

Bristol City Council's response to Inspectors' Document IN3

This statement sets out the council's response to the Inspectors' Supplementary Preliminary Questions (IN3).

Council's introduction

The Inspectors' questions are shown below in ***bold italics*** with a border, following any preamble to the question also in ***bold italics***. The council's responses are shown in normal typeface below the Inspector's questions.

Responses to Inspectors' questions

Duty to Co-operate

The Council's answer to PQ1 provides some additional information as to how it considers it has carried out the Duty with neighbouring authorities. You will recall, however, that PQ1 requested information relating to the timing and chronology of engagement and the main mechanisms used. While the response to this refers to various Member and officer groups, and meetings that have taken place, this does not provide any detail as to the specific timings of these meetings or what was discussed. In this regard, there remains little detail or clarity as to how and when discussions have taken place in relation to the preparation of this Plan, particularly in terms of the issue of Bristol's unmet housing need. This includes information as to how and when this issue was identified and what discussions have taken place to seek to address it, including anything specific prior to the letter dated 31 October 2023.

PQ2 requested evidence relating to how the Council has carried out the Duty with regards to prescribed bodies. The Council's response states that prescribed bodies have cooperated where necessary throughout the preparation of the Plan and have been consulted at different stages. In particular, we note reference to 'strategic forum' meetings. However, these references provide no details on what strategic matters, as defined by the legislation, have been identified or how they have been addressed as part of the Duty. Moreover, there is no detail about the timing or frequency of any meetings that took place or who attended. In addition, we have noted the lack of any Statements of Common Ground with any prescribed bodies.

We therefore feel that to assist in our consideration of this issue, we would benefit from a specific Duty to Co-operate Topic Paper or Statement, which provides a more detailed and structured account of how the Council has engaged constructively, actively and on an on-going basis to maximise the effectiveness of the Plan. We would again draw your attention to paragraph 1.15 of the Local Plan Procedure Guide for advice on what such a statement should include.

SPQ1. The Council is requested to provide a Duty to Cooperate Topic Paper or Statement which meets the requirements of paragraph 1.15 of the Local Plan Procedure Guide and should include activities related to both neighbouring authorities and relevant prescribed bodies in the preparation of this Plan.

Council's response

A topic paper on **Maintaining Effective Cooperation** has been provided with this response. This paper can be added to the examination library.

The topic paper gives further information on the process of cooperation with the neighbouring authorities and others related to the local plan during the period of its preparation. It provides information on the mechanisms of cooperation and key milestone actions and meetings which illustrate how the duty was met.

SPQ2. The response to PQ1 indicates that the Council has made a response to the consultation on South Gloucestershire's emerging Local Plan. It would be helpful if a copy of that response could be provided.

Council's response

Bristol City Council's response to the South Gloucestershire Council local plan consultation is appended to the Maintaining Effective Cooperation topic paper.

Habitats Regulation Assessment

In response to PQ5, we are disappointed that Natural England have not responded to your requests for comment on the Appropriate Assessment (AA). While we recognise a response may be received prior to the above deadline, if this does not transpire, it would be helpful to understand if Natural England have provided the Council with any reason for the delay.

SPQ3. Unless Natural England have already responded to the AA by the above deadline, the Council are requested to provide an explanation as to what reasons they have been given for the failure to respond. Should a response be provided before this date, then this should be provided to us as soon as possible, along with a note from the Council indicating what, if any, implications this may have for the Plan.

Council's response

The council contacted Natural England again on 7 October 2024, advising them of the council's response to Inspectors' Document IN2 (EXA024) and asking if they had any observations that would assist the examination process.

To date no response has been received. The agency had acknowledged receipt of the council's previous requests but did not give reasons for an absence of response.

The request has been further restated. The council will advise on any response from Natural England.

Site Selection Methodology

The response to our questions on the site selection methodology require some further clarification and have highlighted some additional issues on which we find additional information helpful.

SPQ4. The response to PQ13 refers to various mapping and assessment exercises which have taken place. Other than the SHLAA1, is there any other

document which sets out in detail the results of the assessments which took place?

Council's response

Other than the SHLAA, the other document which details the results of the assessments is the 2019 consultation Annex – Draft Development Allocations (PCD002a). This includes proposed allocations, reasons for the allocation, draft development considerations and, where stated, estimated capacities. Sites have also been assessed against the objectives of the Sustainability Appraisal (Table 5, 5.2 Appraisal of Site Allocations, Sustainability Appraisal Non-Technical Summary CSD004E).

This process has resulted in land use allocations that are identified on a policies map (paragraph 23 NPPF). The process largely replicates that undertaken in the 2014 Site Allocations and Development Management Policies Local Plan which was adopted in 2014, where the output of the assessments was published at the consultation (Regulation 18 stage) as options for Site Allocations.

SPQ5. The response to PQ17 provides some further information in relation to allocations brought forward from previous plans. It indicates two locations were identified as no longer being considered suitable due to biodiversity issues. However, other than point us to previous consultation documents, the response does not appear to indicate where, if at all, the assessment of previous unimplemented allocations has been documented. In this regard, we also note that these allocations have not been subject to Sustainability Appraisal. Given what paragraph 122 of the National Planning Policy Framework says about reviewing existing allocations, can the Council confirm on what basis these sites have been brought forward and whether any assessment is documented? If these assessments do not exist, then can the Council explain why it does not consider this to have been necessary?

Council's response

The Local Plan Review was initially conceived as a partial review of the existing adopted local plan. The retention of many adopted policies and site allocations was initially proposed. Unimplemented site allocations from the existing adopted plan were proposed to be brought forward into the new local plan unless significant changes in circumstances had occurred.

This approach is addressed in the Sustainability Appraisal. Appendix 4 of the SA Predicting and evaluating the effects of Publication Version November 2023 Draft Local Plan Sites (CSD004d), explains why the retained allocations were not subject to further assessment through the Sustainability Appraisal:

'For the purposes of retained Site Allocations from both the Site Allocations and Development Management Policies Local Plan (2014) and the Bristol Central Area Plan (2015), it is not considered necessary nor proportionate to reappraise the sustainability effects of these sites beyond that which was undertaken as part of the Bristol Central Area Action Plan Sustainability Appraisal February 2012 and Site Allocations and Development Management Policies Sustainability Appraisal 2013. This approach is broadly supported by the Planning Practice Guidance which indicates that the SA does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in

the Local Plan. It is also supported by the SEA Directive which seeks to reduce duplication of assessment, and to take account of assessments carried out at different levels of the hierarchy of plans and programmes.'

