be supported by a flood risk	Policy DA1 states that sites will be developed in accordance with the accompanying development	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
assessment was advised by the Environment Agency (465) as they identified the site as being in flood zone 2.	considerations and with all other relevant development plan policies.	

BDA1501 - Land at College Road, Fishponds

Representations received: 96 Object: 96 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
<p>Fishponds Community Planning Group (190) and ninety-five members of the public objected to the allocation. The reasons cited included negative impacts on open / green space important for mental health, recreation, visual amenity and nature conservation. Concerns were also raised about potential adverse effects on air quality, noise, traffic congestion, car parking and already pressurised local community services and facilities.</p>	<p>The allocation proposes self-build, custom housebuilding or community-led housing. Policy DA1 states that sites will be developed in accordance with the accompanying development considerations and with all other relevant development plan policies. This includes Policy BG1: Green infrastructure and biodiversity in new development, Policy BG3: Achieving biodiversity gains, and Policy BG4: Trees.</p> <p>The site is in a sustainable location, approximately 600m from Fishponds Town Centre and close to the bus stops on Manor Road and is not within an Air Quality Management Area. Policy IDC1: Development contributions and CIL requires development to contribute to infrastructure through the Community Infrastructure Levy.</p>	<p>No modifications suggested.</p>

BDA1601 - Land to the rear of 96 Church Road / Orchard Drive, Bishopsworth

No representations received.

BDA1702 - 14 Wyck Beck Road, Brentry

No representations received.

BDA1901 - Land at the corner of Lodge Causeway / Berkeley Road, Fishponds

No representations received.

BDA2001 - 3 Kelston Road, Horfield

No representations received.

BDA2002 - 272-276 and 290-298 Southmead Road

No representations received.

BDA2101 - 94-96 & 119 Cumberland Road, Spike Island

Representations received: 1 Object: 1 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Specific reference to development complying with Policy FR2 'Bristol Avon Flood Strategy' where appropriate was sought by the Environment Agency (465).	Policy DA1 states that sites will be developed in accordance with the accompanying development considerations and with all other relevant development plan policies.	No modifications suggested.

BDA2102 - Maritime Heritage Centre Public Car Park, Gas Ferry Road

Representations received: 5

Object: 5

Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Objection to this allocation was made by Richard Grigsby (336), Keith Pavey (93), Sylvia Heyhoe (94) and John Dalby (54) on the grounds of the potential loss of an open space valuable for local character, mature trees and wildlife.	Policy DA1 states that sites will be developed in accordance with the accompanying development considerations and with all other relevant development plan policies. The proposed development considerations address heritage and trees and are considered appropriate.	No modifications suggested.
Specific reference to development complying with Policy FR2 'Bristol Avon Flood Strategy' where appropriate was sought by the Environment Agency (465).	Policy DA1 states that sites will be developed in accordance with the accompanying development considerations and with all other relevant development plan policies.	No modifications suggested.

BDA2102 - Maritime Heritage Centre Public Car Park, Gas Ferry Road

Main issues raised	Council's comments	Suggested modifications/actions
<i>Issue identified by the council.</i>	A modification to the development considerations is required to ensure the updated policy relating to Quayside Walkways is cited.	Suggested main modification: Policy DA1 BDA2102

		<p>p.171</p> <p>Retain, enhance and contribute towards a continuous, traffic-free, high quality Quayside Walkway in accordance with planning policy BCAP32: Quayside walkways <u>BG5: Biodiversity and access to Bristol's waterways</u>;</p>
--	--	--

BDA2301 - Land to the south of Warwick Road / Oxford Place, Easton

No representations received.

BDA2302 - Former Barton Hill Nursery School, Queen Ann Road, St Philips

No representations received.

BDA2401 - Bridge Farm, Land at South Hayes, Eastville

Representations received: 1 Object: 1 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.	Policy DA1 states that sites will be developed in accordance with the accompanying development considerations, which address ecological matters, and with all other relevant development plan policies.	No modifications suggested.

BDA2501 - Land south of Zetland Road, Redland

No representations received.

BDA2502 Land at Cossins Road, Redland

No representations received.