The pathway of existing allocations through the local plan review process:

Bristol Local Plan Review Consultation February 2018 (Issues stage)

The approach of bringing unimplemented site allocations forward was initially proposed in the Bristol Local Plan Review February 2018 which stated:

'Existing allocations are proposed to be retained to contribute to the supply of land for new homes.' (Chapter 8 paragraph 8.2 table).

At this point the existing local plan's site allocations were relatively recent, having been included in local plans adopted four (SA&DM Policies Local Plan) and three years (Bristol Central Area LP) previously. Many remained unimplemented or uncompleted.

Two respondents commented on existing allocations at that stage, neither of whom objected to the principle of retaining allocations.

Bristol Local Plan Review Policies and Development Allocations Consultation March 2019

Following on from the issues stage consultation, the Bristol Local Plan Review Policies and Development Allocations Consultation March 2019 (PCD002) stated:

'the existing local plan contains numerous site allocations which will be retained as part of this local plan review' (paragraph 7.15)

This was accompanied by a list of policies and site allocations that were proposed for retention. The retained policies list, a copy of which has been provided, was published as part of the consultation and included 109 of the existing adopted local plan's 130 allocations which are listed in **Appendix 3**.

In 2019 one general comment relating to retained site allocations was received which questioned how policy mechanisms in the revised plan would be applied to the retained allocations.

Bristol Local Plan Review Draft Policies and Development Allocations Further consultation - November 2022

During the period the local plan was being progressed, the strategic context changed with withdrawal of the West of England Joint Spatial Plan in 2020 and the halting of the Spatial Development Strategy in 2022. This resulted in a need for revisions to the emerging local plan and for it to be a replacement of the whole existing plan, rather than a partial review. In November 2022 a further consultation was carried out reflecting these changes.

The consultation in 2022 reiterated the approach of bringing forward site allocations from the existing local plan as had been discussed in previous plan making stages:

'that development site allocations from the existing local plan which had not yet been developed should be retained in the new local plan. It is proposed that this should remain the approach...' (paragraph 11.15 Bristol Local Plan Review Draft Policies and Development Allocations Further Consultation November 2022 - PCD003)

There were stated exceptions to this approach:

‘...with the exception of two locations where a change is considered necessary to reflect the greater priority for biodiversity required in response to declaration of the ecological emergency’

The exceptions to the overall approach of bringing forward unimplemented allocations arose from the declaration of the ecological emergency by Bristol’s One City partners (the council and various city stakeholder bodies) in 2020. To reflect a greater priority for biodiversity, the 2022 consultation proposed that the following unimplemented site allocations from the existing adopted local plan should no longer be included in the new local plan:

BSA1201	Land at Broomhill, Brislington
BSA1114	Land at Novers Hill, adjacent to industrial units
BSA1119	Land to east of Hartcliffe Way, south of the Waste Depot
BSA1108	Land at Novers Hill, east of Hartcliffe Way and west of Novers Lane / Novers Hill ¹

These existing greenfield allocations were designated as sites of nature conservation interest (local wildlife sites) at the time of their original allocation in the existing adopted local plan in 2014. The allocations’ ‘development considerations’ addressed this underlying local wildlife site designation with requirements for mitigation or compensation for loss or damage to the nature conservation interest.

The proposal to remove these existing allocations reflects the greater priority for biodiversity required in response to the declaration of the ecological emergency outlined above. Instead of development allocations with provisions for mitigation and compensation of impacts on biodiversity, the proposed approach was that the sites should not be developed. This proposal was consistent with the approach outlined in the Plan-making guidance in the NPPG that indicates that new environmental priorities are a consideration when determining whether policies within a plan should be updated (paragraph 065).

A representation received as part of the 2022 consultation objected to the discontinuation of BSA1108, Land at Novers Hill, east of Hartcliffe Way and west of Novers Lane / Novers Hill. A comment was also made that only sites compliant with the current NPPF and Environment Act 2021 should be retained.

Bristol Local Plan Publication Version November 2023

By the time the local plan had reached its publication stage in 2023, many of the unimplemented allocations proposed for retention in 2019 had been implemented. Implemented allocations were not brought forward into the publication version.

¹ Part of this site was to become ‘BSA1108A - previously developed land at Novers Lane, east of Hartcliffe Way and west of Novers Lane’ This comprised previously developed land was not part of the site of nature conservation interest.

Therefore 39 unimplemented allocations remain, 70 fewer than the 109 originally proposed for retention in 2019 (CDS002).

NPPF Paragraph 122

NPPF (September 2023) paragraph 122 states:

‘Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and

b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.’

This paragraph is understood in its context of the NPPF chapter headed ‘*Making Efficient Use of Land*’, which explicitly refers to ‘*meeting the need for homes*’, with strategic policies required to set out a strategy for accommodating objectively assessed needs ‘*in a way that makes as much uses as possible of previously-developed or ‘brownfield’ land*’ (paragraph 119). Read in this context, paragraph 122 is to ensure that efficient use of brownfield or other land for predominantly housing need is not thwarted by outdated development allocations.

The unimplemented allocations proposed for retention could be described as remaining within their sell-by date relative to the existing local plan period to 2026. They remain consistent with national planning policy. 90% of the retained allocations (35) include an element of housing and most are on brownfield land. The site allocations from the existing local plan are continuing to be implemented with the 109 allocations proposed for retention in 2019 now reduced to 39 reflecting the progress being made on delivery. The remainder are expected to now come forward within the new plan period.

Paragraph 122 refers to ‘*changes in the demand for land*’. In Bristol there is increasing housing need creating demand for housing land. Therefore, the approach to bringing forward unimplemented permission is considered appropriate.

It is also notable that the NPPG, when addressing how often a plan or policies should be reviewed in paragraph 062, cites changes in circumstances as a key factor, and proceeds by stating:

‘Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method, or has been subject to a cap where the plan has been adopted using the standard method. This is to ensure that all housing need is planned for as quickly as reasonably possible.’

The approach of bringing forward existing allocations is supported by significant changes in circumstances represented by the substantial and increased local

housing need since the adoption of the Site Allocations and Development Management Policies Local Plan (2014) and the Bristol Central Area Plan (2015). As such, the demand for land for housing can be seen to have increased.

SPQ6. Appendix D of the SHLAA identifies suggested allocations that have not been considered suitable for allocation. Appendix 4 of the Sustainability Appraisal identifies only one site as a 'reasonable alternative'. Could the Council clarify: (a) where in the evidence base are the assessments of sites not considered suitable for allocation in the Plan (ie where can a comparison of sites considered suitable for allocation be compared to those sites considered not suitable for allocation)? (b) why were sites identified in Appendix D of the SHLAA not considered 'reasonable' alternatives for consideration through the SA?

Council's response

Appendix D of the SHLAA includes 55 sites. A summary of Appendix D grouped by summary outcome is included in **Appendix 4** of this response.

Of these sites, 21 are either within a development strategy area ('DS' policies) which is a focus for development or are identified as a site allocation. Therefore, these sites are subject of proposed allocated/designated for development in the new local plan.

On a further 12 of the Appendix D sites a development allocation was not appropriate. Allocation for development would be incompatible with proposed designations for the land, for example where they met the criteria for Local Green Space designation, were needed for industry and distribution (Industry and Distribution Areas) or needed to be safeguarded for potential transport links.

On 9 of the sites in Appendix D, allocation was not required because the use proposed was the same as the existing use and a further 5 of the sites already benefited from planning permission. An additional 2 sites were not included as allocations because of their limited size.

The remaining 6 referred to in Appendix D were not proposed for allocation. These six sites were submitted as part of the on-going call for sites and local plan preparation process from 2019 onwards. They did not go through the initial assessment which informed the preparation of the 2019 consultation. The SHLAA appendix notes that the 'policy context allows for alternative development'. In these cases there had been insufficient evidence to enable a detailed allocation to be included and a lack of sufficient certainty that they would come forward for residential use. A detailed explanation of each of these sites is included in **Appendix 5** of this paper. Whilst the sites have not been proposed as allocations, the local plan's policies would not rule out an appropriate form of development be that redevelopment or intensification of development. Any proposals would be considered having regard to the prevailing designations and the policies of the plan as a whole.

The sites referred to were not identified as reasonable alternatives in the Sustainability Appraisal because the possibility of development has not been precluded. They have not been excluded in favour of other sites. They could potentially come forward for development as unidentified sites within the context of the local plan as a whole.

SPQ7. The response to PQ13 states that the SHLAA "documents sites which have not been allocated for numerous reasons, but which may not be

inappropriate for development". We also note that, in some circumstances, Appendix D of the SHLAA states that a site has not been allocated but the "policy context allows for alternative development". Could the Council provide further clarification about what it means by these statements; for example, would residential development be considered an appropriate or suitable alternative development?

Council's response

The response to SPQ6 above provides the answer to SPQ7.

Gypsies and Travellers

SPQ8. In response to PQ93 the Council have indicated there is a recent approval of the use of vacant land at Western Drive Hengrove for the development of a permanent traveller site subject to planning consent (Cabinet decisions 7th February 2023 - Item 8). Could the Council please indicate how many plots that site is likely to accommodate against the requirement of a total of 67 pitches and when an application for planning permission is likely to be made or determined? Have the Council granted planning permission for any permanent pitches since January 2020 (the date set out in Appendix D of EVH04)?

Council's response

The city council's Gypsy Roma Traveller team oversee a process of identifying and assessing potential sites across the city to provide for the accommodation needs of gypsies and travellers. This process has already identified a potential permanent gypsy and traveller site on land at Western Drive, Hengrove that would provide 7 pitches, with a planning application expected to be submitted early in 2025. A further permanent gypsy and traveller site is currently under consideration, with the council expected to make a decision on the suitability of the site for this use, subject to planning consent, by Spring 2025.

Established provision for gypsies and travellers in Bristol includes a permanent site (12 pitches) and a transit site (20 pitches). There is a permanent site (8 plots) for travelling showpeople. No further planning permissions have been granted for permanent pitches since January 2020.

SPQ9. In response to PQ94 the Council indicate that the definition of travellers set out in Planning policy for traveller sites has had no significant implication for the results of the Bristol Gypsy and Traveller Accommodation Assessment (EVEH04). Could the Council please provide an explanation as to why they consider this is the case?

Council's response

Opinion Research Services (ORS) prepared the council's accommodation assessment and they have advised on the implications of the update to the definition of gypsies and travellers, set out in Planning policy for traveller sites (PPTS), for the results of the Bristol Gypsy and Traveller Accommodation Assessment (GTAA)(EVEH04). ORS identified 4 households who did not meet the previous definition but who would now meet the current definition. However, as all four households live on an existing permanent public site these were assessed as

generating no current or future need as the households comprise elderly couples or single adults with no children living with them. On this basis no additional need for gypsy and traveller pitches will arise. The assessment figures for need therefore remain the same as set out in the GTAA (EVEH04).

Other matters

The response to PQ68 suggests the Council does not consider it necessary to set out a housing requirement for designated neighbourhood areas because the associated Neighbourhood Plans have already been ‘made’.

SPQ10. The Council acknowledges that the Plan does not set any housing requirements for designated neighbourhood areas. Does reference in the Council’s response to the made Neighbourhood Development Plans (NDP) mean that it does not consider it needs to set a requirement to comply with paragraph 66 of the NPPF?

Council’s response

The council does not consider that is necessary to set a housing requirement for the six designated neighbourhood areas in Bristol for the reasons set out below.

A map of the neighbourhood areas is provided at Appendix 1. Three of the designated neighbourhood areas have made NDPs. None of these NDPs contain a housing requirement for their respective neighbourhood areas or site allocations for housing development.

Since preparation of the local plan commenced in 2018, no neighbourhood planning bodies – either designated or prospective – have sought assistance from the council to identify a housing requirement for their neighbourhood area. National policy provides support for designated neighbourhood planning bodies to decide the scope of their neighbourhood plans with no requirement to plan for housing². No neighbourhood planning body has expressed to the council their intention that any updated or new NDP will plan for meeting housing need. There is currently only one designated neighbourhood planning body in Bristol: Old Market Community Association. Representations made by the Association (respondent ref. 233) to the Local Plan Publication Version (CSD001) did not raise concern at the absence of a housing requirement for the Old Market Quarter neighbourhood area.