BDA2502 Land at Cossins Road, Redland

Main issues raised	Council's comments	Suggested modifications/actions
<i>Issue identified by the council.</i>	A modification to the development considerations is required address issues arising from refused planning application on part of the site (23/00665/F - Redevelopment of existing garages to provide 6 dwellings with associated parking and landscaping) relating to land stability and capacity.	Suggested main modification: Policy DA1 BDA2502 p.193 Development should: Provide suitable access, with sufficient visibility; Ensure that development would not cause harm to trees on adjacent land; Not prejudice the amenity of existing and future neighbouring residents, taking

Main issues raised	Council's comments	Suggested modifications/actions
		<p>into account potential overshadowing impacts; and,</p> <p>Take account of the adjacent Cotham and Redland Conservation Area and the relationship with the adjacent green space; <u>and</u></p> <p><u>be informed by an investigation of land stability, including proposed remediation measures.</u></p> <p>Estimated capacity</p> <p>Estimated capacity of 10-12 homes.</p>

BDA2601 - Land at Two Mile Hill Road / Charlton Road, St George

No representations received.

BDA2602 - 81-83 Two Mile Hill Road, St George

Representations received: 1 Object: 1 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Amending the land use of the proposed allocation to also specify housing for older people was requested by McCarthy Stone (300), who also sought deletion of the reference to the provision of compatible workspace.	Older people's housing is addressed by policy H8: Older people's and other specialised need housing. The approach to site allocations is established by Development Allocations and Designations Process Topic paper including the potential for incorporation of compatible workspace in suitable locations where housing allocations are proposed on existing employment sites, which in this instance is not a requirement.	No modifications suggested.

BDA2603 - Land at Two Mile Hill Road / Waters Road, St George

No representations received.

BDA2605 - Land at Broad Road / Lodge Road, St George

No representations received.

BDA2702 - Land at corner of Bryants Hill and Furber Road, St George

No representations received.

BDA2703 - Land at Nags Head Hill, St George

No representations received.

BDA2801 - Land to the south of Blackswarth Road, Avonview

Representations received: 2 Object: 2 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
<p>The requirement for a mix of uses was objected to by Woodstock Homes Ltd (393) who favoured a solely residential development allocation. They also sought deletion of the requirement for an eight metre buffer to the River Avon and thought reference to the estimated housing capacity should be increased to 85 homes.</p>	<p>The approach to site allocations is established by Development Allocations and Designations Process Topic paper, including the incorporation of compatible workspace in suitable locations where housing allocations are proposed on existing employment sites. The allocation is considered appropriate.</p>	<p>No modifications suggested.</p>
<p>The Environment Agency (465) identified this allocation as being located next to the River Avon, in flood zone 3, and in an area where Bristol Avon Flood Strategy flood defences will be required. It thought flood risk assessments for this site would need to meet these requirements and that reference should be made to development complying with Policy FR2 'Bristol Avon Flood Strategy'.</p>	<p>Policy DA1 states that sites will be developed in accordance with the accompanying development considerations, which includes the requirement for a Flood Risk Assessment, and with all other relevant development plan policies including Policy F2: Bristol Avon Flood Strategy.</p>	<p>Suggested additional modification:</p> <p>An additional development consideration to clarify this point suggested as an additional modification.</p> <p>Development should:...</p> <p><u>not prejudice the implementation of the Bristol Avon Flood Strategy and will be expected to accommodate space for and/or deliver flood protection infrastructure</u></p>

Main issues raised	Council's comments	Suggested modifications / actions
		<u>required as part of the development of the area. Part of the site is within a Flood Defence Policy Area (Policy FR2: Bristol Avon Flood Strategy).</u>

BDA2802 - Part of Soaphouse Industrial Estate, Howard Street

No representations received.

BDA2803 - 222-232 Church Road, St George

No representations received.

BDA2901 - Land at Lanercost Road

No representations received.

BDA2902 - Works at Felstead Road

Representations received: 1 Object: 1 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Reference to the need for development proposals to be supported by a flood risk assessment was advised by the Environment Agency (465) as they identified the site as being in flood zones 2 and 3.	Policy DA1 states that sites will be developed in accordance with the accompanying development considerations and with all other relevant development plan policies.	No modifications suggested.

BDA3002 - 1-7 Smyth Road, Southville

No representations received.

BDA3101 - Greville building, Lacey Road, Stockwood

No representations received.

BDA3201 Land at Sanctuary Gardens, Sneyd Park

Representations received: 1 Object: 1 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.	Policy DA1 states that sites will be developed in accordance with the accompanying development considerations, which address ecological matters, and with all other relevant development plan policies.	No modifications suggested.

BDA3301 - Former St Ursula's High School, Brecon Road

No representations received.

BDA3401 - 122 Bath Road, Totterdown

No representations received.