As demonstrated by table NDP1 below, to the council’s knowledge there is presently no neighbourhood planning body – either designated or prospective – actively working on reviewing or preparing a NDP. Providing and testing housing requirement figures for neighbourhood areas where no neighbourhood plan-making activity is currently taking place is not consider appropriate in the circumstances.

The council considers that there are relevant considerations, as set out above, that need to be balanced against paragraph 66 of the NPPF, which mean that it is not necessary or appropriate for the local plan to provide a housing requirement for Bristol’s designated neighbourhood areas.

This approach is consistent with housing requirement / distribution policies of recently adopted local plans including Eastleigh (adopted 2022), Islington (2023),

² Planning Practice Guidance: [Preparing a neighbourhood plan or Order](#): Paragraph: 104 Reference ID: 41-104-20190509

Wakefield (2024), Waltham Forest (2024) and Wandsworth (2023), more detail of which is provided at **Appendix 2**. In the circumstances of their areas, these authorities also considered it appropriate to not set specific housing requirements for their designated neighbourhood areas. The [report](#) of the examination of the Wakefield District Local Plan adopted on 24 January 2024 noted that the plan’s housing requirement policy had not identified a requirement for the district’s five designated neighbourhood areas. The Inspector concluded however that:

‘...there is no evidence before me that any Neighbourhood Plans currently being prepared are intending to allocate housing sites or identify housing need. If the position changes it could be re-visited as part of a future Local Plan review.’

The Bristol Local Plan will be reviewed five years after adoption with a particular focus on housing needs and delivery. The council considers that, if work to update or produce NDPs commences following adoption of the local plan and designated neighbourhood planning bodies express an intention to plan for meeting housing need, the issue of setting a housing requirement for the designated neighbourhood areas could be revisited as part of the local plan review.

Any review of existing or preparation of new NDPs would also need to be carried out in the context of national policy. This requires neighbourhood plans to not undermine strategic policies of the development plan. This would be considered as part of the independent examination of the NDP when its policies would be assessed for general conformity with the strategic policies (NPPF September 2023 - para. 29 and footnote 18). This process allows a suitable assessment to be made of the appropriateness of the NDPs proposed policies, the scope and content of which will be determined by the neighbourhood planning body having regard to the issues it considers most relevant to address.

Table NDP1: Current position of designated neighbourhood areas, neighbourhood planning bodies and neighbourhood development plans in Bristol

Name of designated neighbourhood area	Date of designation	Name of designated neighbourhood planning body	Status of neighbourhood development plan	Comment
Hengrove and Whitchurch Park	7 November 2016	N/A. The Hengrove and Whitchurch Park Neighbourhood Planning Forum’s designation expired on 7 November 2021.	The Hengrove and Whitchurch Park neighbourhood development plan was made by the council on 19 March 2019.	The council is not aware of any recent neighbourhood planning activity to review the made plan.
Knowle West	27 March 2013	N/A. The Knowle West Area Neighbourhood Development	N/A	The council is not aware of any recent neighbourhood

Name of designated neighbourhood area	Date of designation	Name of designated neighbourhood planning body	Status of neighbourhood development plan	Comment
		Forum decided to close in June 2015. Its designation was withdrawn on 21 August 2015.		planning activity.
Lawrence Weston	31 January 2013	N/A. Lawrence Weston Neighbourhood Planning Forum's designation expired on 21 May 2023.	The Lawrence Weston neighbourhood development plan was made by the council on 14 March 2017.	The previously designated neighbourhood planning body made an enquiry to the council in March 2024 about applying for re-designation but no contact has been made since. The council is not aware of any recent neighbourhood planning activity to review the made plan.
Lockleaze	30 July 2012	N/A. Lockleaze Voice Neighbourhood Development Forum's designation expired on 30 July 2017.	N/A	The council is not aware of any recent neighbourhood planning activity.
Old Market Quarter	31 January 2013	Old Market Community Association – designated 18 October 2024	The Old Market Quarter neighbourhood development plan was made by the council on 15 March 2016.	The council is not aware of any recent neighbourhood planning activity to review the made plan.
Redcliffe	30 July 2012	N/A. The Redcliffe Residents	N/A	The council is not aware of any recent

Name of designated neighbourhood area	Date of designation	Name of designated neighbourhood planning body	Status of neighbourhood development plan	Comment
		Action Group and Neighbourhood Forum's designation expired on 26 November 2023.		neighbourhood planning activity.

SPQ11. The plan periods of the three NDPs run to 2030. The Local Plan period runs to 2040. Without the requirements set out in paragraph 66 of the NPPF, on what basis would any review of the NDPs be undertaken?

Council's response

The plan periods of the three made NDPs in Bristol are:

- Hengrove and Whitchurch Park NDP: 2017 – 2030
- Lawrence Weston NDP: 2015 – 2030
- Old Market Quarter NDP: 2015 – 2026

As noted in response to SPQ10, the council is not aware of any activity presently to review the made NDPs. None of the made NDPs plan for meeting a housing requirement or allocate sites for housing development. No neighbourhood planning bodies – either designated or prospective – have requested the council identifies a housing requirement for their designated neighbourhood areas. Nor have they indicated that any updated NDPs will plan for meeting housing need. There is only one currently designated neighbourhood planning body in Bristol. That body (the Old Market Community Association) raised no objection to the absence of a housing requirement for the Old Market Quarter neighbourhood area in its representations to the Local Plan Publication Version (CSD001).

Any review of the made NDPs would be undertaken in the context of the need to accord with national policy. This provides support for designated neighbourhood planning bodies to decide the scope of any NDP update with no requirement to review made plans³ or plan for housing⁴.

National policy also makes clear that neighbourhood plans should not undermine the strategic policies of the development plan. This would be considered as part of any independent examination of an updated NDP when its policies would be assessed for general conformity with the strategic policies (NPPF September 2023 - para. 29 and footnote 18). This process would allow a suitable assessment to be made of the

³ Planning Practice Guidance: [Updating a neighbourhood plan](#): Paragraph: 084 Reference ID: 41-084-20190509

⁴ Planning Practice Guidance: [Preparing a neighbourhood plan or Order](#): Paragraph: 104 Reference ID: 41-104-20190509

appropriateness of the NDPs updated policies, the scope and content of which will be determined by the designated neighbourhood planning body having regard to the issues it considers to be of most relevance.

The Bristol Local Plan will be reviewed five years after adoption with a particular focus on housing needs and delivery. Following adoption of the local plan, if work to update the made NDPs commences and designated neighbourhood planning bodies express an intention to plan for meeting housing need, the council considers that the issue of setting a housing requirement for the designated neighbourhood areas could be revisited as part of the local plan review.

SPQ12. Paragraph 67 of the NPPF refers to situations where it is not possible to provide a requirement figure for a neighbourhood area. Can the Council confirm whether or not any designated neighbourhood planning body has requested an indicative figure be provided?

Council's response

The council can confirm that no designated neighbourhood planning body has requested an indicative figure be provided.

As noted in response to SPQ10, there is currently only one designated neighbourhood planning body in Bristol. Old Market Community Association is the designated neighbourhood forum for the Old Market Quarter neighbourhood area for the *period* 18 October 2024 to 17 October 2029. Representations made by the Association (representor ref. 233) to the Local Plan Publication Version (CSD001) did not raise concern at the absence of a housing requirement for the Old Market Quarter neighbourhood area.

As set out in the table above, the designations of neighbourhood planning bodies in the five other designated neighbourhood areas in Bristol have either expired or been ended voluntarily by the body. To the council's knowledge there is currently no neighbourhood planning body – either designated or prospective – actively working on reviewing or preparing a NDP.

PQ137 referred to the Environment Agency's representations, and potential additional Bristol Avon Flood Strategy modelling. Your response did not confirm whether this modelling had been completed or, if not, when this modelling is likely to be completed.

SPQ13. Could the Council confirm whether the additional modelling for the Bristol Avon Flood Strategy has been carried out since the Regulation 19 consultation took place? If so, have the results been published? If not, is additional modelling expected to be carried out and what timescales are envisaged?

Council's response

The additional modelling for the Bristol Avon Flood Strategy that is referred to in the Environment Agency's representations has been completed and the council is in the process of incorporating the most up to date information in to the Level 2 SFRA. The council aims to have this published by the time of the examination hearings.

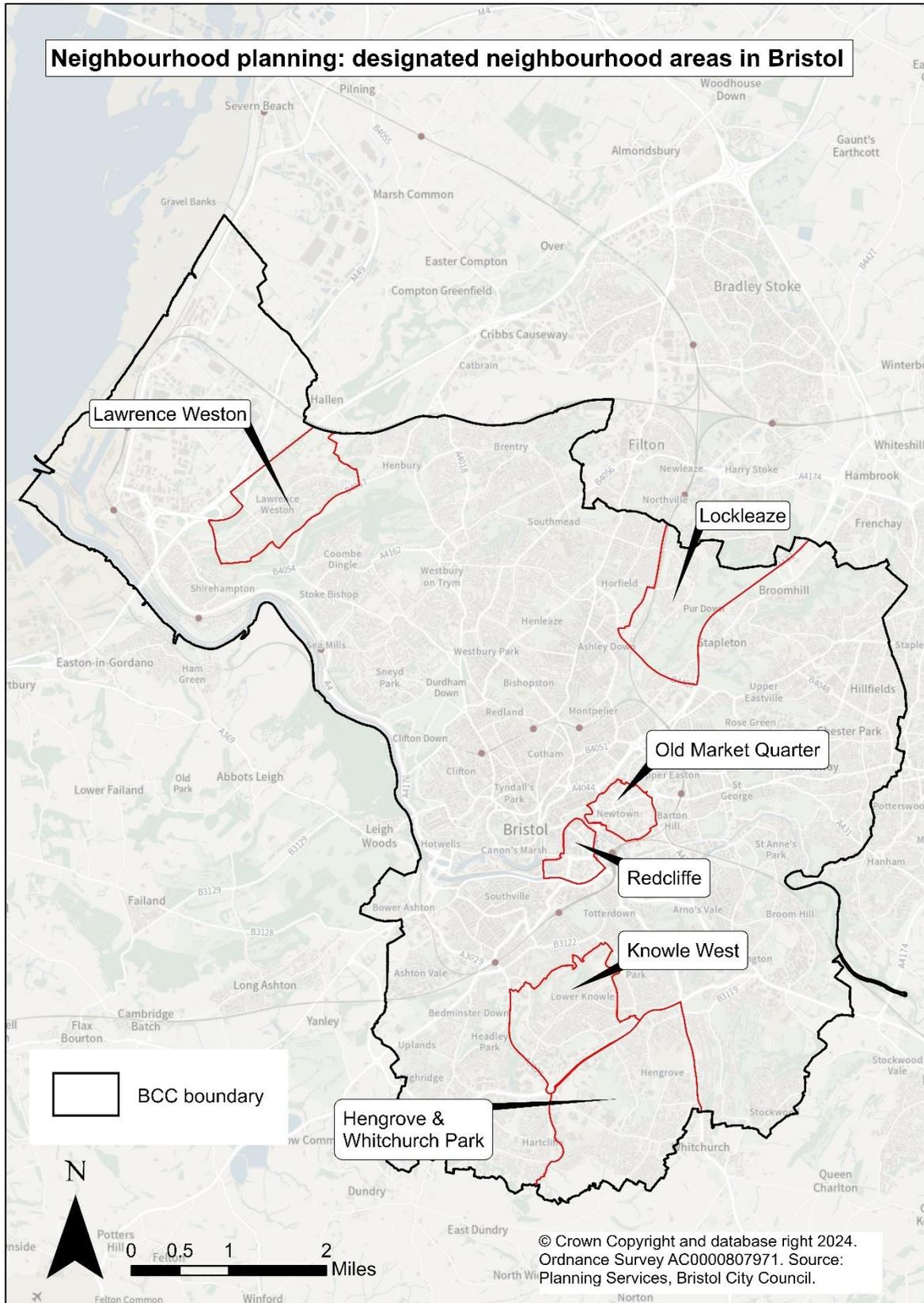
The Environment Agency's representation includes the following further comment:

“The alignment of the BAFS defences shown on the Policies Map needs to be expanded slightly, especially around Netham, to incorporate the different options for alignment described in the Outline Business Case for the BAFS. The key priority issue is updating the SFRA Level 2.”