BSA0103 - Land to the west and south-west of Deering Close, Lawrence Weston

Representations received: 2 Object: 2 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Objection to this allocation was made by Martyn Cordey (359) and Natural England (489) on grounds of potential impacts on habitats for nature, with the latter representor considering the site contained broadleaf woodland, a priority habitat. They felt the proposal was inconsistent with national policy to protect and enhance ecological networks and priority habitats.	This site is allocated in the Site Allocations and Development Management Policies Local Plan (2014). Policy DA1 states that sites will be developed in accordance with the accompanying development considerations, which address ecological matters, and with all other relevant development plan policies.	No modifications suggested.

BSA0111 - Land off Ermine Way, Shirehampton

Representations received: 1 Object: 1 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.	This site is allocated in the Site Allocations and Development Management Policies Local Plan (2014). Policy DA1 states that sites will be developed in accordance with the accompanying development considerations, which address ecological matters, and with all other relevant development plan policies.	No modifications suggested.

BSA0212 - 19-21 Pen Park Road, Southmead

No representations received.

BSA0302 - Coombe House Elderly Persons' Home, Westbury-on-Trym

No representations received.

BSA0404 - BT Depot, Filton Road, Horfield

No representations received.

BSA0502 - Glenside Campus, Blackberry Hill, Fishponds

Representations received: 1 Object: 1 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
While supportive of the allocation in principle, the University of the West of England (408)	This site is allocated in the Site Allocations and Development Management Policies Local Plan (2014). The	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
sought an extension to its boundary to allow for a comprehensive approach to the site's masterplanning.	allocation is considered appropriate. The boundary reflects the open space to the south east which is within a Local Historic Park and Garden and the Conservation Area.	

BSA0513 - Garage site, Woodland Way, Chester Park / Hillfields

Representations received: 1 Object: 1 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.	This site is allocated in the Site Allocations and Development Management Policies Local Plan (2014). Policy DA1 states that sites will be developed in accordance with the accompanying development considerations, which address ecological matters, and with all other relevant development plan policies.	No modifications suggested.

BSA0906 - Car Sales site at 62-74 Bell Hill Road, St George

No representations received.

BSA0907 - 47 - 49 Summerhill Road, St George

No representations received.

BSA1011 - Site adjacent to Holy Cross Church, Dean Lane, Bedminster

Representations received: 5 Object: 5 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Concerns were expressed by Patrick Walker (127), Angela Ferrer Lopez (353), Jonathon Lines (268) and Angela Serjeant (350) that the 'development considerations' for this allocation did not adequately address potential impacts on the adjoining school concerning access, traffic impacts and design matters. An allocation for educational or mixed-uses was preferred.	This site is allocated in the Site Allocations and Development Management Policies Local Plan (2014). Policy DA1 states that sites will be developed in accordance with the accompanying development considerations with all other relevant development plan policies, including Policy T3A: Transport development management and DPM1: Delivering well-designed, inclusive places. The allocation is considered appropriate.	No modifications suggested.
Reference to the need for development proposals to be supported by a flood risk assessment was advised by the Environment Agency (465) as they identified the site as being in flood zone 2.	This site is allocated in the Site Allocations and Development Management Policies Local Plan (2014). Policy DA1 states that sites will be developed in accordance with the accompanying development considerations and with all other relevant development plan policies.	No modifications suggested.

BSA1101 - Bath Road Open Space (west of Totterdown Bridge), Totterdown

Representations received: 5 Object: 5 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
<p>Amendment of the site's estimated housing capacity from 40 to up to 400 homes was sought by Change Real Estate and Abri (425) to reflect site context and planning policies on making the most efficient use of land. Similarly, Tom Gabriel (141) considered the stated capacity figure was too low.</p>	<p>This site is allocated in the Site Allocations and Development Management Policies Local Plan (2014) and has been forward into the submitted local plan. The capacity estimate referred to in the adopted local plan is 40. Capacities do not represent a maximum number of homes. The allocation is for a Temple Quarter Enterprise Zone Opportunity Site which allows for mixed use.</p>	<p>No modifications suggested.</p>
<p>Objection to this allocation was made by Martyn Cordey (359) and Natural England (489) on the grounds of potential impacts on habitats for nature. The latter representor considered it could significantly harm the River Avon SNCI and compromise the maintenance and enhancement of an important ecological corridor along the River Avon close to the city centre.</p>	<p>This site is allocated in the Site Allocations and Development Management Policies Local Plan (2014). Policy DA1 states that sites will be developed in accordance with the accompanying development considerations, which address ecological matters, and with all other relevant development plan policies.</p>	<p>No modifications suggested.</p>
<p>The Environment Agency (465) sought references to the need for development to be set back from the watercourse, supported by a flood risk assessment and consider the requirements of the Bristol Avon Flood Strategy.</p>	<p>This site is allocated in the Site Allocations and Development Management Policies Local Plan (2014). Policy DA1 states that sites will be developed in accordance with the accompanying development considerations and with all other relevant development plan policies.</p>	<p>No modifications suggested.</p>

BSA1103 - Red Lion Works, Greenleaze Road / Wells Road, Knowle Park

No representations received.