The Outline Business Case for the Bristol Avon Flood Strategy was approved by Bristol City Council’s then cabinet in January 2024, after the publication of the Bristol Local Plan. To correctly reflect the Outline Business Case and taking account of the Environment Agency’s representation, the council suggests a main modification to amend the alignment of the Flood Defence Policy Areas designation (policy FR2) in the Netham area. The designation as presently shown on the Policies Map (first image below) would be amended to align with the Outline Business Case (second image below).



Appendix 1 – Map of designated neighbourhood areas as referred to in response to SPQ10



Appendix 2 – Examples of local plans referred to in response to SPQ10

Adopted [Eastleigh Borough Local Plan](#) April 2022

The local plan housing requirement is provided in Strategic Policy S2 ‘Approach to new development’. The approach to the distribution of the requirement is set out in Strategic Policy S3 ‘Location of new housing’. No requirement is set for the borough’s two designated neighbourhood areas.

Adopted [Islington Local Plan](#) September 2023

The local plan housing requirement is set out in Policy H2 ‘New and existing conventional housing’. The requirement is directed to eight Spatial Policy Areas identified under Policies SP1-8 through site allocations, with the expectation that the requirement will also be met through the development of windfall sites across the borough. No requirement is set for the borough’s three designated neighbourhood areas.

Adopted [Wakefield District Local Plan](#) January 2024

The local plan housing requirement and its distribution is set out in Policy SP5 ‘Scale and Distribution of Additional Housing’. No requirement is set for the district’s five designated neighbourhood areas.

Adopted [Waltham Forest Local Plan](#) February 2024

The local plan housing requirement is set out in Policy 2 ‘Scale of Growth’. The requirement’s distribution is provided by Policy 4 ‘Location of Growth’. No requirement is set for the borough’s designated neighbourhood area.

Adopted [Wandsworth Local Plan](#) July 2023

The local plan housing requirement and its distribution is set out in Policy SDS1 ‘Spatial Development Strategy 2023 – 2038’. No requirement is set for the borough’s designated neighbourhood area.

Appendix 3 – Development site allocations proposed to be retained in the Bristol Local Plan Review consultation March 2019

The sites below were listed in a consultation document in 2019. The sites which are included in the Bristol Local Plan Publication Version November 2023 are emboldened. All other sites have been implemented or are no longer proposed as retained site allocations:

- BSA0101: Part of Henacre Open Space, Lawrence Weston (Site is also allocated within the Lawrence Weston Neighbourhood Development Plan)
- BSA0102: Land at former Lawrence Weston Campus of City of Bristol College, Lawrence Weston (Site is also allocated within the Lawrence Weston Neighbourhood Development Plan)
- **BSA0103: Land to the west and south-west of Deering Close, Lawrence Weston (Site is also allocated within the Lawrence Weston Neighbourhood Development Plan)**
- BSA0104: Former Sea Mills Infant School, Sea Mills (Currently expected to be used for education)
- **BSA0111: Land of Ermine Way, Shirehampton**
- BSA0203: Former Dunmail Primary School, Southmead
- **BSA0212: 19-21 Pen Park Road, Southmead**
- **BSA0302: Coombe House Elderly Persons' Home, Westbury-on-Trym**
- BSA0402: Bonnington Walk former allotments site, Lockleaze
- BSA0403: Romney House and Lockleaze School, Lockleaze
- **BSA0404: BT Depot, Filton Road, Horfield**
- BSA0405: Former Romney Avenue Junior School, Lockleaze
- BSA0407: Land to rear of Shaldon Road, Lockleaze
- BSA0410: St. Peter's Elderly Persons' Home, Horfield
- BSA0501: Blackberry Hill Hospital, Manor Road, Fishponds
- **BSA0502: Glenside Campus, Blackberry Hill, Fishponds**
- **BSA0513: Garage site, Woodland Way, Chester Park / Hillfields**
- BSA0515: Graphic Packaging, Filwood Road, Fishponds
- BSA0516: Former Parnall's Works site, west of Filwood Road / north of Goodneston Road, Fishponds
- BSA0517: Diamonite Industrial Park, Goodneston Road, Fishponds
- BSA0801: Morley / Ashley / Southey Street Works, St Werburgh's
- BSA0802: Shiner Ltd Builders Merchants, Church Road, Redfield

- BSA0803: Land at Junction of Church Road and Heber Street, Redfield
- BSA0805: Land at former Elizabeth Shaw Factory, Greenbank Road, Easton
- **BSA0906: Car Sales site at 62-74 Bell Hill Road, St George**
- **BSA0907: 47: 49 Summerhill Road, St George**
- BSA1001: Alderman Moore's former allotments, Ashton Vale
- **BSA1011: Site adjacent to Holy Cross Church, Dean Lane, Bedminster**
- **BSA1101: Bath Road Open Space (west of Totterdown Bridge), Totterdown**
- **BSA1103: Red Lion Works, Greenleaze Road / Wells Road, Knowle Park**
- BSA1108: Land at Novers Hill, east of Hartcliffe Way and west of Novers Lane / Novers Hill
- **BSA1109: Land adjoining Hartcliffe Way and Hengrove Way, Inn's Court**
- BSA1112: Knowle West Health Park, Downton Road
- BSA1113: Land adjoining Airport Road between Creswicke Road and Salcombe Road
- BSA1114: Land at Novers Hill, adjacent to industrial units
- **BSA1115: Former Florence Brown school, west of Leinster Avenue**
- **BSA1116: Open spaces either side of Inns Court Drive, Inn's Court**
- BSA1117: Land adjoining Airport Road to the east of Salcombe Road
- **BSA1118: Broad Plain House and associated land, Broadbury Road**
- BSA1119: Land to east of Hartcliffe Way, south of the Waste Depot (Site is currently proposed for a household waste recycling centre)
- **BSA1120: Land and buildings between 2 to 20 Filwood Broadway**
- **BSA1122: Sports court and former swimming pool site on the north-east corner of the Filwood Broadway and Creswicke Road junction**
- **BSA1123: Filwood Library and adjoining land, Filwood Broadway**
- BSA1124: Kingswear Road, Torpoint Road and Haldon Close
- BSA1201: Land at Broom Hill, Brislington
- BSA1202: Paintworks Phase 3 and adjacent land, Arno's Vale
- BSA1203: Government Offices, Flowers Hill, Brislington
- **BSA1207: 493-499 Bath Road, Kensington Park, nr Arno's Vale**
- BSA1210: Former Petrol Filling Station, Bath Road, Arnos Vale / Totterdown
- BSA1213: 801 Bath Road, Brislington
- BSA1301: Site of former City of Bristol College (Hartcliffe Campus), Hawkfield Road, Hartcliffe

- BSA1302: Imperial Park (vacant southern section), Hartcliffe
- BSA1304: Bristol Water Bedminster Depot, Bishopsworth Road, Bedminster Down
- **BSA1305: Land to the north-west of Vale Lane, Bedminster Down**
- BSA1307: Part of Whitehouse Centre, Fulford Road, Hartcliffe
- BSA1401: Hengrove Park
- **BSA1402: Former New Fosseway School, Hengrove**
- BSA1407: Maesknoll Elderly Persons' Home, Bamfield, Hengrove
- KS02: The Horsefair / Callowhill Court
- KS03: Union Street
- KS04: St. Mary-le-Port
- KS06: Land at Lower Castle Street and Broad Weir
- KS07: Land to the west of Castle Street / Queen Street
- **KS10: Redcliffe Way**
- **SA101: Wapping Wharf, Wapping Road**
- **SA102: Waterfront Site, Millennium Square**
- SA104: McArthur's Warehouse, Gasferry Road
- **SA202: Land to the west of Lodge Street**
- **SA301: 55-59 St. Michael's Hill**
- SA401: Disused transit sheds at Welsh Back / Redcliffe Way
- **SA403: Old Seaman's Chapel, Royal Oak Avenue**
- **SA404: Gap site, 16 Narrow Quay**
- SA501: Lakota Nightclub / Former Coroner's Court, Upper York Street / Backfields
- SA503: Land at Surrey Street / Portland Square (Sandhu's Warehouse)
- SA505: The Carriage Works & Westmoreland House (The site has full planning permission and is expected to be developed.)
- **SA506: 97-101 Stokes Croft**
- **SA507: 27-33 Jamaica Street**
- **SA509: Land at Wilder Street / Argyle Road**
- **SA510: Land at Dove Lane / Ervine Terrace / Wilson Place / Cheapside**
- **SA511: F C Hammonds 13-17 Dove Lane St Pauls**
- **SA512: 109: 119 Newfoundland Road**
- SA513: Former Macey Rewinds site, Franklyn Street

- SA601: Former Courage Brewery, Bath Street (Site is largely complete.)
- SA603: Redcliffe Village (Site is under construction.)
- SA604: Bathroom Solutions, Redcliff Street / Three Queens Lane
- SA607: Fire Station, Temple Back (Part of site redeveloped.)
- **SA608: Land and buildings at Victoria Street / Temple Street (Part of site refurbished.)**
- SA609: 103 Temple Street / 111 Victoria Street
- **SA610: Railway cutting, Lower Guinea Street**
- **SA612: The Bell and adjoining buildings, Prewett Street**

Appendix 4 – Summary of Appendix D of the SHLAA

Site address (including use(s) suggested in submission)	Summary outcome
The Galleries, Broadmead Suggested for: Mixed Use	Part of development strategy area DS1A (Broadmead, Castle Park and the Old City).
Callowhill Court, Bristol City Centre Suggested for: Mixed Use	Part of development strategy area DS1A (Broadmead, Castle Park and the Old City).
Land between Union Street and Silver Street, Bristol City Centre Suggested for: Mixed Use	Part of development strategy area DS1A (Broadmead, Castle Park and the Old City).
3-11 Fairfax Street and 15-18 Nelson Street Suggested for: Mixed Use	Part of development strategy area DS1A (Broadmead, Castle Park and the Old City).
Land at Freestone Road Suggested for: Student housing	Part of development strategy area DS2 (Bristol Temple Quarter).
Chanson Foods, Avon Street Suggested for: Student housing	Part of development strategy area DS2 (Bristol Temple Quarter).
Land at Avon Street Suggested for: Mixed Use (University Campus)	Part of development strategy area DS2 (Bristol Temple Quarter).
Land at Albert Road Suggested for: Student housing	Part of development strategy area DS3 (St. Philip's Marsh).
St Philip's Central, Stanhope Street, St Philip's Marsh Suggested for: Residential	Part of development strategy area DS3 (St. Philip's Marsh).
78 Feeder Road, Bristol Suggested for: Mixed Use	Part of development strategy area DS3 (St. Philip's Marsh).
Land at Barrow Road, Barrow Road Suggested for: Residential	Part of development strategy area DS6 (Lawrence Hill).
Filwood House, Fishponds Suggested for: Mixed Use	Part of development strategy area DS7 (Central Fishponds).
Verona House, Filwood Road, Fishponds Suggested for: Mixed Use	Part of development strategy area DS7 (Central Fishponds).
Land at Clarke Street, Bedminster Suggested for: Residential	Part of development strategy area DS8 (Central Bedminster).
Malago Road Trade Park, Bedminster Suggested for: Residential	Part of development strategy area DS8 (Central Bedminster).
Land at Malago Road Suggested for: Student housing and residential	Part of development strategy area DS8 (Central Bedminster).
513 Stockwood Road, Brislington Suggested for: Residential	Part of development strategy area DS9 (Brislington).
817 Bath Road, Brislington Suggested for: Mixed Use	Part of development strategy area DS9 (Brislington).

The Grove Car Park, Bristol BS1 4RB Suggested for: Not specified	Proposed allocation BDA0801.
Land West of Elsbert Drive Suggested for: Residential	Proposed allocation DS11-2.
Land South of Filton Airfield Suggested for: Mixed Use	Allocation would not be consistent with landscape role and designation as a Site of Nature Conservation Interest.
Golden Hill Playing Fields, Kellaway Avenue Suggested for: Residential, open space	Allocation would not be consistent with playing field use and proposed designation as Reserved Open Green Space.
Portview Road Suggested for: Residential	Allocation would not be consistent with proposed designation as Avonmouth Industrial Area.
Former BP/GKN Premises, Atlantic Road, Avonmouth Suggested for: Employment / retail / hotel	Allocation would not be consistent with proposed designation as Avonmouth Industrial Area.
Kingsland Trading Estate, Midland Road, St Philips Suggested for: Residential	Allocation would not be consistent with proposed designation as Industry and Distribution Area.
Barton Hill Trading Estate Suggested for: Mixed Use	Allocation would not be consistent with proposed designation as Industry and Distribution Area.
Whitehall Trading Estate, Gerrish Avenue Suggested for: Residential	Allocation would not be consistent with proposed designation as Industry and Distribution Area.
25 Trinity Street, St Philip's, Bristol, BS2 0NT Suggested for: Mixed Use	Allocation would not be consistent with proposed designation as Industry and Distribution Area.
Land off Woodgrove Road, Henbury Suggested for: Residential	Allocation would not be consistent with proposed designation as Local Green Space and other constraints.
Land off South Hayes, Stapleton Suggested for: Residential	Allocation would not be consistent with proposed designation as Local Green Space.
Former car park and railway line, Tramway Road, Brislington Suggested for: Mixed Use	Allocation would not be consistent with proposed designation as Safeguarded Transport Link.
Bower Ashton Campus Suggested for: Education	Allocation not required for investment in existing land use.
Land at the junction of the A4176 Clifton Down and The Avenue, Clifton Suggested for: Education	Allocation not required for investment in existing land use.
Land to the rear of 24 (West Town) College Road, Clifton Suggested for: Education	Allocation not required for investment in existing land use.