BSA1108A - Previously developed land at Novers Lane, east of Hartcliffe Way and west of Novers Lane

No representations received.

BSA1108A - Previously developed land at Novers Lane, east of Hartcliffe Way and west of Novers Lane

Main issues raised	Council's comments	Suggested modifications/actions
<i>Issue identified by the council.</i>	<p>Correction. A modification to the development considerations is required to ensure they properly reflect the local plan's intentions for the site.</p> <p>The development considerations as they appear in the Publication Version November 2023 incorrectly replicate those from the Adopted Site Allocations and Development Management Local Plan (2014) BSA1108 and fail to reflect the November 2022 consultation proposal to revise the adopted allocation to exclude the greenfield part in order to reflect the ecological emergency and subsequent consideration that the nature conservation interest of the larger site is of overriding concern. The modified development considerations proposed here are relevant to the revised smaller site BSA1108A.</p>	<p>Suggested main modification:</p> <p>Policy DA1</p> <p>BSA1108A</p> <p>p.119</p> <p>Development should:</p> <p>be designed to respect the sloping nature of the site, having regard to long distance views and the prominence of the site;</p> <p>be informed by an ecological survey of the site and make provision for compensation and mitigation measures, including</p>

		<p>compensation for the loss of the 'Lowland Meadow', 'Lowland Calcareous Grassland' and semi-improved neutral grassland. The site currently has city wide importance for nature conservation due to the presence and condition of particular species, habitats and/or features; <u>be informed by an ecological survey of the site and make provision for mitigation measures where appropriate, which may include a buffer to the adjacent Site of Nature Conservation Interest;</u></p> <p>integrate appropriate landscaping to ensure that green infrastructure links to the surrounding area are maintained, including links to the Northern Slopes and Crox Bottom;</p> <p>maintain or strengthen the integrity and connectivity of the Wildlife Network;</p>
--	--	--

		<p>be informed by a site-specific flood risk assessment as the area of the site is greater than 1 hectare. This is a requirement of the Government's National Planning Policy Framework. The flood risk assessment should also consider the impacts of the development on the wider Malago catchment to ensure that proposed and existing properties are not subject to increased flood risk; <u>and</u></p> <p>provide for necessary improvements to the surrounding highway / transport network;</p> <p>be designed to take account of nearby industrial uses by addressing any noise, pollution and nuisance issues;</p> <p>provide a children's playground on the site;</p> <p>be informed by a Health Impact Assessment. This should include how the proposals have been</p>
--	--	--

		discussed with local primary health care providers regarding impacts on primary health care services.
--	--	---

BSA1109 - Land adjoining Hartcliffe Way and Hengrove Way, Inn's Court

Representations received: 5 Object: 5 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Objection to this allocation was made by Martyn Cordey (359) and Natural England (489) on grounds of potential impacts on habitats for nature. The latter representor considered the site contained priority habitats and was therefore inconsistent with national policy to protect and enhance ecological networks and priority habitats. They also felt the site to be in a location deficient in access to greenspace and so opposed the allocation as it would further reduce such access.	This site is allocated in the Site Allocations and Development Management Policies Local Plan (2014). Policy DA1 states that sites will be developed in accordance with the accompanying development considerations, which address ecological matters, and with all other relevant development plan policies.	No modifications suggested.
Knowle West Regeneration Residents Planning Group / Knowle West Future (373), Inns Court Residents Group (57) and Tony Pitt (317) raised concern about the appropriateness of the allocation's boundary and estimated	This site is allocated in the Site Allocations and Development Management Policies Local Plan (2014). The allocation acknowledges the presence of the planning permission for a youth zone facility. It also stresses the	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
housing capacity given the planning permission for the 'Youth Zone' facility on this site. Ensuring suitable green space was provided for recreation and wildlife in any revised allocation boundary was also advocated.	estimated number of homes given is for the whole of site BSA1109.	

BSA1115 - Former Florence Brown school, west of Leinster Avenue

Representations received: 1 Object: 1 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Removing this allocation or amending it to reflect the recent planning permission for housing (ref. 20/03297/F) was advised by Knowle West Regeneration Residents Planning Group / Knowle West Future (373).	This site is allocated in the Site Allocations and Development Management Policies Local Plan (2014) and has been carried forward.	No modifications suggested.