Land to the rear of 85/87 & 95 Pembroke Road, Clifton Suggested for: Education	Allocation not required for investment in existing land use.
Land south of Guthrie Road, Clifton Suggested for: Education	Allocation not required for investment in existing land use.
Land south of Cecil Road, Clifton Suggested for: Education	Allocation not required for investment in existing land use.
Gardens to the rear of 1-10 Priory Road, Bristol Suggested for: Education	Allocation not required for investment in existing land use.
Stoke Bishop Campus, University of Bristol Suggested for: Mixed Use	Allocation not required for investment in existing land use.
Biomedical building, Royal Fort Road, Bristol Suggested for: Employment / Education	Allocation not required for investment in existing land use.
The Brabazon Hangar, Filton Suggested for: Arena and Mixed Use	Allocation not required as site has planning permission for arena and mixed uses.
Hengrove Leisure Park, Bristol Suggested for: Mixed Use	Allocation not required as site has planning permission.
Monarch House, Smyth Road, Bedminster Suggested for: Residential	Allocation not required as site has planning permission.
The Old Dairy, Durnford Street Suggested for: Mixed Use	Allocation not required as site has planning permission.
Broadwalk Shopping Centre, Knowle Suggested for: Mixed Use	Allocation not required as site has planning permission.
Land off Coldpark Gardens Suggested for: Residential	Allocation not necessary due to small size of site.
Land off Ridgeway Road (to rear of Nos. 42-50), Fishponds Suggested for: Residential	Allocation not necessary due to small size of site.
Boiling Wells Site, Boiling Wells Lane, St Werburgh's, Bristol, BS2 9XY Suggested for: Not specified	Allocation not required. The submission was made in response to a proposed open space designation which has not been included in the published local plan.
South Bristol Retail Park, 150 Winterstoke Road Suggested for: Mixed Use	Site not allocated but policy context allows for alternative development
Cabot Gate, Bristol City Centre Suggested for: Mixed Use	Site not allocated but policy context allows for alternative development
No. 1 Passage Street Suggested for: Not specified	Site not allocated but policy context allows for alternative development.
Hospital car park, Marlborough Hill Suggested for: Residential	Site not allocated but policy context allows for alternative development.

Land to the rear of Park Row (129 Park Row excluding No. 9) and existing car park at Lower Church Lane Suggested for: Mixed Use	Site not allocated but policy context allows for alternative development.
Canons House, Harbourway Suggested for: Mixed Use	Site not allocated but policy context allows for alternative development.

Appendix 5 – Sites referred to in response to SPQ6

Site address (including use(s) suggested in submission)	Description and outcome
<p>South Bristol Retail Park, 150 Winterstoke Road Suggested for: Mixed Use</p>	<p>Fully occupied retail park comprising four retail units in a warehouse configuration, associated parking, a separate fast food unit and a coffee shop constructed since the call for sites submission.</p> <p>Submission originally suggested that the site may not be immediately available as there were existing leases at the retail development and since this time further investment has been made in the form of the recently constructed coffee shop. Therefore, there was a lack of sufficient certainty on this site to enable allocation.</p> <p>While the site is not proposed to be allocated, the policy context does not resist redevelopment. The site is not located in or adjoining a centre. Paragraph 123 of the NPPF is supportive of proposals to <i>'use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework...'</i></p>
<p>Cabot Gate, Bristol City Centre Suggested for: Mixed Use</p>	<p>Car park and car rental place within Bristol City Centre. Insufficient information was submitted to enable allocation.</p> <p>The policy context does not resist redevelopment. Permission has since been granted (in 2024) for the continued use of former car park as car rental place for 3 years.</p>
<p>No. 1 Passage Street Suggested for: Not specified</p>	<p>Vacant office building within the City Centre. The proposed use of the site was not specified in the submission.</p> <p>Insufficient information to enable allocation.</p> <p>Since this time the site has gained planning permission for the demolition of existing building to facilitate office-led redevelopment and flexible ground floor uses.</p>
<p>Hospital car park, Marlborough Hill Suggested for: Residential</p>	<p>Hospital car park adjacent to Kingsdown Conservation Area within the City Centre boundary. The car park appears well used and there is no evidence that the owner is supportive of housing proposals on the site.</p> <p>Lack of sufficient certainty to enable allocation.</p>
<p>Land to the rear of Park Row (129 Park Row excluding No. 9) and existing car park at Lower Church Lane Suggested for: Mixed Use</p>	<p>Complex and sensitive site within the city centre comprising University education, ancillary facilities, car parking and Lunsford House, a Grade II* listed building. The site is also adjacent to a further two Grade II Listed buildings and is within the St Michael's Hill and Christmas Steps conservation area and the city centre.</p> <p>Insufficient information to enable allocation.</p>

<p>Canons House, Harbourway Suggested for: Mixed Use</p>	<p>Vacant grade II listed office building within the City Docks conservation area and the city centre. The site is also subject to flood risk.</p> <p>Insufficient information was submitted to enable allocation given the status of the building and complexities of the site.</p> <p>Since this submission a planning application and associated listed building consent have been submitted for the proposed refurbishment and single storey upward extensions to modernise the existing office floorspace and provide ancillary flexible ground floor retail. As such, evidence suggests residential use is no longer being promoted on the site.</p>
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