BSA1116 - Open spaces either side of Inns Court Drive

Representations received: 5 Object: 5 Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
<p>Objection to this allocation on grounds of potential impacts on habitats for nature was made by Inns Court Residents Group (57), Martyn Cordey (359) and Natural England (489). The latter representor considered the site contained priority habitats and was therefore inconsistent with national policy to protect and enhance ecological networks and priority habitats. They also felt the site to be in a location deficient in access to greenspace and so opposed the allocation as it would further reduce such access.</p> <p>Inns Court Residents Group (57) and Jiorgia Toye (243) also raised concerns about the importance of the sites' value for recreation, tranquility and openness.</p>	<p>This site is allocated in the Site Allocations and Development Management Policies Local Plan (2014). Policy DA1 states that sites will be developed in accordance with the accompanying development considerations, which address ecological matters, and with all other relevant development plan policies.</p> <p>The development considerations also make provision for the inclusion of a children's playground and formal green space.</p>	<p>No modifications suggested.</p>

BSA1118 - Broad Plain House and associated land, Broadbury Road

Representations received: 2

Object: 2

Support: 0

Main issues raised	Council's comments	Suggested modifications / actions
Removing this allocation to reflect construction being underway on a residential development scheme (ref. 21/00816/F) was advised by Knowle West Regeneration Residents Planning Group / Knowle West Future (373).	This site is allocated in the Site Allocations and Development Management Policies Local Plan (2014). The allocation and has been carried forward, although the development is now under construction.	No modifications suggested.
Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.	This site is allocated in the Site Allocations and Development Management Policies Local Plan (2014). Policy DA1 states that sites will be developed in accordance with the accompanying development considerations, which address ecological matters, and with all other relevant development plan policies.	No modifications suggested.

Omissions

Omitted policies

Main issues raised	Council's comments	Suggested modifications / actions
A policy supporting university-related development at established campuses outside	University related development on established campuses would be consistent in principle with existing university	No modifications suggested.

Main issues raised	Council's comments	Suggested modifications / actions
of the city centre was sought by the University of the West of England (408).	use. An additional policy is not therefore required to support appropriate higher education development.	
A policy on adaptive reuse of historic buildings, promoting their integration into new development projects was advocated by Bristol Conservation Advisory Panel (340).	The policies in the local plan allow for and support such re-use.	No modifications suggested.

Other omissions

Main issues raised	Council's comments	Suggested modifications / actions
The absence of a monitoring framework which sets out the targets for housing was raised by the Home Builders Federation (414).	The housing requirement is contained in Policy H1. A main modification is proposed to add a section related to planning monitoring.	<p>Suggested main modification: Chapter 1 – A new local plan for Bristol</p> <p>p. 4, Add new paragraph after 1.15</p> <p><u>Monitoring and review</u></p> <p><u>Monitoring of local plan policies enables the council to understand their effectiveness in delivering the plan's vision</u></p>

Main issues raised	Council's comments	Suggested modifications / actions
		<p><u>and objectives and informs whether review is required. The Authority's Monitoring Report is the principal mechanism for monitoring the local plan. It will report on the progress made in achieving targets set for key strategic policies relating to housing and workspace provision. The council will review the local plan within three years of its adoption. The Authority's Monitoring Report will inform this review as its findings may identify the need for a partial or full local plan update.</u></p> <p>Reason: To add a monitoring section covering monitoring and review including a commitment to an early plan review.</p>

Main issues raised	Council's comments	Suggested modifications / actions
A lack of a housing trajectory was objected to by the Home Builders Federation (414).	Policy H1 deals with the housing requirement and a trajectory is included in the supporting evidence.	No modifications suggested.
A lack of reference to (and availability of) a statement of common ground with the other West of England local planning authorities was raised by representors from the housing development industry / landowners and Kevin Chidgey (345).	Two statements of common ground have been published.	No modifications suggested.

Other comments

Main issues raised	Council's comments	Suggested modifications / actions
Regarding 'Appendix C – Bristol heat networks', Natural England (489) noted that 'Figure C3 Indicative Strategic Heat Main route' shows areas of the Strategic Heat Main route would be within 500m of the Severn Estuary SPA/SAC/Ramsar/SSSI and could therefore result in disturbance to SPA/Ramsar/SSSI-protected birds.	The map is indicative. Impacts on relevant sites would be taken into account in any decisions on the development of the heat main in accordance with policies and regulations.	No modifications suggested.